

DOUGLAS ELLIOTT (INDIVIDUAL)

WRITTEN SUBMISSION

I have given consideration to the various aspects of the proposed changes to site licensing.

My initial concern was that legislation designed to help occupiers could potentially have the opposite effect.

The possibility of leaving a development without a site licence is frightening. The proposed systems to deal with this are either not in place or crude. This legislation is designed to sort out bad site Owners. However, there is a real chance that it will harm more people than it protects.

The residents at Springwood are in the main very content. However, this legislation could devalue their homes by bringing in doubts about the future security of occupation.

Our residents have invested very large sums of money in their homes and this should not be undermined. I would ask that your Committee imagines the position of a park resident where doubts are cast over the framework on which they rely to give them peace of mind and security of occupation. This is crude legislation seriously affects the majority in an attempt to control a very small minority. It is disproportionate.

The legislation has come about as a result of a very small numbers of residents being badly treated by the site Owners. However, a lot of these concerns were addressed in recent changes to The Mobile Homes Act. There is no doubt in my mind that the vast majority of our residents are very unhappy about some of the changes in this Act and the proposed changes in the legislation.

By introducing increased bureaucracy, there is a chance that small park operators will sell their parks on the open market, thus making them available to rogue operators. I believe that there is sufficient legislation to cope with current issues and that these changes are a sledge hammer to crack a nut.

The proposed changes leave far too much to be decided by ministers away from the gaze of parliament at a later date.

At the very least the licensing period should be extended to ten years. The "fit and proper person test" has been abandoned in England as it is unworkable. It should be abandoned in Scotland also.

Douglas Elliott
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