

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

- a. A Park owner

We have [REDACTED] family run parks in [REDACTED] with a total number of [REDACTED] seasonal holiday home pitches, [REDACTED] residential pitches and [REDACTED] Touring pitches and have been in business for over [REDACTED] years.

We provide a personal service to all of our holiday home owners and park home residents offering a friendly approach on a face to face basis with 24 hr contact in emergency.

We employ a member of staff who lives on the park providing on site security. For our park with residents this also includes when the holiday park section is closed, providing continued presence and support for the park home residents and a point of contact in an emergency, any gas sales and refuse / recycling arrangements throughout the winter months.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

- a. Be retained at the current 10% level.
We will aim to explain the reasons for our answer over the next few questions.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We do not prepare our accounts to separate the residential park business from our holiday parks, therefore we are unable to provide precise figures. We are however aware that the residential aspect of our business is the least profitable and the holiday parks subsidise the residential.

4. On average, how often is commission income received by a park owner? I.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On average, [redacted] park home is sold every [redacted] to [redacted] years on our park.

YEAR	Private Sales (Commission)	% total of [redacted] pitches
[redacted] %	0	0%
[redacted] %	[redacted]	11.11%
[redacted] %	0	0%

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

The income generated from the commission contributes towards any improvements or maintenance required throughout the year, for example:

We maintain all recreational areas, including grassed areas adjacent to the park homes, street lighting, clothes drying facilities all year round and sorting of refuse and recycling (even when Holiday park is closed)

Administration staff are on site for advice or assistance and to provide sales of gas and staff are available for any repairs/jobs required by static holiday home owners or park home residents.

Replacement or capital spending is dependent upon income received so this is evaluated each year.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

We would not be able to sustain a viable park home business. Pitch fees are already at a low level and therefore don't cover major infrastructure that may be required.

We may look to change this part of our business over to holiday homes or if this is not possible, consider the option to sell our park with the intention of purchasing a park based solely on holiday homes.

We consider any change or abolition of the commission rate would result in instability in the park home housing market.

Capital Spending: We took the park on with a piped gas system ready for renewal, in order to consider replacement of this system we would need to invest heavily on a new LPG piped system or alternatively subsidise the conversion over to gas bottles for each resident, and therefore our only option would be to collect any commission income over a period of time in order to contribute towards this cost.

The only other way this can be carried out would be for all residents to agree to contribute towards a new system, which in most cases would be unaffordable for them.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We would consider a lower staff level, especially throughout the winter months when the holiday park is closed.

This could result in asking park home residents to organise their own:

- Gas cylinder replacements.
- Refuse collections (currently collected via communal bins, sorted by staff on site). Each resident would have their own bins.
- Clothes Drying

The laundry room could be closed during the winter months.

Conversion over to Gas bottles would be implicated for all park home residents as the renewal of the LPG piped gas system would not be viable.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The park homes on our site are very sought after and we have had no experience of this affecting the sale of these.

Purchasers are looking to 'downsize' their living accommodation with the intention of releasing equity to allow independent living for longer during their retirement, therefore in my opinion purchasers are acceptable of this arrangement and aware that they are purchasing a property in a location that would otherwise become unaffordable and an unrealistic prospect should they need to buy the land the property sits on as well.

We do our best to help any resident who wishes to put their home on the market and offer a link to the selling agents website, via our own website in order to encourage interest and help them find a buyer, we do not make a charge for this as this is done as a goodwill gesture.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Most people coming to us interested in purchasing a park home want to do so in order to release capital on their existing property and say they would not be able afford to buy a property in a similar location and still release funds for their retirement.

The location of our park is the main reason why we have so much interest from people wishing to retire here.

Should we be selling the property without the location I doubt most purchasers would be interested or in a position to afford the additional extra cost of a land purchase on which to locate their park home.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Removal of the commission would result in a need to increase pitch fees and therefore put off prospective purchasers and increase the cost of living for existing park home owners.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Contact via email: _____

However, as indicated in response to Q3, we do not prepare our accounts to separate the residential park business from our holiday parks, therefore we are unable to provide precise figures. We are however aware that the residential aspect of our business is the least profitable and the holiday parks subsidise the residential.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We are finding the mobile home section of our park taking considerably more time, in an administration sense. Our staff pride themselves in making the residents living experience a good one and are at hand for advice or to provide information requested but we are finding this is to the detriment of the remainder of our business in that less time can be spent on the holiday homes section. From a business point of view there are no advantages to this.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We haven't identified any impact.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no suggestions on this matter.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We consider the economics of the above to be our priority.

**Consultation
Response Form**

Your name: _____

Organisation (if applicable): _____

email / telephone number: _____

Your address: _____

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:





RESPONSE TO PARK HOME COMMISSION RATE CONSULTATION IN WALES

Q1

1. Are you:

- a. A Park Owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state
- g. Park Owner

a. A Park Owner

The [redacted] operate [redacted] residential parks in Wales (and [redacted] in England).

We have operated residential park home sites for over [redacted] years with currently circa [redacted] homes across our [redacted] parks.

We provide an affordable lifestyle choice for homeowners who seek a more peaceful environment to live in, with easily maintainable homes. The majority of our homeowners are content in the environment and enjoy the flexibility it can offer. They take pride in their gardens and appearance of the park and they are our best advert for the park for new and prospective buyers.

Our parks in Wales are all different:

- one is only part occupied and pending a decision whether to develop for holiday or residential use
- our main park in [redacted] is part occupied and developed for a further [redacted] homes
- our two parks in [redacted] are fully developed mature parks, with no opportunity for further development.

Q2

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

a. We believe the Commission should be retained at the 10% level.

We would also suggest that the use of the word 'Commission' is misleading and part of this consultation should be to rename it to what it represents which amongst other things is a deferred pitch fee payment.

Our reasons for this will be explained in answering the questions in this consultation.

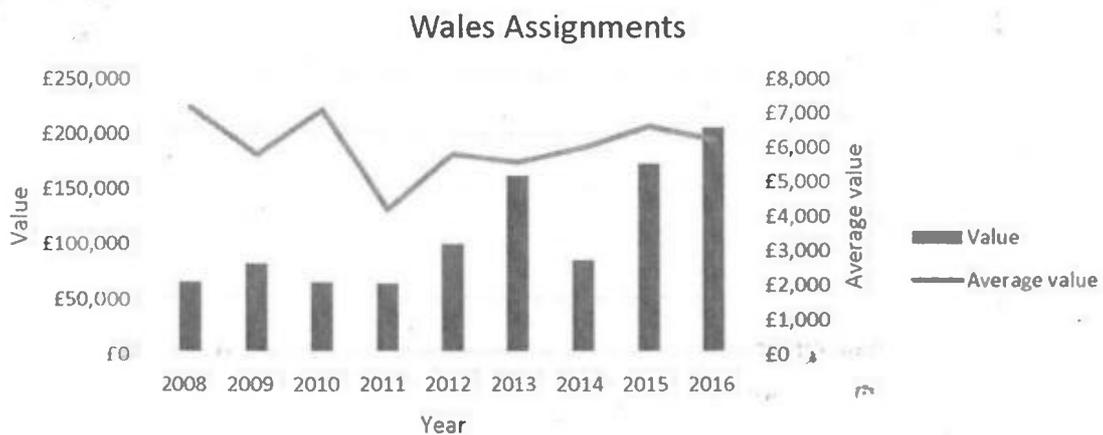
Q3.

3. *How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.*

Over the last ~~5~~ years, commission income accounted for around ~~20%~~ of Park income:

For our Parks in Wales:		
Commission income	£100,000	£500,000
Revenue less recharges and cost of sales	£500,000	£2,500,000
% of revenue	20%	20%

The graph below plots both the total income from commission and the average commission received at our parks in Wales since 2008. The evolution closely follows the housing market with the impact of the credit crunch in 2008 evident in the earlier years of this graph. There tends to be a ten-year cycle so the next housing market squeeze/collapse may perhaps be anticipated shortly.

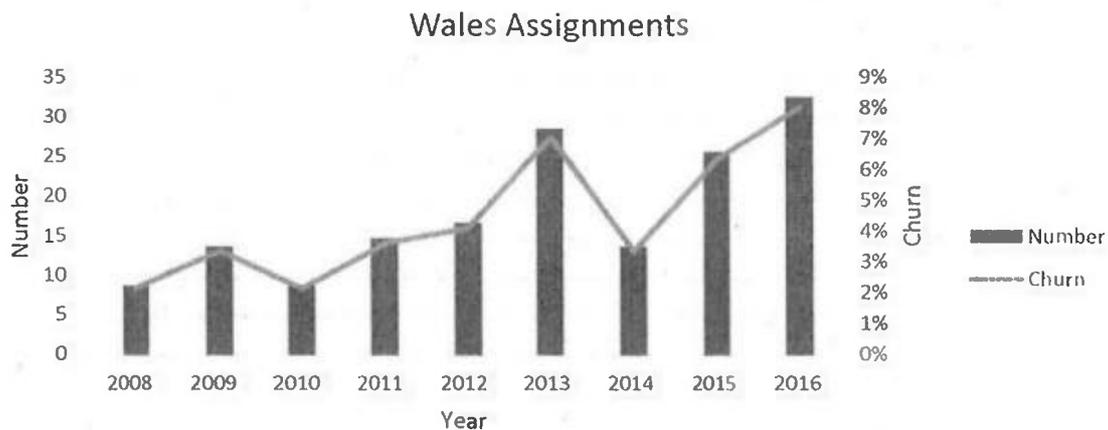


Q4.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Generally, we have a “churn” (number of home sales/number of homes) of around 5% on our Parks in Wales:

The graph below plots both the number of assignments against the % churn on our parks in Wales since 2008.



Q5.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Commission is a part of a three-stream income for our business. We receive

1. Commission
2. Pitch Fee which is regulated by the Mobile Home (Wales) Act and is reviewed by reference to the CPI
3. Profit on new Sales, which is dependent upon either land we have with consent or the purchase of the odd home from time to time, which is a dwindling resource with mature parks.

Those three incomes are combined and used collectively to fund the day-to-day running of the park and the major capital expenditure to maintain and upkeep the park infrastructure

Examples of what that money is used to fund are as follows:

- Repairing and maintaining electrical infrastructure.
- Repairing and maintaining water infrastructure
- Repairing and maintaining foul and storm drain systems
- Repairing and maintaining roads, including white-lining, signage
- Street light repairs and replacement
- Staff costs (staff on the parks in Wales) - Pay, Pensions, NI, SSP, Maternity Pay
- Tree works and tree management programme
- Purchase and maintenance of vehicles including vans, utility vehicles
- Purchase and maintenance of Plant - diggers, dumpers, cement mixers, tractors

- Purchase and maintenance of equipment, such as 'ride on' and other mowers, strimmers, hedge cutters, disc cutters, drills, cable detection equipment.
- Purchase and supply of winter grit and spreading machines.
- Public Liability insurance
- Corporate insurance
- Maintenance, repair and replacement of fire fighting equipment
- Health and Safety advice
- Site licencing fees
- Administration costs (local and central)
- Legal Fees
- [REDACTED]
- [REDACTED]
- [REDACTED]
- Maintenance of Structural ground works such as banks, retaining walls.
- [REDACTED] - maintenance of Sewerage Treatment plant and pumps
- Maintenance and replacement of Park buildings such as workshops, offices.
- Water sampling
- Repairs to Bases

Q6

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The Commission forms an essential part of the income to maintain the park to the standards required.

In the short term, we would need to review our outgoings and make adjustment. For example, we would need to consider staffing costs and possible redundancies amongst park and office workers. This would inevitably lead to decline in the quality of the park and service to our customers, e.g. a slower response to customer requirements. In turn, this would lead to disgruntled residents and to disputes of pitch fee reviews (so an increase in Tribunal cases and rise in legal costs reducing further management time and resource).

We have already seen the impact of the shift to the CPI as the reference for pitch fee reviews and compare that to England, which remains at RPI. Since its adoption, we have seen an increase around one per cent less than RPI. It was negative figure in 2015/16

Applying CPI rather than RPI has already restricted pitch fee income by around [REDACTED] annually. If CPI continues at 2% and RPI at 3% by 2027 there will be [REDACTED] differential between Wales and England given the compound effect.

	CPI	RPI
2014	██████	██████
2015	██████	██████
2016	██████	██████
2017	██████	██████
2027 projected	██████	██████

However, our park costs generally increase above CPI; wages across the company rose by 2.5% 2016 (the corresponding increase in the CPI was -0.9%). Increased legislation also increases cost in Wales with Licence fees and renewals. The introduction of auto-enrolment pensions and the Living Wage also impacts on costs above the CPI.

We would predict that in the longer term the business will become unviable.

As a group with █████ parks, already we would not consider buying any more parks in Wales.

Q7.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We would need to review our outgoings across the board. We would review staff arrangements at our parks and seek ways to save costs. As an example, we currently collect pitch fees by direct debit, cheque or cash as that is what homeowners want but may need to insist on direct debit payments and look to reduce office hours and staff. This would greatly reduce the service to our customers.

We would look at maintenance staffing to see if we could spread the load, by deploying maintenance cover across several parks. For example, we could reduce the frequency of hedge and grass cutting to help compensate for reduced staffing, but ensure we still fulfilled our obligations. Again, this would greatly reduce the service to our customers and potentially impact on the resale value of their homes.

We would need to fulfil our basic obligations of maintaining the park but would risk assess work, and with fewer resources would anticipate delaying some work and abandoning other.

We would also need to scrutinize the work we do to see if there is scope to recharge an element as improvement through pitch fee reviews.

If as we anticipate our costs increase above the income, we would seek to review the pitch fee to take account of this. As already mentioned in Q6, increased tribunal cases would be anticipated in response.

Q8.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Some of park homes are sold by the customer's Estate or through a Power of Attorney.

The commission does not seem to deter buyers as we see a fairly consistent number of Assignment Sales across parks. The figures do not suggest that the Commission is a deterrent to the purchase of a Park Home.

The Commission is in effect a deferred pitch fee. The feedback we receive is that homeowners would struggle to meet increased monthly outgoings. At present pitch fees are affordable and do not present a deterrent to home sales. New pitch fees are also set at a rate determined by the market.

We fear that any change to the commission would result in increased pitch fees, which would be a deterrent for home sales both by us and by our customers.

Simultaneously, we anticipate a gradual decline in appearance of the park, which would be a further deterrent for home sales.

Q9.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

A park home derives its value from its location on a park. Park homes generally keep pace with the housing market and increase in value, with prices dictated by local market conditions.

The off-park value of a park home is minimal and dependent upon the level of maintenance. Any park home over years is likely to have a value less than off the park, but potentially more than on the park.

The value of the pitch is made up of the relative cost of the land in that area. This can be anywhere from up to . In addition, redevelopment of the base cost around

House prices in Wales are lower relative to other areas. When the land value, cost of base development, ex works price for home and siting and preparation fees are taken in to account, the profit margin on new sales is minimal. As such, the commission is more important to the park business compared to where park homes can be sold at a higher market value.

The value of the home is a part of its overall value but the land - which remains our responsibility and in our ownership - carries the majority of that value.

Q10

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The removal or reduction of the commission would have a short and long-term negative impact for Park businesses and Homeowners. The picturesque and peaceful environment of parks would deteriorate with a resulting devaluation of our customers' homes. Over time, we would then experience more problems with breaches of the rules. The legal costs of addressing these in the interests of our customers and our business could not be funded to the point where we simply won't have the resources to contend with the effects.

As mentioned we provide a peaceful and quiet environment for our Homeowners. That comes at a cost and reducing the income to sustain that environment will only be detrimental for all concerned.

As a Company, we would look to sell our parks in Wales but are sceptical that any decent business person would want to invest given the restrictions on income. From the outset, their future income would lag behind their expenditure, which is just not viable.

While homeowners are convinced we do nothing for the 10% and liken it to an agency fee, it is nothing of the sort. It is a contractually agreed means of deferring pitch fee until sale of the home, thus enabling persons over the age of 50 to live in peaceful and affordable surroundings on well maintained parks.

Q11.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Our Company would be happy to share information with the Welsh Government on a confidential basis.

Our accounts are perhaps more complex than some because we are operating ~~in a number of areas~~ and on the one hand have an economy of scale but on the other, would need to apportion Head office running costs.

The best point of contact is ~~Mr. [Name]~~ who is contactable by email on ~~[Email Address]~~

Q12.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The main impact of the introduction of the 2013 Act in Wales has been the shift to the CPI pitch fee review mechanism. We have already seen the divergence of income between our Welsh and English parks, with the last 3 reviews being circa 1% less than England and in one year it was negative. Please see table (repeated from above)

	CPI	RPI
2014	0.0%	0.0%
2015	0.0%	0.0%
2016	0.0%	0.0%
2017	0.0%	0.0%
2027 projected	0.0%	0.0%

We now fund licence fees for the park, which is not substantial but one of the many additional costs we face with legislative change

The pitch fee review documentation has generated a substantial amount off extra administration work and cost for the head office.

Fit and proper person licensing has not had any real impact, other than the licence cost.

The Park rule consultation generated a substantial amount of work and will continue to do so. Rules were challenged in Wales at 10 parks (none in England) with legal costs and subsequently challenged post introduction at another Park in Wales.

Many new homeowners are arriving at the park who are not aware of the rules and Site Licence conditions, which generates more work and is going to lead to more Tribunal cases and greater legal costs.

Some items listed above may seem small amounts but these are on top of other legislative changes, such as National Living Wage, Auto Enrolment pensions.

We have had to increase Staff levels at Head office, as there has been a shift of responsibility with the change in the private sales process. Less work at the park office, but more work at head office, but we still need to retain the Park office staff.

Proposal to abolish or reduce the commission are likely to mean we will need more staff to contend with the Tribunal process to deal with park rule and Licence infringements and objections to pitch fee increases.

Q13.

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We cannot foresee any impact on the Welsh language.

Q14

14. Please also explain how you believe the proposed policy could be formulated or changes so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No suggestions

Q15.

15. If you have any related issues which we have not specifically addressed, please use this space to report them:

As a business with parks, we are aware of the misunderstanding of the commission. We are also aware it has come under scrutiny on several occasions, due to lobby activity on the part of homeowners. On each occasion, the figures provided are comparable and have not indicated excessive profit made by park operators. Rather each review has shown how the income from commission along with pitch fees is essential to sustaining the park business.

The commission is a legitimate source of income stated in the Mobile Homes Act. It is also a contractual Agreement between park operator and homeowner. Many of our homeowners are 50 plus in age, and some with a dwindling income. The commission has for many years allowed the pitch fee to be lower than would otherwise be the case. An increase in monthly outgoings would be unwelcome and unaffordable for many of our customers. However, the environment we can create for those homeowners comes at a price.

Our roads have to be to a higher standard than public roads, there are expectations that roads will be swept regularly, hedges trimmed frequently, roads gritted on every occasion there is a risk of ice and snow and cleared in the winter. We have to supply the equipment and resources to achieve that. We believe that the majority of homeowners understand the contractual obligations they have agreed to and are happy residing on our park:

Consultation Response Form

Responses to consultations are like

prefer your response to remain anonymous, please tick here:

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HOUSE OF COMMONS
LONDON SW1A 0AA

Private Sector Housing Team
Housing Policy Division
Welsh Assembly Government
Merthyr Tydfil office
Rhydycar
Merthyr Tydfil
CF48 1UZ

Our ref: CE10897LIH

11 August 2017

Dear Sir/Madam,

I write to you with regards to the Welsh Governments Park Homes Commission Consultation and specifically the abolishment of the 10% Commission Rate.

Having been contacted by residents of park homes within my constituency, local residents believe that the commission rate is for their benefit.

My constituents inform me that the commission rate was originally put in place as payment to park owners to reconnect park homes to the electricity, water and phone lines. As the new park homes are mostly immovable it seems to them that the commission rate is irrelevant.

I've been informed that residents now pay a pitch fee for the placement and connectivity of their home on the park, meaning that the commission rate is to all intents and purposes just a bonus to park owners.

There is an argument placed in the consultation document (WG31760) that the commission rate is used by park owners as an incentive for the general upkeep of the park. However, my constituents feel this is unfair as they pay a considerable amount per month in ground rent for that exact reason.

In addition to residents having to pay a Pitch Fee and Ground Rent on top of Council Tax, Mortgages, and electricity bills and water bills wish some also paying for gas and LPG. My constituents feel the 10% commission is a real financial burden that provides no real benefit.

To summarise, my constituents believe the commission rate is both unfair and unnecessary, and is yet another financial burden.

I hope you will take the strong feeling of my constituents into consideration during your consultation and support the abolishment of the 10% commission rate on park home sales.

Thank you in advance. I look forward to reading the findings of the Welsh Governments consultation when it closes soon.

Yours sincerely,



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Private Sector Housing Team
Housing Policy Division
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Yours sincerely,

Consultation questions:

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- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.
The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does not attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, the site is on agricultural land which is valued locally at no more than £1000 per acre.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

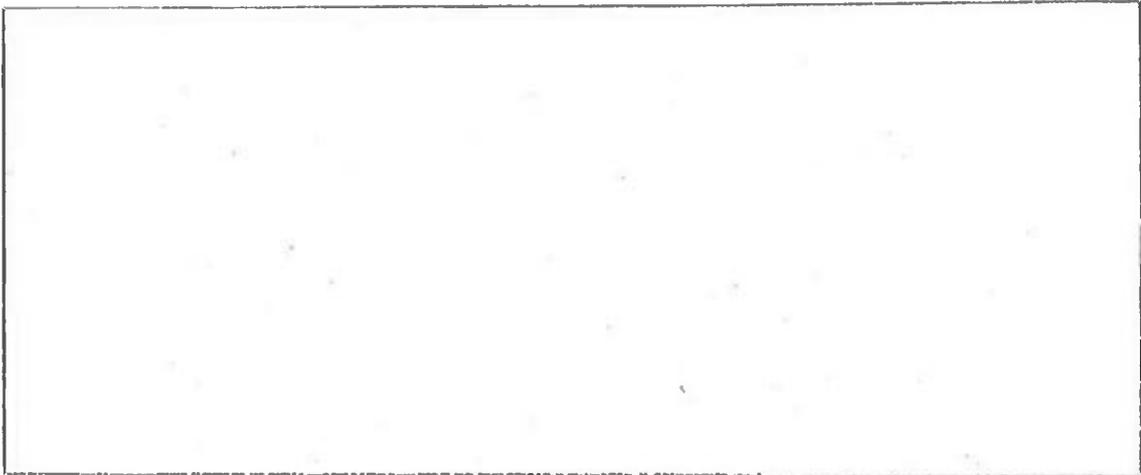
5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these are pegged to the Consumer Price Index which in turn more than pays for the upkeep of the common areas of the site. There are probably some units on this site all paying site fees.

We know from Companies House records that [redacted] (our site owners) had a turnover of [redacted] as a [redacted] with pre-tax profits of some [redacted]. Their shareholders enjoyed a joint dividend payment for the year of [redacted]. This is a hugely profitable business which will not be adversely affected if there is a change in legislation in our favour.

On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

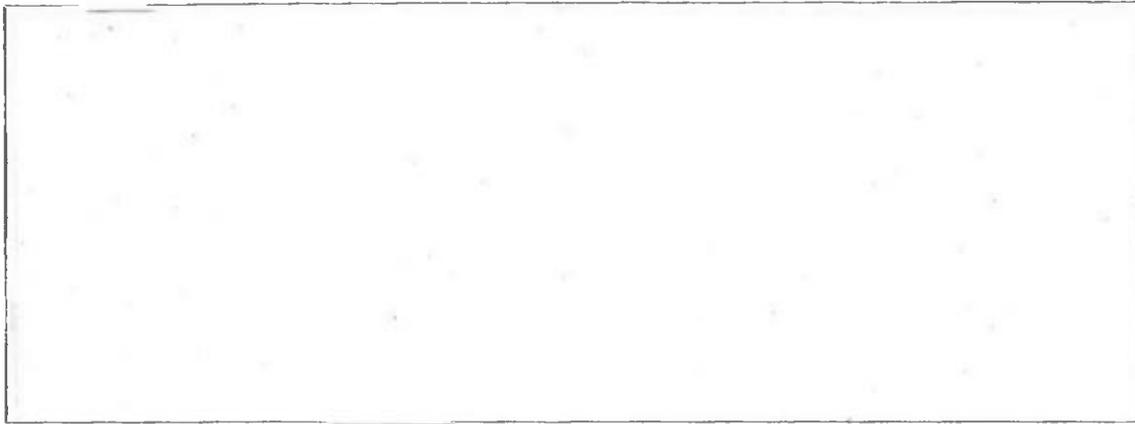


7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with.



10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.



11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We have a genuine concern that if it transpires that the owners of our Park become aware that we have written to Welsh Government to seek the removal of their commissions fee they could make matters very difficult for us. The average owner here is of pensionable age and we cannot afford to be embroiled in any ongoing and upsetting disagreements over this matter. We are seeking assurances from WG that our comments will remain anonymous and confidential.

**Consultation
Response Form**



Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

TE
FA



CHARTERED CERTIFIED ACCOUNTANTS
& REGISTERED AUDITORS



4th August 2017



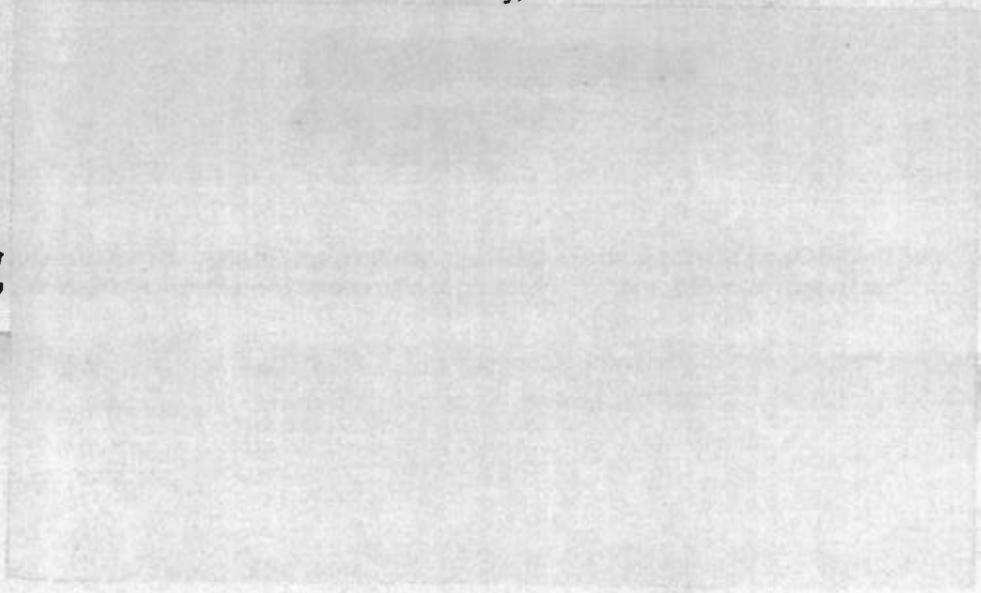
Our ref: DDH/JC/L096

Dear [Redacted]

We refer to your recent correspondence in regard to the Welsh Government Consultation, with a view to abolishing or reducing the commission charges levied by residential parks.

We act as your accountants in regard to the preparation of your annual Accounts, which indicate for the five-year period ended 31st March 2016, a trading net loss has been sustained, [Redacted]. The site is therefore barely in a break even situation and the removal of any entitlement to commission earnings would severely impact the financial viability of the business and potentially place in doubt the continued operation of the site.

Yours sincerely,



*"I grow my busin
talking to me ab*

From:
Sent: 16 August 2017 12:44
To: Private Sector Housing Mailbox
Subject: WG Consultation WG31760. Our Response Reference 62600487
Attachments: ResalesSheetWGConsultationAug17Finalised.xlsx, [REDACTED]WGLetter040817.jpg

We have just made our submission, and have been allocated Response Reference 62600487. However, there was no opportunity to append attached documentary evidence. We would like to append the attached two 1 page items - (1) Letter from [REDACTED] Accountants (2) Spreadsheet of Glass' Guide re-sale figures.

Are you able to do this for us, please?

Thank you, in anticipation of your kind assistance.

WG Consultation WG31760 (my Response Reference No: 62600487)

Sample of details for homes subject to commission sales, where Glass' Guide figures are available

Year of Manufacture	Make	Model	Year of recent site	mcSited price	re-sa achie Retail	Glass' Guic Glass'Guide Trade
1999	Stately Alb	Tredegar	2017	40000	8150	5300
2003	Stately Alb	Tredegar	2013	53000	9525	6625
2002	Willerby	Vogue	2016	32500	11700	4875
2001	Atlas	Solitaire Su	2016	25000	5700	1125
2003	Homeseek	Langdale	2017	39000	10855	8200
2001	BK Bluebird	Brookwood	2011	26000	4075	775

To whom it may concern,

RE: Park Homes Commission Rate

██████████ welcomes the opportunity to present its view on the Park Home Commissioning Rate. ██████████ is the authoritative voice of businesses in Wales. With 10,000 members, a Welsh Policy Unit, two regional committees and twelve branch committees; ██████████ is in constant contact with business at a grassroots level. It undertakes regular online surveys of its members as well as a biennial membership survey on a wide range of issues and concerns facing small business.

The specific rate is not an area in which the ██████████ has collected data, or is able to easily obtain data around the potential impact of such a change. However, we are aware that there are approximately ██████████ businesses in Wales such a change would affect, and that some are members of the ██████████

Our correspondence with members indicates that the sector has faced a number of regulatory changes in recent years, which have altered the financial viability of parks, and made them less viable vis-a-vis competitors in other sectors (such as large caravan parks).

We are also aware that the Welsh Government's own research, carried out in 2016¹ states:

"although the commission rate is an ongoing source of dissatisfaction among residents, the results of this research suggest that its removal/ reduction has the potential to have a negative impact on the viability and sustainability of many Welsh park home operators. If the removal/ reduction of the commission rate were to be offset by an increase in pitch fees, this could have a negative impact on residents who have extremely limited financial resources and who wish to remain in their park home for the foreseeable future."

The report goes on to suggest a way forward, which we suggest should be a voluntary option to be explored between residents and park owners:

"consideration [should] be given to providing new residents with an option of incurring higher pitch fees in lieu of a commensurate reduction in the commission rate applied to future sales"

¹ <http://gov.wales/docs/caecd/research/2016/161005-economics-park-home-industry-en.Pdf>

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C/A ██████████
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It is therefore the view of [REDACTED] that any changes to the commission at this stage may jeopardise legitimate existing business models. Welsh Government should to seek to co-operate with park home site owners in order that current issues around the perception of commissioning fees may be overcome.

I hope you find the comments of [REDACTED] of interest.

Yours sincerely



Ff/T
E
W

[REDACTED]

C/A

[REDACTED]

[REDACTED]

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:
 - a. A park owner
 - b. A representative body for park owners
 - c. A park home resident (owner)
 - d. A park home resident (tenant)
 - e. A representative body for park home residents
 - f. Other, please state

Answer: I am a Park Owner. We are a family business that have owned and have been operating park homes estates for 3 generations, that started in the 1960's. We are proud of the parks we own. We have had quite a few complimenting editorials in the Park Home magazine from residents enjoying our parks high standards of park home living.

2. Should commission on the re-sale of park homes in Wales:
 - a. Be retained at the current 10% level
 - b. Be reduced
 - c. Be abolished
 - d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

I believe this commission rate should be retained at the current 10%. There are a lot of factors where this income is used. For example our main residential park is in wales, the expenditure to maintain the park to a good standard also to meet site licence conditions far exceeds the income from pitch fees. Our residential park of [redacted] homes sits in [redacted] acres idyllic country side, but these grounds need to be maintained, hedges trimmed, park communal areas with grass cutting. We have a [redacted] acre woodland adjoining. We have [redacted] of park roads to be maintained. There are miles of sewer pipes that need maintaining. We have sewer treatment plants that need constant maintenance schedules. We have our own spring water supply that needs maintenance with holding tanks and pumping stations. Our low pitch fees of [redacted] per month does not cover the costs to maintain this park. Our commissions are used to support our maintenance plans. We also have lakes that need maintaining. Also many of our residents claim for benefits for their pitch fees. If the commissions were to be altered, pitch fees are to be increased to cover these costs, so this could be an extra strain on the Government to cover these increase. At the moment the day to day living costs for the residents would not alter. The commission is only payable when the resident needs to sell their home for their personal circumstances change : (1) if the resident needs to move to a rest home. (2) move to relocate. (3) or if they pass away only then is the commission payable and only at this point when its payable by the purchaser and not the seller.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

It is very hard to answer this question as the income from commissions is not guaranteed and is not planned when they are to happen, so is hard to budget for. They depend on residents personal circumstances, as I tried to explain in question 2. As a percentage I would estimate an average of about 4 or 5%. But not to long ago we went for 4 years without any commissions so this really does vary. The CPI pitch fee review made us more reliant on our commissions, because as I have said before our commissions are used to maintain the park as it should be. The day to day running costs of everything seem to be increasing but for several years now the CPI has been low and has not even covered the administration costs to increase pitch fees, let alone any thing else.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Commissions received is inconsistent, and cannot be budgeted for down to the last penny, but what we try to do as park owners is try and keep a fund ready that can cover the costs of any emergency works needed for example : if the sewer treatment plant needs any works, equipment can break down, all this is very expensive and often needs to be done immediately. sewer pipe blockages occur which we are responsible for. Sewer pipes can collapse, we are responsible for this also. Also for example about [redacted] years ago our water pipes around the whole park needed replacing, as the pipes were very old and we had water leaks that we could not fix nor find so we needed to replace and upgrade the whole park with water pipes, new metres to each home, as we also had our spring water supply we needed new pumping stations also. This was at a massive massive expense to ourselves, as the park needed over 4 miles of water pipes. we had to burden the costs of all this and the labour costs to get the job done. Our funds did not cover these costs, but this can happen, Often many parks are not on mains sewer and these treatment plants are very expensive to run and to keep running properly. These unexpected problems can and do happen but have to be paid for. This job cost in the region of [redacted] we will never see this return from our pitch fees. The park owner is responsible for such a lot of things that people do not realise. I feel a lot of residents think the commission is like an agents fees, this is so not the case. Our responsibilities do not end whilst we own the park. If there are any problems with the concrete bases their homes are sited on, it is our responsibility to repair or even replace. this all has to be paid for. For these such examples this is when the income received from commissions is used. I have got to be fair as the majority of our residents are fully aware of the commission payable and understand once I have explained this to them. As they see the investments into the park we have done. All our infrastructure is private and needs to be funded. Our Sewer treatment plant needs constant upgrades and improvements to conform to authorities such as Environment agency

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I think I have answered this in question number 4. as we invest in our underground infrastructure not just what can be seen above ground. we take pride in our parks as they are important to us. we have developed good parks for residents to live on and we care about what we done.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I think this shall be quite worrying to a lot of park owners if the commission is altered. As many of us have mortgages that have to be paid for. These parks are businesses and the parks are expensive to purchase in the beginning, and they cost a lot of money to keep running properly, this is where the commissions are used to support the income from pitch fees. I feel if the commissions are altered in my opinion I would look to the rental side of the industry to increase the income, but I feel this would be a shame for us because I think the overall condition of the parks would decline as cut backs would need to be put in place. So if the condition of the park declined, it would be the residents that would be the ones to see the decline.

I think the commission should not be altered so not to alter the balance of the park.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I think we all would need to look at cut backs where ever possible, because we still have to be carefull for the worry of unexpected expenditure if it were to occur.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

All of our residents are fully aware that there is a commission payable and they accept that. They understand that the commissions are used to help towards the maintenance and improvements of the park. They are happy to see that the park is maintained to a good standard, as its the park also that keeps their investment good. This is important to the residents ability to sell and keep resales good.

9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.

A park home being sited on a good pitch on a good park would probably constitute to 70% of its value. e.g.

The value of a second hand 40 x 20 park home, 5 years old being sold off site would probably be worth about [REDACTED] but being sited on a good park would probably be worth in the region of [REDACTED] approx.

A park with good infrastructure also keeps the resale of park homes good.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Our commissions are used to help maintain our park, if this were to be altered I personally would look to increase our rental side of our parks income to fund what is needed. I think other park owners would look to do the same. But I feel maybe the over quality of the parks may decline.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

As a park owner I am happy to help in any way to help the Government understand how the income from commissions is used and needed. The pitch fees do not fully fund our maintenance program. My company [REDACTED] runs numerous parks so I would have to ask my accountant to split the income and expenditure for our [REDACTED] which is [REDACTED] from our other parks in [REDACTED] but in principle I agree to help.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Now that we have settled into the new Mobile Homes act I think it is working quite well. We have struggled with the CPI increase but I have already tried to explain my case about this.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects

do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We don't feel it makes any difference.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on

treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No suggestions.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.
 The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does not attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, the site is on agricultural land which is valued locally at no more than [REDACTED] per acre.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us:

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

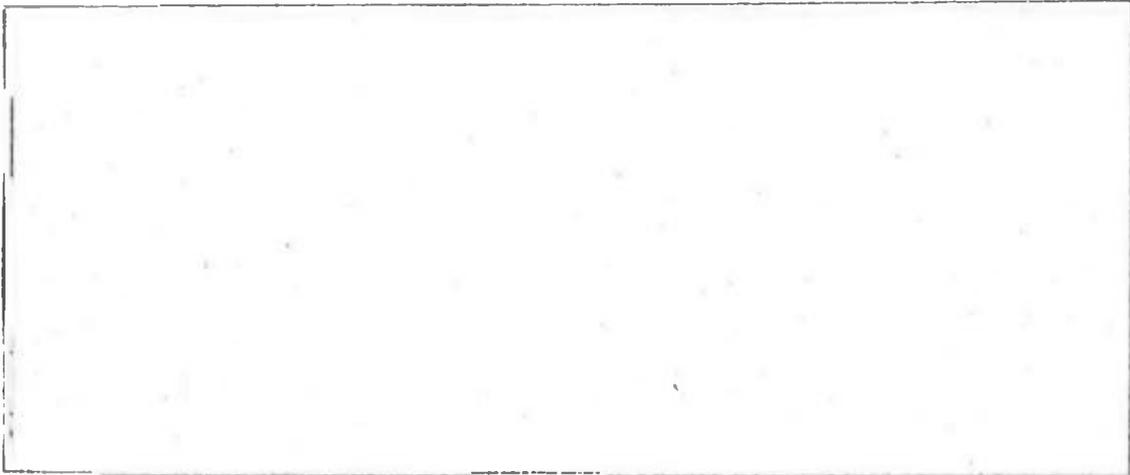
5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more than pays for the upkeep of the common areas of the site. There are probably some [REDACTED] units on this site all paying site fees.

We know from Companies House records that [REDACTED] (our site owners) had a turnover of [REDACTED] as a [REDACTED] with pre-tax profits of some [REDACTED]. Their shareholders enjoyed a joint dividend payment for the year of [REDACTED]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.

On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with

**Consultation
Response Form**

Responses to consu
would prefer your res



Response to the Welsh Government Consultation Document

WG31760

The Park Homes Commission Rate

Response to Consultation Questions Adopting the Numbering as set out in the Consultation Paper

1. I am a solicitor and act for residential park owners. I have acted for residential and holiday park operators for around 15 years and have a lot of knowledge of the residential park home industry in England and in Wales.
2. This is a difficult question to answer. From the feedback I have received and taking into account the options in a.-d., the commission should either be retained at the current level, which is a *maximum* of 10%, or be reduced. If neither a. or b. is decided upon, consideration will need to be given as to how the income received from commission can be replaced.
3. This depends on a number of factors including the size of the site business (i.e the size of the park and the number of homes on it) and whether there is a minimum age requirement. Also, as the park home industry tends to follow the housing market, a park owner may find that in some years more homes were sold than in others. There are commercial and economic factors which will impact on the number of homes which are sold.

On parks where there isn't a minimum age requirement in the park rules, there may be a higher rate of sales as people move on with their lives. It is probably fair to say that younger people between a certain age range are likely to move house more than older people. In this scenario, the commission income received is likely to be higher than on a park where there is a minimum age requirement and the majority of the homeowners have lived on site for a considerable period of time and are often much older than the minimum age requirement. Often on parks such as this, a resident's home is usually their last place of residence before moving into a care home or passing away. This scenario is very common on the smaller, often family run parks. As such, the income generated through commission will be lower than on other parks where residents are younger.

On the smaller, family owned and run sites where the residents in general are long standing, there is likely to be little or no opportunity for the park owner to develop new pitches or to be able to offer to buy back homes at market value so as to be able to develop a pitch, sell a new home and enter into a new agreement with perhaps a higher pitch fee. Therefore on these parks, the pitch fee income is likely to be the main source of income supplemented by the income received from commission sales which may be few and far between.

4. This is a difficult question to answer. As set out in my answer to 3 above, it depends on a number of factors and I don't think it is possible to give an average unless the information is recorded over say a period of 10 years and the average number calculated for each year.

In terms of how the income received from commission sales is incorporated into the park business plan, I gather that this tends to go into the same "pot" as income

generated through pitch fee income and any new sales by the park owner to meet the park's outgoings.

5. On the basis that the income from commission sales is included within the same income "pot" it is helpful to consider the nature of the outgoings of a park owner in relation to the ownership and operation of any residential park. In some years the annual outgoings are going to more than in other years.

The outgoings include:

- 5.1 Maintenance of the common areas of the park
- 5.2 Repairs and renewal of any park infrastructure including running costs
- 5.3 The cost of insurance
- 5.4 The cost of complying with health and safety matters including health and safety assessments (separate to the responsibilities of the park owner under the conditions of the site licence)
- 5.5 The cost of complying with conditions of the site licence including electrical and gas safety inspections
- 5.6 Wage costs
- 5.7 Equipment and machinery costs including repairs and running costs
- 5.8 The costs of any permits, especially in connection with any environmental permits
- 5.9 Advertising
- 5.10 Photocopying costs, admin costs in general
- 5.11 Professional fees (accounting and legal advice)
- 5.12 Membership of professional organisation (such as the BH&HPA and NCC)
- 5.13 Buy in and refurbishment costs
- 5.14 De-siting and moving costs
- 5.15 Updating and modernising the site (reinvesting) – improving standards and meeting expectations for example, installing mains gas and metered supplies.
- 5.16 Costs of meeting changes in the law in general
- 5.17 Other third party costs – for example paying for any gas, electricity, water supplied before this cost is recovered from the residents
- 5.18 Repayment of loans

In general the pitch fee income goes to paying for the maintenance of the common areas (the cost of this generally increases above the CPI increase) and I gather that most if not all of the pitch fee (especially on the smaller parks where perhaps a low pitch fee is payable for historic reasons) is spent on this even though the definition of pitch fee in the Act includes payment for the right to station the home on the pitch.

Therefore from this information, little if any of the amount paid in respect of the pitch fee is attributed to "rental income" i.e. the entitlement to station the home on the pitch.

Therefore the income from the commission and any new sales (which may be few and far between on smaller parks) is spent on those things from 5.2 to 5.18.

6. Any change needs to be thought through carefully so that the offering park homes make to the overall housing market is not damaged through under investment (through necessity). As the background to this paper has already said it is the interests of both the park owner and residents, for parks to continue to be well managed and run, and continue to raise their standards.

I think the concern is that if the commission rate is abolished or reduced significantly, parks may be sold to a larger park operator (where the family run feel of the park and the park owner being a familiar sight on park is replaced by a faceless corporate entity) or the minimum amount spent on the park to meet the obligations under the agreement or if the money is not there, left to deteriorate. If this were to happen, in the extreme, this could mean intervention by the local authority or parks having to close and the local authority's resources coming under strain to provide accommodation for displaced residents. It is not likely for homes, especially older homes with porches or extensions to be welcomed onto other parks.

I also think that by abolishing or reducing the commission without a suitable replacement, park owners may choose to try and rely on the pitch fee review provisions more. For example, those park owners who perhaps might absorb the cost of works to be done on the park by paying for this through means other than the pitch fee income (already absorbed by general maintenance costs) may make the decision to seek to review the pitch fee to take into account this cost. There may be more applications made to the Tribunal.

Park operators may look to borrow against the park and to try and meet the costs ordinarily met by the commission income in this way. Outgoings of this nature may increase. Also, those owners who may have borrowed against the park in order to carry out some development works may encounter some difficulty in servicing the monthly repayments if the commission income is lost or significantly reduced.

7. In addition to the last two paragraphs under 6 above, park owners might seek to reduce the number of staff or their time spent on site (a lot of park owners travel to and from their parks – not all live on site) which has a cost attributed to it. They might seek to sell up but with the abolition or reduction in commission (without any corresponding increase in pitch fee) this is not going to be an attractive prospect and if there is no development potential and sales are few and far between (reducing any possibility of the park owner offering market value for any homes which do come on the market) the park may stay on the market for quite some time. If that were to happen, investment in the park would obviously reduce.
8. Residents who are selling will have either bought from the park owner where the written statement will have been given in advance or from an outgoing resident. They were in the same position as any buyer and bought knowing that commission is payable on the sale.

Park home living is attractive to a lot of people especially those downsizing and looking to be involved in the sort of community that residential parks tend to offer. This is unlike any other form of residential accommodation.

Generally speaking, as with any purchase of residential accommodation whether it is freehold or leasehold estate which is being transferred, there are pluses and minuses (contained in the transfer or the lease including restrictive covenants) and the requirement to pay up to 10% commission could be construed as a minus by any purchaser and may in some cases mean the difference between a sale and the home remaining on the market for longer.

9. It is not the fact that the park home is situated on a pitch which adds value but the fact that a park home is situated on a pitch with the benefit of a Mobile Homes Act agreement which provides the security of tenure until the agreement is terminated. The value of the home with the agreement will vary depending on the age of the home, its condition and the size of the pitch. The better maintained a park is the higher the market value of the home.

Some parks, especially the smaller, older family run parks will have homes on them which were sited in the 1970s and had the benefit of an agreement under the Mobile Homes Act 1975. These homes no longer feature in any trade guides. The value of homes offsite could be very low and perhaps only of scrap value (especially if they are not of proprietary manufacture or have porches and extensions) whereas with the benefit of a Mobile Homes Act agreement the value is considerably higher, often tens of thousands of pounds more because of the value the agreement gives as a result of being stationed on the park with an entitlement to live there.

10. See answers to earlier questions.

11. N/A.

12. The introduction of the Mobile Homes (Wales) Act 2013 has meant that the sector is better regulated with the increase in statutory powers especially of local authorities and more consistency across the industry especially in terms of explanations for a pitch fee review using the prescribed form etc. Therefore, there has been an increase in the transparency of the sector.

However, with changes comes a requirement to improve knowledge of the changes, put those changes into practice and comply with them which has costs associated with this.

13. No comment.

14. No comment.

15. I have alluded to changes to the regulations of the industry in Wales over the past 10 years.

The industry, as with all industries, is facing uncertain times especially given the impact of Brexit which is an unknown quantity. It is not known what changes the industry could face once Brexit happens for real.

A change to the status quo in these uncertain times may be too much especially for the smaller family run operators to cope with and contend with leading to park operators leaving the business which would be a great pity for the industry as a whole.

There is no consultation question regarding an alternative to commission in terms of any increase in pitch fees. There is reference at the beginning of the consultation

document about an increase in pitch fees potentially affecting residents who are on low income or changes only being introduced when a new agreement under the Act commences. A two tier system may be confusing and problematic for some owners increasing their administration costs.

It may be appropriate for any new sale by the park owner of providing the prospective buyer with choice of whether they pay a pitch fee of "x" in lieu of the commission 10% less on their sale price so that they can make the decision.

The Park Homes Commission Rate

151

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C – Park Home Resident

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C – Abolished

This answer is based exclusively on my specific circumstances. Our park is poorly managed and maintained, and there has been no action to rectify ongoing issues. Our negotiations and discussions with the [redacted] responsible for the park have failed.

I do not believe that the owners would or could be considered a "fit and proper" under the Mobile Homes (Wales) Act 2013 part 2-6(4)b. We have also seen continuous failings by the local authority to use any enforcement action to bring the park up to standard.

I can understand where, in well maintained, parks with good facilities, a lesser fee may be appropriate, but fail to see how this is any different to a standard leasehold agreement where the home owner pays a set fee to the leaseholder. A normal leaseholder would not get a % of any sale.

To move forward I would suggest re-evaluating the Mobile Homes (Wales) Act 2013, as from my experience, enforcement action has been non-existent and the guidance around a fit and proper person needs clarification.

There are currently no accounts shared with the home owner / residents by the park owner

regarding the spending of ground rent. There have been no attempts at betterment of the park despite calls for a higher ground fee rent raise.

As a result the tenants / home owners are left to wonder where and how the money we pay is spent. Accountability needs addressing and transparency regarding accounting and maintenance needs establishing.

There also needs to be further sanctions available against park homes owner, who may be bullying or harassing residents. Many of the residents in our park home properties are elderly and vulnerable. What action is being taken to prevent an abuse of the authority of power the park owner holds over them. It is worth looking at the Housing (Wales) Act 2014 for steps taken in terms of the Private Rented Sector for guidance.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

There is NO evidence that the owner has re-used any of the commission he has received on this site.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Since I arrived on the park, only [REDACTED] park home has been sold. There are however, [REDACTED] homes for sale now with a further [REDACTED] homes to be sold later due to the deaths of the owners.

One owner has been advised to take his home [REDACTED] the park, this along with the prospect of any buyer needing to pay 10% commission is putting people off buying our properties.

Again, please see the pictures re: state of the park.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

We have no evidence of any commissions or site fees being used to improve the park and we have not seen or been made aware of any business plans.
Please see Q2 re: Local Authority (support???)

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I am currently paying [REDACTED] in site fees per month, and I also paid the 10% commission when I purchased this home. I have seen no evidence of improvement or maintenance to the park, in fact, it has deteriorated considerably. Please see Q2 for further assessment, and the enclosed pictures.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I have seen a rapid deterioration in the condition of the park since I bought my property here. – please see enclosed pictures.

This deterioration has impacted on the resale valuations which are decreasing. This will mean that if any of us need to sell our homes we would be unable to purchase or rent a new home. This could lead to vulnerable older people becoming homeless (and goes against the running theme of a Prevention Agenda in the Housing (Wales) Act 2014. Meanwhile, it is taking so long to sell any property, the park owner seems happy to sit on our site fees and do no work to fulfil his obligations.

Sadly, this situation is not helped by the fact that the local authority have continually failed to follow through on any enforcement options available to them.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It nearly put me off buying my home!

The deteriorating condition of the site, along with commission fees, estate agent costs make selling of our homes unappealing for buyers.

When relatives are trying to come to terms with the death of a loved one, and they know that any legacy left by the deceased will be less than expected, it raises further concerns. Plus, as properties fail to sell in a mis-managed and under supported park, they become responsible for maintaining ground rent payments (which are demanded).

If we had an ordinary leasehold property we would pay the ground rent but you would not pay commission to the leaseholder.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

If a park home is situated on a well-kept and maintained park then it adds value and is a very viable, attractive option for many looking for affordable housing. Unfortunately, on this park, because of its poor maintenance, the values are deteriorating and are not looked upon by potential purchasers as a viable purchase option. There are empty plots on the site, but because the site is so badly maintained it is unlikely that any new homes will be put on the site. I do not understand how the owner can regularly fail in his duty to maintain the site, as this can only make good business sense – higher valuations, higher ground rents etc... Please see attached photos.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

If the commission was abolished I feel that in my current situation, it would make a difference. The park would continue to deteriorate as the owner has no interest in his responsibilities as an owner to his residents, and fails to make required maintenance repairs despite continuing to demand site fees. The local authority and Welsh Government would see an increase in Homeless presentations of vulnerable and elderly residents no longer able to stay in their homes. Statutory duties would be owed to these residents and yet, with appropriate and actioned enforcement, these residents would feel able to stay in a well maintained and managed site. The owners of any such park / site should be responsible for showing a business plan and having clear and transparent accounting of the site. The local authority's failure to undertake any enforcement is disheartening. We would have hoped for more support from them but instead only have this option to put our feelings onto a consultation document looking at whether park owners deserve a commission.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The introduction of the Act is supposed to provide support and guidance to residents living in park homes, but has had nothing but a negative effect.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N/A

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

Park owner for ■ years with ■ pitches, a long-established park treated as a community for over 50s where we all take care of each other.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

10% should be retained.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

The only time we have a vacant pitch is when the owners pass away – it is hard to guess such a situation.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

As stated in Q3.

Major jobs on the park include resurfacing roads and renewing lighting on the park. Homeowners generally move after the loss of a partner, you can't budget for improvements or maintenance on the possibility of someone dying.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

As in Q.4

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

This park has had not loan or financial borrowing for many years. There would be less income to maintain the standard of the park, this would impact on the residents' enjoyment, safety and resale value of their homes.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Our park provides affordable, pleasant and safe homes for retired people in an area of expensive properties. Keeping the level of maintenance high is essential to them. Commission is necessary for this, pitch fees alone is not enough.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

There are a variety of ways the commission is paid e.g. one partner dies, some move nearer to their children – the commission is paid by the remaining partner.
Sole survivor, sometimes family move in – no commission.
Left to an estate – paid by beneficiaries
The preferred time for residents is to pay commission at the end of the occupation.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Being on the park generally enhances the value of the homes.
A recent sale of an [redacted] old home sold for [redacted].
The plot next door to our park sold for [redacted] (large plot). The property around our park is expensive – all detached, no estates, ours is vital for the less well off.
Maintaining the park above and underground ensures that the homes rise in value, whereas off pitch over years, they become worthless.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Less or no commission, means less money to keep this park highly desirable. People like to live in a pleasant environment, common sense says all work done costs money. If parks aren't maintained, standards will go down, people who can't afford property won't want to live in a run-down environment. Parks will become harder to sell, which benefits neither homeowner or park owner.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

[Empty box for providing contact information]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

In all fairness, I can't say that it has impacted on me personally, but then I don't feel this park is "the norm".

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?



14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.



15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Parks of this size, [REDACTED] will not make you rich; it is a way of life that I try to maintain to make life pleasant for everyone who lives here including myself. Our time and work doesn't get accounted for on any tax return.

I've owned this park with my late husband since [REDACTED] when it was a bankruptcy purchase, half developed. It has been full for many years and feels like an established bungalow estate. The homeowners feel safe and privileged to be able to live in such a beautiful area. We don't have residents committees, no one has ever felt the need for one, any problems are dealt with in an adult, polite manner.

I think most people would rather pay 10% commission of which they are aware before buying their home, than the uncertainty of higher pitch fees.

Consultation Response Form

Your name: [REDACTED]
Organisation (if applicable): [REDACTED]
Email / telephone number: [REDACTED]
Your address: [REDACTED]
[REDACTED]
[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: a: A park owner of a relatively small park that I have owned for [redacted] years [redacted] [redacted] [redacted]. We provide the homeowners with an on-site full time warden service who also maintain the site to the highest standards. We have an extremely happy and close knit community and many enquiries from people wishing to possibly move here to live. We don't have any available plots for new properties so pitch fees and commission are the only source of income to maintain the current high standards.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

a: Be retained at the current 10% level. On smaller parks without any plots to place new properties, the total pitch fee income is insufficient to maintain the parks to the acceptable level both required and accepted. Current legislation only allows pitch fees to go up by the CPI annually and requires a great deal of time and paperwork to inform residents of the increase/decrease. Due to the current economic climate the cost of informing the residents is greater than the income derived from the pitch fee increase. Only real prospect of maintaining standards is the income provided by commission on private sales.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Over the [redacted] years from [redacted] to [redacted] our park business made an average loss of [redacted] each year.

Commission income averaged [redacted] each year over this period (an average of one commission on one private sale each year).

We will provide Welsh Government access to our accounts on a confidential basis as evidence of the essential contribution of this income in sustaining our business and the standards our customers rightly expect.

There is now no opportunity for sales by the park, so going forwards we can anticipate pitch fee income of some [redacted] and commission income of some [redacted] on average each year. This means that commission will represent [redacted] of the income to maintain standards and staffing.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On average one per year over the [redacted] years from [redacted] to [redacted]

With [redacted] pitches, this means 3% of homes are sold privately each year.

Access to our accounts will provide evidence of this.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

A large proportion is used on the upkeep of the park and towards the wages of full time wardens. When purchasing the park we were fully aware of the current rules regarding commission and took them into consideration before spending large amounts of capital on upgrading the electrics, installing a new sewerage system, better roads, fencing and landscaping.

We have currently spent far more on the park than commissions received but this could not have been done without the anticipated commission income to repay the cost, and indeed would not have been done if having prior knowledge of the possible removal of the commission rule.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

On many parks it would have a serious impact on both the quality of the park and on employment. Without the commission, to make some parks financially viable, pitch fees would have to improve vastly to compensate and fund the business costs.

Some parks such as ours employ full time warden and ground maintenance staff, with the decrease in revenue their positions would have to be reviewed. Without the staff to carry out the repairs and maintenance plus the obvious cost of having to bring in outside contractors only the most urgent of jobs would get completed. This obviously would have both short and long term impact.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

With the restrictions on pitch fees reviews ways to increase revenue are extremely limited. To mitigate the impact we would seek a pitch fee increase even then we would have to keep park maintenance and upgrade to the minimum that the Mobile Homes Act 2013 Wales requires.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

We have no evidence that the payment of commission by a new occupier affects a resident's ability to sell a park home. It is our experience having spoken to owners selling that negotiation on the sale price takes into account the commission and seems to work just as well as when the onus of paying commission was on the seller. It is also found from our experience that the private sale of a home is often by a home owner's estate following their death.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

One example we have is of a home manufactured in [REDACTED] currently selling privately on plot for [REDACTED] whereas a similar home in the same condition was removed from plot and is currently for sale for [REDACTED] and we have failed to receive any enquiries.

This indicates the rights over the plot on this attractive park adds at least [REDACTED] to the value of the home.

We have evidence of the asking prices for both of these homes which we will provide to Welsh Government.

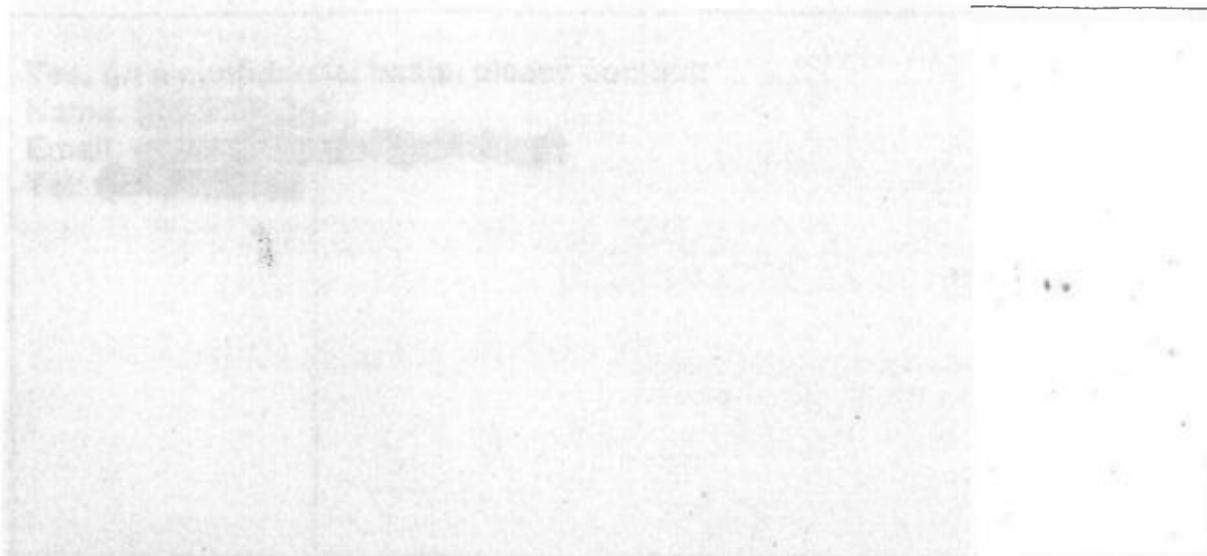
10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Taking away the park owners commission income would result in:

1. Less money spent on maintaining and upgrading parks having a detrimental effect on current home owners
2. Possibility of full time staff losing jobs or on greatly reduced hours, our site for example could lose the security of its current [REDACTED] cover.
3. Devaluing of park business impacting of businesses with lending and on the overall value and attractiveness of investing in residential parks in Wales.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.



12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We have always run our park strictly by the rules and as such it hasn't had a large scale effect on our park apart from a large increase in paperwork to ensure compliance. Also the decrease in pitch fee income due to the restriction in Wales only allowing CPI rises as opposed to RPI. Residents welcome the increased safeguards provided to them.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I have no positive or negative views on this point failing to see how the proposed changes whether adopted or not affect the Welsh language

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I don't feel that the proposed policy could be formulated or changed to affect the use of the Welsh language

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

If the consultation on the changing or abolition of commission finds in favour of abolition, would the Welsh Government put in place any policy to help particularly the smaller parks financially to maintain the standards required to enable the residents to continue to enjoy their current level of environment?

Consultation questions:

130

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.
The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does not attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, the site is on agricultural land which is valued locally at no more than [REDACTED] per acre.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more than pays for the upkeep of the common areas of the site. There are probably some [redacted] units on this site all paying site fees.

We know from Companies House records that [redacted] (our site owners) had a turnover of [redacted] as a [redacted] with pre-tax profits of some [redacted]. Their shareholders enjoyed a joint dividend payment for the year of [redacted]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.

On this basis to further compensate the owners with a [redacted] sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

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7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

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8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

<p>Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with.</p>	
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9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

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10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

--	--

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

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12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We have a genuine concern that if it transpires that the owners of our Park become aware that we have written to Welsh Government to seek the removal of their commissions fee they could make matters very difficult for us. The average owner here is of pensionable age and we cannot afford to be embroiled in any ongoing and upsetting disagreements over this matter. We are seeking assurances from WG that our comments will remain anonymous and confidential.

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Consultation Response Form

Your name: _____

Organisation (if applicable): _____

What is your role? _____

What is your contact number? _____

What is your email address? _____

What is your postal address? _____

What is your telephone number? _____

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

15th August 2017

Private Sector Housing Team
Housing Policy Division
Welsh Assembly Government
Rhydycar

Dear Sirs

Re: Welsh Government Consultation Response Upon the Park Home Commission Rate

On behalf of my wife and I, please find attached herewith my formal consultation response upon the Park Home Commission Rate.

Your acknowledgement in respect of safe receipt of this Email will be much appreciated.

Yours faithfully,

[Redacted signature block]

PARK OWNERS AND DEVELOPERS

Telephone - [Redacted]

After hours - [Redacted]

WELSH GOVERNMENT
CONSULTATION RESPONSE
Upon
THE PARK-HOME COMMISSION RATE

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:
- a. A park owner
 - b. A representative body for park owners
 - c. A park home resident (owner)
 - d. A park home resident (tenant)
 - e. A representative body for park home residents
 - f. Other, please state

Answer:

- 1
a - A park owner

This is the only park which we own, having carried out the ongoing development of the same continuously over the last [redacted] years.

For the last [redacted] years we have regularly won a local prize in our [redacted] for the best business premises and continuously for the last [redacted] years have achieved the covered [redacted] Award within the [redacted]. The infrastructure of our park has been fully completed, inclusive of all tarmacadam roads, laying of bases and installation of main services. Currently [redacted] homes sold and occupied, accommodating a total of [redacted] residents with [redacted] plots available for the siting of new homes thereon.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

- 2
a - Be retained at the current 10% level

We are firmly of the opinion that such should be retained at its current level of 10%

We rely upon the commission received from pre-owned home sales to supplement our Gross Income, enabling us to constantly maintain and upgrade the facilities available on our park and similarly retain the services of a full time grounds man who is responsible for maintaining all communal areas, annually trimming all boundary and internal hedgerows, the latter, all of which planted by ourselves to afford privacy to residents. Our groundsman also reads electricity meters, undertakes much general maintenance and repair works inclusive of repainting, white lining and regular road sweeping with our pedestrian road sweeper. Also assists numerous residents with various problems and predicaments they encounter. In addition we regularly use local contractors for major works on the park including the recent

Continued.....

(2 continued)

replacement of all our street lighting and in recent years the resurfacing of a major section of tarmac roads. Additionally tree surgeons employed with all such works undertaken at our sole expense and no increase reflected in our pitch fee for such. Without the benefit of this additional income we will seriously have to consider cutting back on over heads including staffing on the park, and that of the opening hours of our park office together with that of all the extra time, effort and expense incurred in annually entering into the [REDACTED]

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

3

In [REDACTED] pre-owned homes were sold, in [REDACTED] pre owned homes sold (including [REDACTED] bereavement sales), [REDACTED] pre owned sale (bereavement sale) [REDACTED] preowned sale (bereavement sale), [REDACTED] no pre owned sales, [REDACTED] one preowned sale, [REDACTED] one pre owned sale (bereavement sale).

Expressing the above commissions as a percentage of income for the year ends April [REDACTED] and [REDACTED] excluding income for costs which we pass through at cost ie electricity, water and sewerage, using the fraction:-

	$\frac{\text{£ commission}}{\text{£ commission} + \text{pitch fee} + \text{home sales}} \times 100 = \% \text{ of income}$
Year end [REDACTED]	[REDACTED] + Nil x 100 = 32% of income
Year end [REDACTED]	[REDACTED] + Nil x 100 = 8.9% of income
Year end [REDACTED]	[REDACTED] + Nil x 100 = 12.10% of income
Year end [REDACTED]	Nil commission received.

Suffice to state that in [REDACTED] an unusual number of preowned homes changed hands including [REDACTED] sales following bereavement. The average sales per annum of preowned homes invariable amount to one per annum.

We would particularly mention that the change from RPI to CPI pitch fee reviews in compliance with the Mobile Home (Wales) Act 2013 has had a material inroad into our Gross Fee Income effectively reducing such by some 1.5%. Furthermore our own Chartered Accountants confirm to us in writing that our profits made by our partnership would be significantly affected by the removal of commission income and with no direct salary costs included within our accounts to cover partners respective contributions in respect of most years the inclusion of a modest [REDACTED] managers salary would give rise to a trading loss.

We confirm that we will readily afford the Welsh Government access to our audited accounts, strictly on a confidential basis.

Continued.....

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

4

Commission income received by ourselves as park owners, as indicated in question 3, obviously varies from year to year dependent upon the number of home that become available and as and when they are sold. Many of our sales arise following the bereavement of the former resident/residents.

We present here below the number of commission sales as a percentage of all privately owned homes upon our park for the years: [REDACTED]

Year	Private Sales (Commissions)	% of total of Pitches Occupied
[REDACTED]	[REDACTED]	12.5%
[REDACTED]	[REDACTED]	3.33%
[REDACTED]	[REDACTED]	3.33%
[REDACTED]	[REDACTED]	Nil
[REDACTED]	[REDACTED]	3.33%
[REDACTED]	[REDACTED]	3.57%
[REDACTED]	[REDACTED]	3.57%

This averages out over the [REDACTED] years at 4.23%

Business Planning

Commission income derived from pre owned park homes sold is dependent upon market forces including that of both supply and demand. Based on past experience and as previously indicated this effectively averages at one preowned park home commission arising per annum.

Over a period of years and corresponding with the receipt of commission income we have both purchased new equipment for the park and similarly replaced older and worn out maintenance equipment. Such items include that of a dumper truck, motorised pedestrian road sweeper, a wood chipper/shredder to support on site recycling of all hedge cuttings together with replacement of lawn mowers, strimmers and hedge trimmers.

Several years ago the decision was taken to enter into the [REDACTED] which has resulted in receiving the coveted [REDACTED] for some [REDACTED] (result of current years judging awaited). The cost of competing in such would not be cost effective without receipt of commission income, given that of the extra and well above average costs entailed in both additional planting, nurturing, maintenance together with the cost of construction of [REDACTED] and [REDACTED] etc all of which have been affixed throughout the park.

In addition, without commission income, it is fair to say we would not have undertaken the following works in recent years:-

- Replacement of all pre-existing street lamps upon the park
- Laid a substantial tarmacadam overlay over an existing park road to eliminate water ponding. Original tarmacadam was in good order.
- Regularly supported several of our residents in various charitable fund raising activities in particular that of charity walks.

Continued.....

(4 Continued)

Evidence

We confirm that we will give access to representatives of the Welsh Government to inspect our audited accounts, strictly upon a confidential basis.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

5

Developing our park in various phases over a period of years along with other income, commission income has been used to fund the business contributing towards the general upkeep of our park in respect of which we take major pride.

Great emphasis is provided upon maintenance/repair with major considerations afforded to health and safety and of paramount importance that of the safety of all our residents upon our park.

We have previously mentioned within question 4 Capital expenditure in respect of both purchase and replacement of plant/machinery/equipment and similarly indicated that in the absence of income commission serious consideration will have to be given to major cutbacks in staffing resulting in our full time maintenance employee having his hours substantially curtailed and similarly that of the manning of the park office purely on a part time basis.

Currently we maintain [REDACTED]

[REDACTED] The cost of maintaining these [REDACTED] is something which we have absorbed from their original installation many years ago, but with ongoing health and safety considerations and that of increasing maintenance costs, without the benefit of any income commission serious consideration will be given to the removal of the said [REDACTED] which in turn will be a major detriment to all residents on the park unless, of course, they are prepared to accept such costs as legitimate expenditure resulting in a substantial increase in our pitch fee.

In recent years we have, without exception, hired in [REDACTED] [REDACTED] for the annual [REDACTED] and also co-opting the services of outside labour to assist our maintenance employee in undertaking such works. Suffice to state without commission income being derived this annual trimming would, in essence, not be undertaken.

Evidence

We confirm that we will give access to representatives of the Welsh Government to inspect our audited accounts, strictly upon a confidential basis.

Continued.....

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

6

Please refer to question 3 to support how important in percentage terms the commission income is to our business. Our Chartered Accountants have confirmed to us in writing that the profit made by our Partnership would have been significantly affected by the removal of commission income and with the park run as a partnership there are no direct salary costs included within the accounts to cover partners' respective contributions. Even the inclusion of a modest [REDACTED] Managers salary would give rise to trading losses were commissions to be excluded. This fact in turn will then have substantial repercussions upon maintenance, repair together with replacement and capital spending plus that of staffing and administration.

Evidence

We confirm that we will give access to representatives of the Welsh Government to inspect our audited accounts, strictly upon a confidential basis.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

7

To mitigate the potential loss of income commission serious consideration will have to be given to the following:-

Major reduction in park maintenance and repair – Purely undertaking the basic minimum in order to comply with one's legal requirements and the terms of our Site Licence. Currently we substantially exceed such for the benefit of all residents. Similarly the replacement of capital items including plant machinery and equipment will be completely abandoned, capital expenditure substantially curtailed to a minimum and as indicated previously staffing level substantially cut with both maintenance and office staff purely working part time.

Within the foreseeable future substantial replacement costs will be required to upgrade/replace our existing underground sewerage pumping station and similarly that of the [REDACTED]. Obviously the bare minimum will be undertaken to comply with one's statutory obligations without receipt of the benefit of commission income.

In the event that the Welsh Government deem it justified to reduce one's commission income entitlement one will be forced out of choice to make application to the Tribunal to be compensated via one's pitch fee to a substantial increase in order to both operate efficiently and safely as a park home operator.

It goes without saying that with the potential loss of commission income all our residents (home owners) will substantially suffer as a result of:-

Lost services

Substantially less maintenance

Delayed and far slower repairs

Deletion of annual hedge trimming to all hedgerows both surrounding and within the park, reducing such operations to once every three years which in turn will have a substantial impact on the infrastructure amenity and community of the park.

Continued.....

(7 continued).

Virtually eliminate our constant and ongoing help facilities provided to all our residents FREE of CHARGE. This will undeniably impair the long standing good park owner/home owner relationship established over a long period of years.

Evidence

We confirm that we will give access to representatives of the Welsh Government to inspect our audited accounts, strictly upon a confidential basis from which they will then appreciate the extent of necessary Capital Expenditure and ongoing expenses required to maintain our park in a similarly condition to that which it now prevails, supported by receipt of the accolades from [REDACTED] and similarly other local [REDACTED]

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

8

Based upon our experience as park owners continuously since [REDACTED] in the majority of cases, it is not the home owner who sells the home, rather more accurately that of their estate.

Over the last [REDACTED] years out of [REDACTED] sales of pre-owned homes upon our park, [REDACTED] sales arose following bereavement, [REDACTED] of which were sold by the homeowner's estate, either their Executors or representatives and the remaining [REDACTED] sold by a surviving spouse. Analysing the above sales by the home owners estate the same equates at 50% of all sales during the relevant period.

Our park accommodates numerous elderly persons, many of whom reside on their own, some of which purchased their homes retrospective to [REDACTED]. The residents on our park provide a very supportive community to all their neighbours, and with the interactive environment and amenities afforded by the nearby village including that of local shops, supermarket, chemist, post office, bus stop and railway station together with public houses and places of worship.

Numerous homeowners indicate their preference to a commission as a deferred payment rather than funding their home at the time of purchase or from that of savings or pension income.

Any changes by the Welsh Government would have a material downside for both the buyer and other home owners on the park. The buyer would be paying the same price and so would be no better off. However, both buyers and all other home owners who are not selling maybe worse off if they may stop benefitting from the work and services which the park uses the commission to fund at the moment. See our responses in question 7.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

9

We are unable to quote prices for the value of home older than [REDACTED] given the fact that this is the age of the oldest upon our park. Based upon resale values of such, literally every sale of preowned homes has attained a not dissimilar price to that originally paid for when it was new.

Continued.....

(9 continued)

To consider the value of un-sited park homes ie ones without a pitch, one has to take into account the long standing and vigorously monitored Town and Country Planning Regulations precluding the siting of park home or caravans on land without planning consent. Such consent not readily forthcoming creating a situation that older park homes un-sited have a very limited resale value with the only purchasers in the market for such are either that of dealers or potentially persons building their own home on a pre-purchased building plot and obtaining a temporary consent for the Local Planning Authority to site a caravan thereon during building construction.

Having developed our park from scratch we are only too familiar with the extensive and most onerous costs involved in the provision of roads and access ways together with the infrastructure costs including that of all services laid underground, such costs could not have been afforded without the dependency upon future commission income arising.

One only has to look at the price of building plots currently available in the locality ranging in the region of [REDACTED] to [REDACTED] before one even considers the cost of bringing in services let alone the cost of building.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

10

In our opinion the consequences of the potential reduction/abolition of the commission will have major repercussions upon the park home industry entailing that of the desecration of such resulting in an abundance of run down, un-maintained parks in all to the major detriment of the various homeowners (residents) living there on.

In the event of the Welsh Government proposals to reduce or abolish ones current entitlement to compensation in our view such will create a situation that parks will not be viable to continue operating on the current basis, inducing one to sell such in the open market, assuming of course there is anyone interested in acquiring such given the major on-going maintenance liabilities and responsibilities imposed upon park owners, including that of Site Licensing implications. Our own Accountants have provided us with a letter which we will provide Welsh Government access to peruse in confidence supporting our unenviable position in the event of a potential reduction/abolition of the commission.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

11

We confirm that we will readily afford access to our accounts, strictly on a confidential basis to authorised representatives of the Welsh Government and arrangement for such can either be made by:-

- a) [REDACTED]
- b) [REDACTED]
- c) [REDACTED]

Continued.....

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

12

Conducting a responsible business one is committed to meeting the new requirements of the Mobile Home (Wales) Act 2013 notwithstanding the fact that the implications of such have imposed a considerable amount of additional administration upon park owners including:-

- a) Loss of literally 1% on the annual rent review following imposition of CPI as opposed to RPI. Effectively an annual loss of Gross Income of some 1.5% to us.
- b) The time expended (plus costs) to prepare and serve an eight page pitch reviews annually together with form filling and service of Notices.
- c) The extent of time expended and cost involved in site rules and consultations.
- d) Fit and proper person licenses, again time and cost involved both to ourselves and the Local Authority, plus the cost of licensing and renewal of such.
- e) Private sales process. In respect of such we, as park owners, are precluded from any involvement. Suffice to state the implications also have placed a substantial and additional cost and unnecessary additional costs upon home owners desirous of selling including:-
 - i. Estate Agents fees between 1.5% and 2% plus VAT
 - ii. Incurring solicitors costs to undertake the requisite documentation completion. A local firm of solicitors undertaking such for a fix fee of [REDACTED]

All these costs coming out of the home owners pocket.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

13

We have not identified any impact

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

14

We have no suggestions

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

15

We have previously focused upon the major implications in the event of a reduction or potential removal of commission entitlement. Park owners will suffer a major financial disadvantage which will also reflect in the re-sale value of their parks. Similarly it will, given the unneighbourly reduction in services and standards on park, reflect on the saleability of the individual home owner's park home to their major disadvantage.

Continued.....

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The information provided is strictly on the understanding the same is private and confidential.



Response to the Welsh Government Consultation Document WG31760

The Park Homes Commission Rate

The NCC (National Caravan Council) is the UK trade association representing the collective interests of the leisure accommodation vehicle industry (touring, motorhome, caravan holiday home) and the residential park home industry.

The industry overall has a turnover in excess of £6 billion, employs over 130,000 people and serves over 1 million caravanners, over 330,000 holiday home owners and in excess of 3,450 residential park home households in Wales¹.

Our members include over 90% of the UK manufacturers of tourers, motor homes, caravan holiday homes and residential park homes (mobile homes) along with park owners, dealers, and suppliers and service providers.

In this context, the response is made on behalf of our membership comprising residential park home (mobile home) manufacturers, residential park operators and suppliers of services and products to the sector.

The responses to the questions below are taken from the experiences and knowledge of residential park members and professionals that represent them.

Consultation questions:

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

- b. A representative body for park owners.

¹ PACEC

The National Caravan Council (The NCC) is the UK trade body for the touring caravan, motorhome, caravan holiday and residential park home industries. See above.

2. Should commission on the re-sale of park homes in Wales:

- a. be retained at the current 10% level
- b. be reduced
- c. be abolished
- d. other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Answer:

a. Be retained at the current 10% level

Commission is a crucial element of income received by a park business and must be viewed in line with other sources of revenue and set against all relevant business costs. The published evidence from earlier independent research¹ commissioned by Welsh Government points to park businesses in Wales making a loss, with Government's own forecast for the sector in the Explanatory Memorandum to the 2013 Act² suggesting that any reduction or removal of such income could lead to 'less money being invested in park facilities' and make park home businesses 'unviable in some areas'.

In the absence of any evidence to indicate otherwise, the reduction or removal of a vital income stream will impact heavily on the businesses' ability to invest in and maintain a quality service. We are also advised that any reduction in, or abolition of, commission would impact heavily on the capital value of the park business, and this in turn would impact on the overall value of each park home sited on a park. Where a business is heavily leveraged this may force the owner to sell at a reduced price to acknowledge the lack of commission and open up the business and the existing residents to new owners with potentially different management values and a substantial increase in pitch fees.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Answer:

This will depend upon a number of factors including the size of the park business (surface area and number of homes) and a range of commercial, economic and personal factors which will influence the decision of home owners to sell up and move on. As the park home industry aligns closely with the general housing market this will fluctuate from year to year.

¹ PACEC

² Explanatory Memorandum for the Mobile Homes (Wales) Act 2013

Most residential parks have a minimum age requirement e.g. 55 years plus. In such circumstances, the majority of park home owners will have lived there for a number of years; with the sharp increase in longevity, for many it is the penultimate residence before moving to residential care, or even their final residence. In this scenario the park's ability to develop new pitches and or sell new homes is limited and the income generated to maintain services, infrastructure and the amenities enjoyed by residents is reliant purely on pitch fees and intermittent commission to cover all costs.

As has been demonstrated through recent changes to the economic indices for determining pitch fee reviews, pitch fees have already reduced in real terms. We are advised that commission can contribute up to 30 percent of a park's total income, but as pitch fee income continues to be correctly regulated under the legislation, the reliance on income from commission will become more significant to maintain quality park businesses moving forward.

4. On average, how often is commission income received by a park owner? i.e. how often are preowned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

Answer:

As outlined in the response to question 3 this largely depends on the age profile of the home owners on the park and relevant economic, commercial and social factors in any one year. We are advised that across the UK commission sales as a percentage of the total number of park homes on a park can be between 5 and 10 percent i.e. one home in 20 on average. Income received is built into funding plans for maintenance and improvements and work scheduled accordingly. In respect of valuing a park, we are advised that an average of historical commissions received are considered, and this is reflected in the adoption of an EBITDA (earnings before interest, tax, depreciation and amortization) before capitalising.

5. How is the commission income received by a park owner used? Please give examples and supporting evidence where available.

Answer:

Commission income is one element of the overall funding for the park and is paid into the same 'pot' as that for income generated through pitch fees and new sales on the park. The outgoings of a park in relation to the ownership and operation will include:

- maintenance and repair
- replacement, improvements/ capital spending
- employment and administration such as maintenance staff and on-park wardens
- utility supplies and infrastructure not adopted by the utility companies
- repayment of loans to maintain the quality and viability of the park

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Answer:

As referenced earlier in this response, any change to the payment of commission will impact on the park businesses' ability to invest and maintain a quality, accessible housing option, significantly impact on the value of the park and the homes sited on the park. As the viability of the business diminishes, this may force reputable park owners such as those in membership of the NCC to consider selling up and moving on, placing the business and the existing home owners at risk of unscrupulous operations. The PACEC research supports this assertion.

7. How might a park owner seek to mitigate the impact of those risks to the short or long-term viability of their site? Please provide any evidence you may have to support your view.

A reduction in or the abolition of the payment of commission may result in park owners:

- looking to recover costs, which otherwise may have been absorbed by other means, through the pitch fee review provisions;
- looking to review their borrowing to cover the costs of a reduced income stream
- reducing the support on-park – either personally or through dedicated staff – in an attempt to manage costs and reduce overheads
- reviewing their commitment to the industry and either sell up or move towards an alternative business model offering assured shorthold tenancies in place of the longer term security offered by the Mobile Homes legislation.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Answer:

Private sales of park homes have attracted a commission payment for over 40 years since the introduction of the first Mobile Homes Act in the mid-1970s. We have no evidence to suggest that the payment of commission affects the ability to sell, but it will have an impact on the amount received by the seller at the end of the transaction. The seller will have been made aware of the payment of commission as part of the agreement to purchase, and will have recognised that this 'deferred payment' has contributed to making the home more affordable at the point of purchase.

The obligation to pay commission on the sale of a park home is further highlighted through a revised and transparent process introduced by the Mobile Homes (Wales) Act in 2013.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Answer:

A park home is situated on a pitch with the benefit of a Mobile Homes Act agreement which provides security of tenure until the agreement is terminated. Its value stems from this together with its location (land values vary across the UK in common with bricks and mortar residential accommodation), the condition of the home and the facilities available both on and close to the park. For older homes, some of which may no longer feature in the trade guides, the percentage of the value when sold on a pitch on a park with the benefits and rights under the Agreement will have increased against rapid depreciation without.

To help establish the 'value' a pitch brings to a park home, one can compare the 'price provided by the trade guide *Glass's Caravan Guide* which quotes values for homes 'off-park and un-sited' against the value of a home for sale and marketed on a pitch on a park. The difference between the two, taking account of all relevant factors, can be anything between 80 and 89 percent more for a park home on a pitch on a park against a park home un-sited.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Answer:

In addition to the comments which appear earlier in this response, our only other observation is the potential precedent which may be set if park home owners are able to change the terms of their contractual obligations retrospectively.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Answer:

The NCC makes this response as the representative trade body for the residential park home industry comprised of park businesses, manufacturers and suppliers and service providers to the sector in the UK. As such we are unable to respond in full to this specific question, but we have encouraged all affected residential park members to engage fully with Welsh Government, and to respond to this consultation (as they did in the earlier consultation and independent research) and suggest they invite Government representatives to visit their businesses and explore matters in more the detail.



12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Answer:

The introduction of the Mobile Homes (Wales) Act 2013 MHA '13 has provided increased statutory powers for local authorities and more transparency in relation to processes and procedures, site rules and private sales. With changes in procedure comes inevitable but, sadly, significantly increased administration, time scales, cost and confusion.

Of particular concern is:

- the apparent failure by the majority of local councils in Wales to publish site rules so that they are accessible to all in the public domain, and particularly new buyers
- the impact on pitch fees of the move from RPI to the CPI index. In sharp contrast to pension income which, by virtue of the triple lock guarantee of an annual increase of at least 2.5 percent, rose by just over five percent (5.06%) between 2015 and 2016, pitch fees have increased by less than one percent (0.72%)
- the lack of appropriate professional support for owners and prospective purchasers in a largely prescriptive and complex sales process, despite the best efforts of organisations such as the NCC to promote to consumers/buyers the importance of obtaining proper professional legal advice.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Answer:

We do not offer any comment on this point.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Answer:

We do not offer any comment on this point.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Answer:

Wales as part of the United Kingdom is facing an uncertain future following the decision of the 2016 referendum to leave the European Union. Further uncertainty for park home owners and park owners in respect of funding to support a popular housing tenure and lifestyle is unacceptable, particularly if the outcome is for respectable park operators being forced to sell up and move on leaving the park business at potential risk.

The *'long-term viability of the park home sector in Wales'* as reported in the statement to the Welsh Assembly by the Cabinet Secretary for Communities and Children in March 2017 lies in the balance.

We urge the Welsh Government to reconsider the proposals but to review the economics of the park home industry in Wales, not only to ensure that 'long-term viability' but to preserve a popular and valuable housing tenure at a time when housing choices and availability is at a premium.

Consultation Response Form

Your name: [REDACTED]
Organisation (if applicable): [REDACTED]
Address: [REDACTED]
Postcode: [REDACTED]

[REDACTED]



154

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.
 The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does not attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, the site is on agricultural land which is valued locally at no more than ~~£10,000~~ per acre.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more than pays for the upkeep of the common areas of the site. There are probably some 150 units on this site all paying site fees.

We know from Companies House records that [REDACTED] (our site owners) had a turnover of [REDACTED] as a 30th April 2016 with pre-tax profits of some [REDACTED]. Their shareholders enjoyed a joint dividend payment for the year of [REDACTED]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.

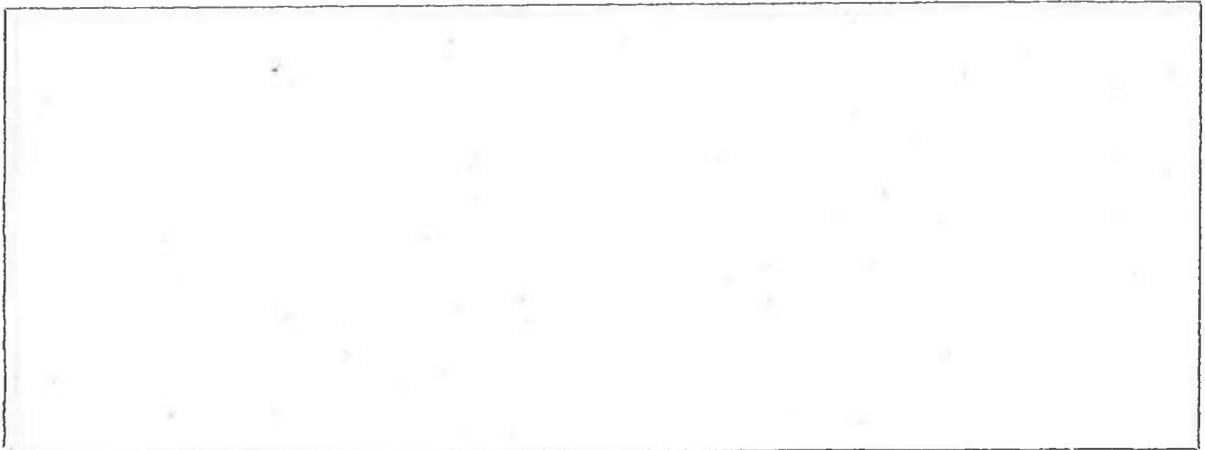
On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

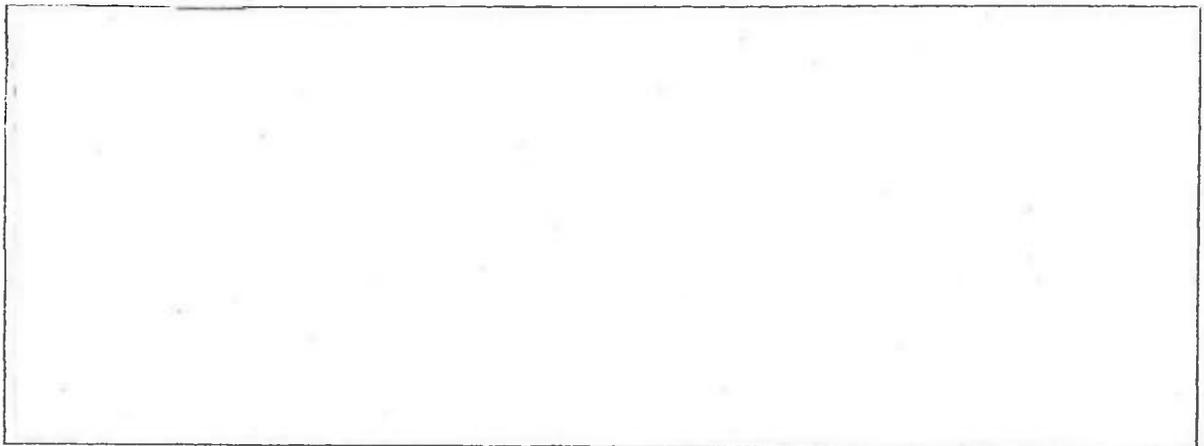
7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with



10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.



11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

Consultation Response Form

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.
 The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does not attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, the site is on agricultural land which is valued locally at no more than ~~£20,000~~ per acre.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more than pays for the upkeep of the common areas of the site. There are probably some [redacted] units on this site all paying site fees.

We know from Companies House records that [redacted] (our site owners) had a turnover of [redacted] as a 30th April 2016 with pre-tax profits of some [redacted]. Their shareholders enjoyed a joint dividend payment for the year of [redacted]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.

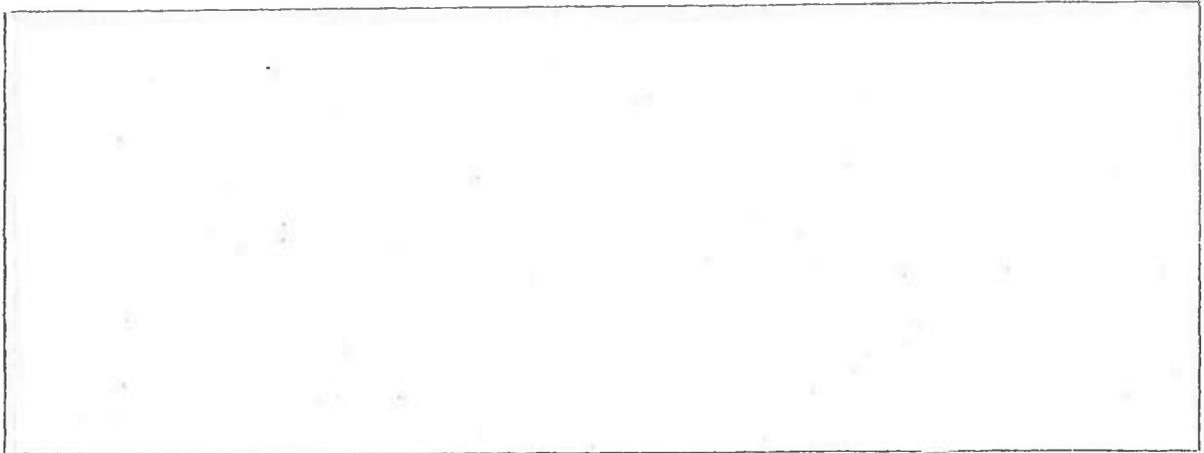
On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

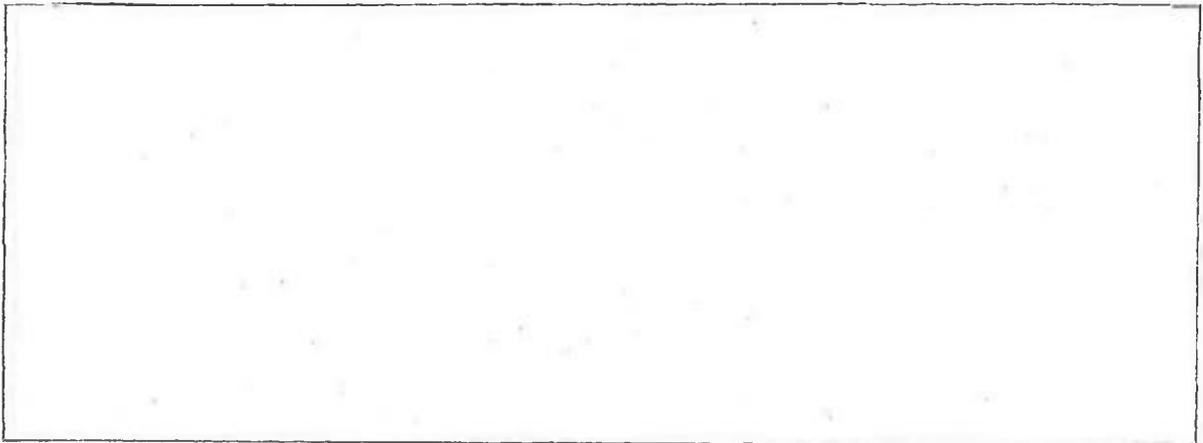
7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with.



10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.



11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

Consultation Response Form

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C: A Park Home resident

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

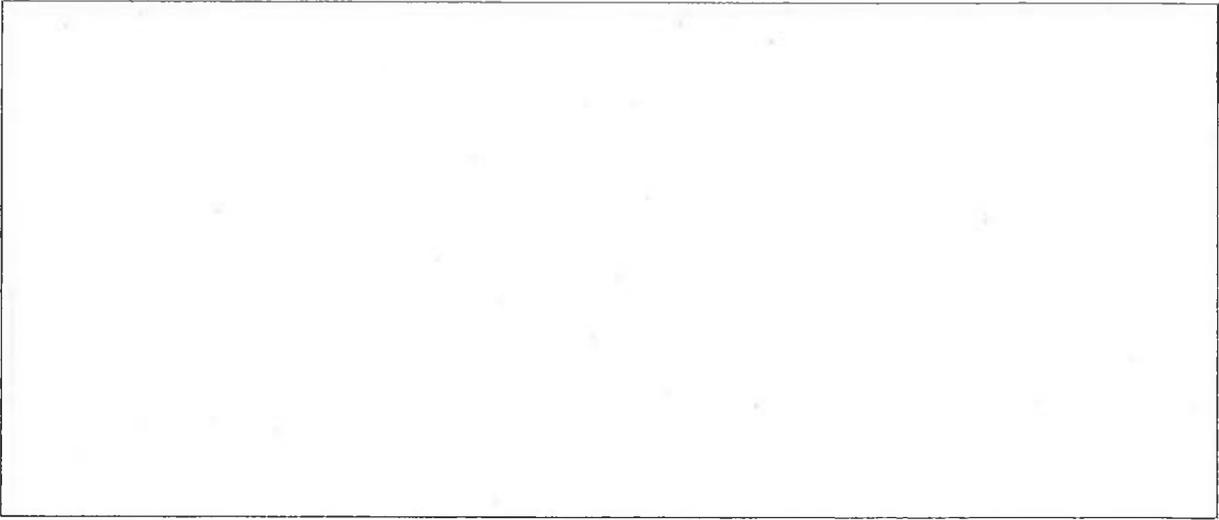
B: Be Reduced

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

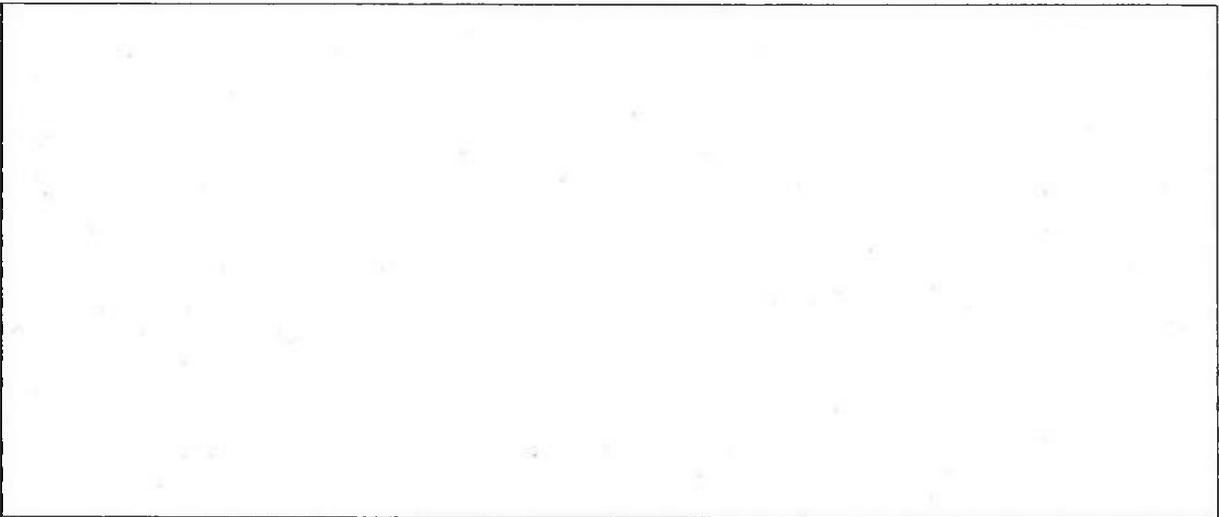
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5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It makes the sale of the Park Home more difficult as both the buyer and seller see this commission as unearned income to the Park Site Owner

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Given the frequency of sales, on this site, The owner cannot take this income into account for any plans on the site. It is simply a bonus. In view of the impending changes he has proposed all residents allow him to make the first offer on sales. This will have the effect of "cherry picking" and offering reduced prices for cash, often to the remaining relatives of the dead.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Consultation Response Form

Your name: _____
Organisation or association: _____
Email / telephone number: _____
Your address: _____

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The representative body of the parks industry including
caravans, chalets, lodges, park homes, tents and
all types of self catering accommodation



BRITISH HOLIDAY & HOME PARKS ASSOCIATION LTD

Chichester House, 6 Pullman Court,
Great Western Road, Gloucester GL1 3ND

The Park Homes Commission Rate

Telephone: (01452) 526911

Tel. fax: (01452) 508508

Email: enquiries@bhHPA.org.uk

BH&HPA Members' Web: www.bhHPA.org.uk

Consumers' Web: www.ukparks.com

EXECUTIVE SUMMARY

1. Recent policy developments for the park home sector in Wales include:
 - the commencement of the Mobile Homes (Wales) Act 2013, introduced despite an Explanatory Memorandum which forecast, even with the commission rate maintained at 10%, it 'may make the park homes business unviable in some areas' (para 279), a 'detrimental effect on site profitability', leading to 'less money being invested in park facilities' and noting the impact where Welsh residential parks 'become unprofitable in the long run' (para 291)ⁱ.
 - Welsh Government's publication of independent researchⁱⁱ in 2016 indicating that seven/eight Welsh residential parks - 8.5% of the total - made a loss in 2013/14 and 2014/15
 - the current Welsh Government consultation seeking to assess the impact of removing or reducing a vital revenue stream from Welsh residential parks.
2. BH&HPA's response explains that any reduction in the commission rate would solely benefit park home sellers, many of whom are the beneficiaries of homeowners' estates. Any reduction would disadvantage all other homeowners, park home buyers and residential park businesses in Wales.
3. We provide further evidence of the precarious economics of Wales's micro- and small residential park businesses which are already unsustainable and forecast the impact of any reduction in commission. This confirms that any reduction threatens the viability of residential park businesses in Wales, the smaller the business, the greater the impact and the greater the likelihood of business failure. We describe the economic and social impacts of this.
4. We therefore call on Welsh Government to review the industry's economics in the round to address the steps necessary to ensure, in the words of the Cabinet Secretary for Communities and Children, 'the long-term viability of the park home sector in Wales'ⁱⁱⁱ.
5. We also underline concerns at the wider implications for Welsh businesses if lobby of the Welsh Government were to result in consumers' ability to renege on contractual obligations agreed to freely with full information.



President
Professor
David Bellamy CBE

Director General
Ros Pritchard OBE
MBA, BSc(Hons), DipM, MSc



Member, European Federation
of Campsite Organisations
& Holiday Park Associations

Registered Office - as above Registered No 713398 England

CONSULTATION QUESTIONS

1. Are you:
 - a. A park owner
 - b. A representative body for park owners
 - c. A park home resident (owner)
 - d. A park home resident (tenant)
 - e. A representative body for park home residents
 - f. Other, please state

6. b. The representative body for park owners The British Holiday & Home Parks Association (BH&HPA) is the trade organisation representing 1,752 members who own and manage 2,929 holiday and residential parks across the UK. 31 BH&HPA members own and manage 38 residential parks in Wales, providing 1,450 pitches for park homes.
7. A key part of BH&HPA's role is to help our members comply with the significant changes to mobile homes law summarised in the consultation. Many of our members are family business owners who live on or near their parks. We anticipate and help them address the practical effects on the homeowners who share their community. We are therefore very experienced in identifying the unintended consequences of reforms:
8. PACEC reports that there are 88 residential parks accommodating 3,430 park homes in Wales. This means that BH&HPA members represent a minority – 43% of the parks and 42% of the homes.
9. PACEC also notes that 91% of the park responses to their survey came from BH&HPA members. Some 90% of all BH&HPA members with residential parks in Wales engaged with their research. By any measure, 90% is an incredibly high response rate demonstrating the depth of concern amongst the responsible owners of residential parks in Wales.
10. 22 park respondents provided accounting information for PACEC's analysis. Given the group operations of whose responses we are aware, this means PACEC analysed accounting information from 28.4% of all residential park business in Wales and 66% of BH&HPA member parks. Given the complexity and commercial sensitivity of the information sought, this is again an extremely high response rate, again indicating the profound concern amongst responsible park business owners.
11. It is important to consider why some park businesses may not be engaging with this business-critical research and consultation. There are two groups which are likely to be under-represented.

Micro- and small businesses

12. PACEC notes micro- and small park businesses are home to 45% of all park homeowners in Wales.
13. PACEC's and our evidence shows that some micro-businesses are already unviable. Due to their size, they would also be worst impacted by any reduction in the commission rate, yet their economic position is least well researched and understood. The under-representation of data from micro- and small businesses is confirmed in para 5.12 of the PACEC report and is likely to be mirrored in responses to the current consultation.

14. Only 31% of these micro-businesses hold BH&HPA membership.
15. Their economics mean they may not employ accountants able to produce accounting figures in the way envisaged by the consultation and PACEC. Most will be sole-trader lifestyle businesses who account to HMRC through the property pages of their personal income tax return, in simple summarised figures.

Business ethics

16. Given the application of BH&HPA membership standards, park owners whose conduct is '*calculated or likely to bring the member ... into disrepute*' are barred from membership. Such conduct is established using objective criteria and the procedure for decisions to terminate BH&HPA membership adhere to the rules of natural justice. Through this work, we are aware of groups operating at least six residential parks in Wales who would fall into this category, so some 7% of all residential parks in Wales.
17. This category is also less likely to engage with the research and consultation. The conduct and so economics of their businesses will reflect their moral code. As such, they should not be considered as representative of responsible park businesses in Wales.
18. Rather they may reflect shortcomings in the fit and proper person licensing system. All residential parks in Wales are now deemed fit and proper^{iv}, yet some businesses currently holding these licences are controlled by people who have been barred from BH&HPA membership. We are also aware of people licensed to manage parks who have been barred from BH&HPA membership.
19. Great care is essential to ensure that responsible park businesses are not '*tarred with the same brush*' as the so-called rogues. Equally, any decision by Welsh Government should not penalise bona fide businesses so that only these so-called rogues can prosper in the park homes industry in Wales and potentially take over more parks. This would be very much against the interests of homeowners.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

20. a. Be retained at the current 10% level Commission should be retained at the current 10% level in the interests of:

- homeowners
- park home buyers
- residential park business.

Our answers to the questions below explain why.

21. 10% is the level which homeowners agreed to pay when they purchased their park home.

22. Having undertaken independent research into the industry's economics, Welsh Government appears to have disregarded the objective findings. It is difficult to know how to respond to industry members' criticism that Welsh Government is disregarding its own independent research simply because the findings do not support a political case.

23. There is no evidence to question the findings of the PACEC report which found seven/eight park businesses were making a loss, that is 8.5% of all residential parks in Wales. Given this, the focus of Welsh Government's consultation proposals should surely be the steps necessary to safeguard the viability of residential parks in Wales.

24. It is also of concern that the economics of park home business have not been addressed in the round. Commission is one source of income; it must be considered along with other revenue and against the business costs. It cannot be viewed in isolation.

25. The Explanatory Memorandum for the Mobile Homes (Wales) Act 2013 forecast, even with the commission rate maintained at 10%, that it '*may make the park homes business unviable in some areas*' (para 279), a '*detrimental effect on site profitability*', leading to '*less money being invested in park facilities*' and noting the impact where Welsh residential parks '*become unprofitable in the long run*' (para 291). These impacts need to be properly assessed, before suggesting the reduction/removal of a vital source of income.

26. Reducing income to any business inevitably reduces the ability to invest; therefore the only certain outcome of proposals to abolish or reduce commission income will be to reduce the quality of parks whilst increasing the number making a loss and failing. All stakeholders would be affected since a reduction in park quality will affect not only the value of the park business, but also the value of the homes sited upon it. As well as the opportunity for the so-called rogues to increase their portfolios, loss-making parks also create the potential for adverse social and environmental consequences (e.g. how would sewage treatment plant replacement or electric/gas/water infrastructure repair/renewal etc be funded?).

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

27. The income streams for residential park owners are closely regulated by the Mobile Homes (Wales) Act 2013.
28. Whilst this close regulation is right given that residential parks are often home to elderly and other vulnerable people, the controls do not allow income to the business to keep pace with costs.
29. The pitch fee is a hybrid of a ground rent and a service charge used to fund maintenance and replacement of the park infrastructure. This hybrid nature was examined and confirmed by the Court of Appeal in 2003 when it recognised that the pitch fee funds services as well as the ground rent⁴.
30. In other housing regimes, controls are in place to ensure fairness *and* that the landowner is able to recover their maintenance costs under the service charge in the interests of all occupiers – i.e. to ensure that the landlord will be able to afford to carry out the necessary work. This is not the case for pitch fees on residential parks.
31. Once a park is developed so there is scant or no opportunity to generate income from home sales, the residential park business is entirely reliant on income from pitch fees and commission to fund all costs.
32. Furthermore, the change from reference to RPI to CPI in pitch fee reviews introduced by the 2013 Act has already caused a significant reduction in pitch fee income and is likely to continue to do so.
33. This is a compound effect which will cause a significantly greater reduction in pitch fee income over time than the simple difference between the RPI and CPI rates each year. This is because the pitch fee adjustment takes place annually, meaning that the lower adjustment in the following year will start from a lower figure.
34. Our members already report that this reduction in income has a bearing on their ability to carry out maintenance and we are only two years into this significant change. Quite simply parks' suppliers and employees are not subject to the same regulation and costs are running ahead of income.
35. No income stream should be viewed in isolation. It is premature to be considering reforms to commission (the other principal income stream for residential parks) before the effect of this first change to pitch fee income has been properly quantified and its impact assessed.
36. It is in the interests of homeowners that the income streams of responsible park owners such as those in BH&HPA membership remain sufficient to ensure they can maintain the services and amenities currently enjoyed. Given that pitch fee reviews already fail to keep pace with rising costs, we anticipate that park owners will need to place increased reliance on their income from commission to carry out essential maintenance in the years to come.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

37. In our experience across the UK, commission sales as a percentage of privately owned homes on a park run at some 5% per year, i.e. one home in 20 is sold on average each year. As the park owner receives 10% of the sale price of those homes, the income stream represents half a percent (0.5%) of the value of the homes on the park.

38. Whilst a park can rarely be sure *which* homes will change hands in a given year, experience means they can be reasonably confident of the average on their park over time. The income from commission is included in plans for maintenance, replacements and improvements. Such planning is over a period of years, the timing of the work may depend on the timing of the commission receipts.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

39. Park businesses do not treat commission as a separate income stream but as part of their core funding – it all goes into the same account!

40. In many cases borrowings must be paid first. This means that a loss of, or reduction in, the park's income from commission would force the park owner to make difficult choices between competing expenditure which homeowners regard as being of equal importance:

- maintenance/repair
- replacement and capital spending
- staffing/administration, such as the employment of a warden to provide support to homeowners.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

41. In the short term and as we have already explained, the loss of the park's income from commission would force the park owner to make difficult choices which would concern their homeowners.
42. In the medium term, we are concerned that the profile of park ownership in Wales may change. Residential parks provide an important housing service to elderly and other vulnerable groups which helps them live independently for longer in their own homes as part of a supportive park community.
43. The relatively low cost of purchasing a park home also enables homeowners to release capital from bricks and mortar property to provide funding for their retirement. However, the business model requires careful management to be viable, in part because it is so closely regulated. BH&HPA and its members recognise the need for protection through regulation. However, it is vital to recognise the unintended consequences of changes to the current delicate balance.
44. A loss of park income caused by the loss of, or reduction in, commission is likely to make many park businesses less attractive to the reputable park owners who form our membership. The PACEC research has already identified park businesses making a loss in the last two years. If further income is lost, more businesses would become unviable, particularly where the park owner has significant bank borrowings. These park owners may struggle to make repayments or breach banking covenants if the value of their park is reduced to reflect the lost income.
45. The obvious risk is that parks will be forced onto the market. In our experience, the marketing and sale of a park is an anxious time for many elderly homeowners. Reputable park owners such as our members work very hard to keep their homeowners happy and they are often on very good terms. The news that a park owner is moving on can be unwelcome, particularly if there is a perceived risk of a new park owner not sharing the same family-oriented business model.
46. Most residential parks coming onto the market since the legal changes in 2013/14 are purchased by a small group of operators whose business approach does not permit them access to BH&HPA membership. Where a park purchaser intends to use *any* means to create profit from sales opportunities, they can offer a higher purchase price to recognise the returns they anticipate. As such, a rogue will always outbid a responsible park investor. As already explained, the introduction of fit and proper person licensing has presented no barriers to their purchase and operation of parks in Wales.
47. Assembly Members have highlighted the huge problems that would follow a considerable, sudden exit of bona fide business people from the sector. That is inevitable if the commission rate is changed. One of these changes would be an increase in parks operated by the so-called rogues.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

48. As highlighted in our reply to question 6, we are concerned that some reputable park owners may simply sell to others with unscrupulous business models.
49. Others will make the difficult choice we discuss in question 5 between competing equally important forms of expenditure.
50. Most will also consider replacing a reduction in their second income stream by increasing the first, i.e. by increasing the pitch fee. The implied terms in the 2013 Act will allow parks to increase pitch fees to reflect this significant loss. However, we are concerned at the uncertainty and anxiety that a significant increase would cause to homeowners. Many may feel that this is not the 'deal' they signed up for when they agreed to buy a low-cost park home and pay a low-cost pitch fee, deferring part of the cost until they or their successors sold it again.
51. They did not agree to pay the sort of 'market rent' which park owners faced with a loss of commission would need to charge.
52. We are also concerned that many homeowners will not have the means to meet a significant increase. In these cases, park owners would then face difficult decisions about whether to take steps to recover payment.
53. Higher pitch fees would also make park homes more difficult to sell, both by parks and by current homeowners.
54. Whilst we expect significant increases in pitch fees, we do not expect they would fully replace a loss of commission income meaning that homeowners would face a combination of increased cost and the reduced levels of amenity/services we have already described.
55. Not least therefore, we would anticipate a downward spiral in the relationship between homeowners and the park business where they reside, more acrimonious cases before the Tribunal and potentially a sector in terminal decline.
56. Alternatively, some residential parks may move away completely from offering secure homes with the security of tenure guaranteed by the 2013 Act and towards a rented home model. Assured shorthold tenancies offer only limited security and their use would alter the character of park communities, depriving others of the many advantages afforded by a close community on a settled residential park.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

57. There is no evidence that the payment of commission affects the ability to sell a park home. Private sales of park homes have been subject to commission payments for over 50 years during which time the frequency of sales has followed trends in the wider housing market.

58. The 2013 Act introduced a transparent procedure under which the obligation to pay commission is highlighted. This means that the buyer can factor it in to negotiations.

59. The *only* effect which the commission has on the sale procedure is to reduce the amount received by the seller. There are three reasons why this is fair, reasonable and in the interests of homeowners:

- First, it is important to recognise that when homeowners buy a park home they make a deal which includes the payment of commission when they or their estate/family sell it. This is a fair deal because it makes the original purchase price and the pitch fee more affordable by deferring some of the park owner's income until a park home is sold. However, the deal becomes unfair if the homeowner can change its terms and avoid or reduce the final payment.
- Second, it is essential to underline the downsides for the buyer and for all other homeowners on the park if commission is reduced or abolished. The buyer will be paying the same price and is no better off. However, both the buyer and *all* other homeowners who are not selling will suffer from the reduction in maintenance and services which we have described in return for a higher pitch fee.
- Third, although only some 5% of park homes are sold each year, in about a third of these cases the sale will *not* be by the homeowner, but by their estate. Members tell us that many homeowners expect their park home to be their final home and prefer the thought that commission will be paid after they have gone rather than making increased payments from their own limited income. (65% of homeowners responding to PACEC indicated they did not intend to move from the park in their lifetime.)

60. In short, the change which is proposed would benefit just 3% of homeowners in each year as they sold their home. More than 95% would be disadvantaged.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

61. Glass's Caravan Guide provides park home values based on the assumption that homes are bought and sold off site. Valuations are provided going back 20 model years. Analysis of the values confirms how a park home without a pitch depreciates rapidly, by more than 50% by the time it reaches 15 years old and by some 75% at 20 years.

62. Conversely, a well-maintained park home on a park will appreciate for many years, closely following the local housing market.

63. So, for example, this 2001 32x20 Tingdene Hayden Classic is being marketed on a park in Powys for £57,950. Glass's Guide values the home at £11,075, therefore the pitch and park are providing £46,875, i.e. 80% of the value.

2 Bedrooms, Sunny Haven Park, Powys, Wales
Sunny Haven Park, Wales (ref: 5650)

£57,950



64. Similarly, this 1998 40x20 Stately Albion Windsor is being sold on a park in Glamorgan for £95,000. Glass's Guide values the home off-site at £10,125, therefore the pitch and park are providing £84,875, i.e. 89% of the value.

2 Bedrooms, Green Hedges Park, Wales
Green Hedges Park (ref: 5452)

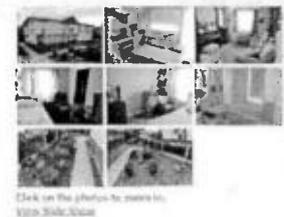
£95,000



65. Or, this 2003 36x20 Tingdene Milton Cottage is being sold on a park in Flintshire for £82,000. Glass's Guide values the home off-site at £18,600, therefore the pitch and park are providing £63,400, i.e. 77% of the value^{vi}.

2 Bedrooms, Willow Park, Flintshire
Willow Park, Wales (ref: 5106)

£82,000



66. These examples underline the value of the park's location. The home with the lowest off-site valuation is being marketed at the highest price on a park in Glamorgan.

67. Given the rate of depreciation of the home itself, these examples also demonstrate how the percentage of the value provided by the park increases over time. For a very old home which would incur disposal costs for its removal, the pitch and park provide 100% of the value when sold with rights under the Mobile Homes Act 1983 (as amended).

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

68. An unintended but welcome effect of the change in the 2013 Act requiring the buyer to pay the commission is that it gives the buyer and the park owner a natural opportunity to be in touch with one another. This is essential in establishing the new relationship between homeowner and park owner.

69. The commission is clearly stated in a contract into which homeowners have entered freely and with full information. Despite the lobby suggesting the contrary, 77% of consumer respondents to the PACEC survey confirmed they had been made aware. Only 16% said they had not (a surprising result given the consumer lobby which suggests that they had not reviewed the Written Statement provided to them). Even of that very low percentage, no doubt a number had simply forgotten with the passage of time.

70. If by lobbying Welsh Government consumers can retrospectively change the terms of their contracts with Welsh businesses, an unfortunate precedent would be set. The unfairness may have a wider economic significance for Wales. Interest groups would be encouraged to lobby for legal changes to contractual payments. Which contracts and which Welsh businesses would be next?

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

71. BH&HPA is unable to provide park accounts, therefore we employed surveyors to undertake Planned Preventative Maintenance Surveys^{vii} of a sample of parks to forecast their future costs. In this way, we provide evidence to Welsh Government of the costs that will need to be funded by the income to a residential park.

72. From these, we commissioned GVA Commercial Property Agents to model future scenarios, considering the size of park, values achieved from home sales and level of pitch fee income. GVA's report is appended as further evidence.

Micro-businesses (up to 15 pitches)

73. The analysis shows that micro businesses with up to 15 pitches are already making insufficient return on the capital employed, even with the commission set at 10%. Therefore, those with finance will be struggling to meet the payments on their loans and are already making difficult decisions regarding park maintenance. Unless purchased outright with cash, park businesses will have borrowings to finance either their acquisition or the 40% inheritance tax paid when the business passes between generations.

74. Further, those businesses charging pitch fees in the lower range are shown to be making an operating loss already, despite commission receipts set at today's 10%. Such losses are unsustainable as already highlighted by the PACEC report.

Small businesses (15 - 50-pitch residential parks)

75. GVA undertook similar analysis for a 50-pitch residential park, which is the largest size within the small business category. This showed the return on capital to be lower than would be required to meet finance obligations for parks with pitch fees at the lower end of the range. When changes to the rate of commission are factored into the model, these parks would make an operating loss if commission were removed.

76. This modelling underlines the differing economics of residential park business in Wales, dictated by size, pitch fee level and values achieved for home sales. It shows how any reduction in the commission rate would send smaller businesses to the wall, whilst the scant or absent return for some larger park businesses would mean responsible investors would look elsewhere. This is not a model for *'the long-term viability of the park home sector in Wales'*^{viii}.

77. We would welcome the opportunity to meet with Welsh Government to explain this evidence further.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Pitch fee review

78. We have already discussed the significant effect of the change from RPI to CPI pitch fee reviews.

79. As responsible businesses, our members are committed to meeting the other new requirements of the 2013 Act but tell us they are concerned that the time and cost incurred exceed the benefit to homeowners.

80. The new pitch fee review form runs to eight pages to which a notice must be appended. The forms are not easy to complete and there have been technical challenges by small numbers of homeowners based on inadvertent errors. These disputes give rise to significant costs which are disproportionate to the sums at issue and do not benefit the quiet majority of homeowners on the park. The costs of producing and sending these forms is significant, and sometimes higher than the funding generated by the review. Pitch fees referencing the negative CPI indices in April, September and October 2015, meant incurring these considerable administration costs in order to reduce income to the business.

81. The logic of the change from the RPI to the CPI index was *'that pensions are linked to CPI, and most mobile home owners are pensioners'* (para 193). However, the triple lock was introduced in 2010 such that pension incomes have increased by at least 2.5% each year. Pitch fee income to a residential park in Wales reviewed with reference to April's CPI, would have seen pitch fees reduce by -0.1% in 2015, then increase by 0.3% in 2016, so a change of 0.2%. Or to average the CPI indices, this was 0.04% in 2015 and 0.68% in 2016^{viii}. Therefore, whilst pension income rose by more than five percent (5.06%) in those two years, pitch fee income increased on average by less than one per cent (0.72%). We have already explained why costs rising ahead of income is not sustainable.

Site rules

82. The site rules consultation procedure enabled park owners to consult homeowners about the park rules they wanted and many worked from model rules we provided, adapting them to the circumstances of the park to encourage community cohesion and reduce any uncertainty or ambiguity. However, the process is complicated and many parks have had to absorb the costs of legal advice in the region of some £1,750-£2,000 for each park.

83. The objective was that park rules would be published by councils so that they would be available to all, in the public domain, and to home buyers in particular. However, Welsh councils have failed in their duty to publish these rules on their website. For example, whilst Gwynedd charge £25 for rules to be deposited with them^{ix}, nowhere are rules published on the council's website.

84. Our review of Welsh councils' websites^x, indicates that only five of the 22 councils with residential parks in their area have published park rules online. As such, up to 77% are failing in their *duty* under s16 of the Mobile Homes (Site Rules) (Wales) Regulations 2014 that a *'local authority must (a) establish and keep up-to-date a register of site rules in respect of protected sites in its area; and (b) publish the up-to-date register online'*^{xi}. We are certain that eight councils (36%) are failing in this duty given BH&HPA members' reports of rules deposited and yet no register on the council website. (Credit for compliance goes to Newport City Council, Pembrokeshire County Council, Powys County Council, Rhondda Cynon Taff County Borough Council, and Swansea City and County Council.)

Private sales procedure

85. Welsh Government hopes that agents and solicitors would provide specialist support in the private sales process have largely not been met and most transactions still take place with the seller or buyer (or both) acting without legal advice. Some homeowners find the process difficult to follow and this can cause uncertainty when paperwork is not completed correctly. It also means that buyers are purchasing without the benefit of advice or survey, creating problems for the future. As a consumer-to-consumer transaction, there are no statutory protections against misrepresentation such and the principle of buyer beware can be insufficient to protect the vulnerable.
86. Overall the residential park home sales market continues to track local housing markets closely. Notwithstanding the challenges in the process which we have described, there is no evidence that the new sales procedures have caused an increase in the number of park home sales or an adjustment in their price beyond adjustments in local markets generally.

Fit and proper

87. Welsh councils have issued 96 licences to 'fit and proper' persons to date and none revoked^{iv}. As already indicated, some businesses holding these licences are controlled by people who have been barred from BH&HPA membership. Some of our members question why a procedure which was intended to prevent unfit operators has presented no bar to the unscrupulous. A more proactive approach to enforcement would benefit all homeowners and reputable park owners.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

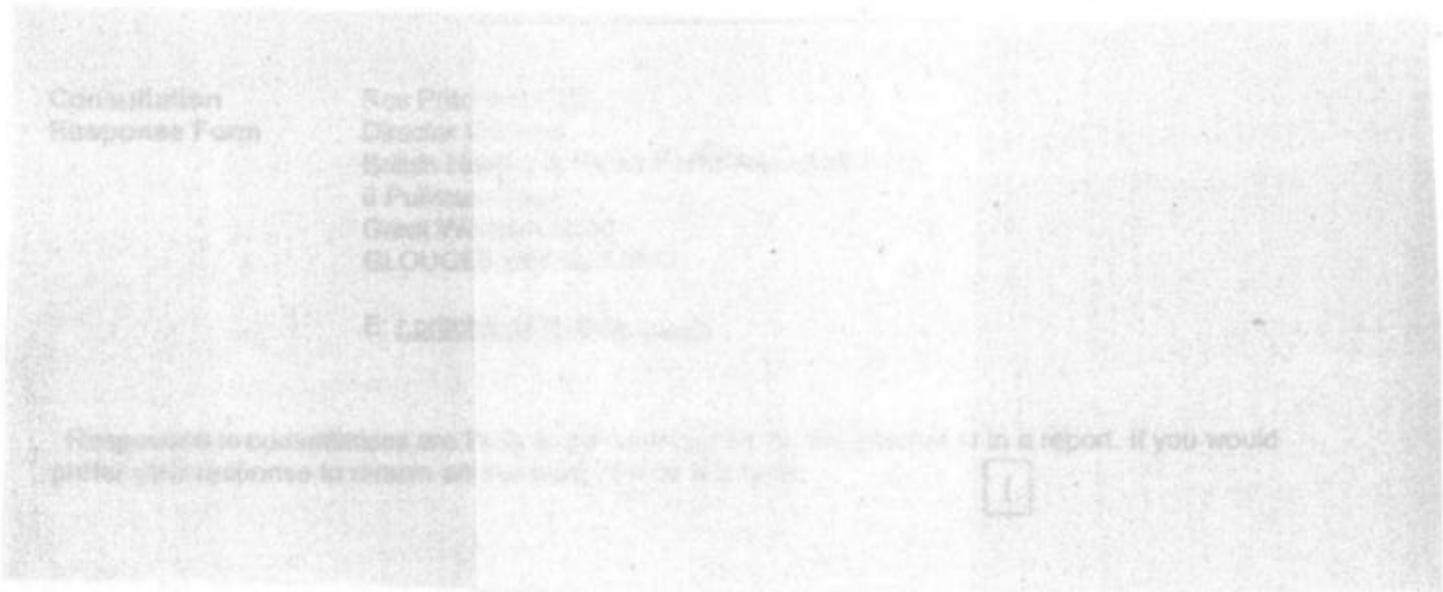
88. We have noted the huge problems that would follow a considerable, sudden exit of bona fide business people from the sector. That is inevitable if the commission rate is changed. One of the consequences would be an increase in parks operated by the so-called rogues, i.e. BH&HPA members who speak Welsh would sell their park/s to others who do not.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

89. We suggest Welsh Government should not create a regulatory regime where only the so-called rogues - who do not speak Welsh - can prosper in Wales's park home sector.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

90. We hope our responses above and independent research forecasting the impact of change have communicated the depth of our concern at the proposal to abolish or reduce the commission. We trust that Welsh Government will consider the steps necessary to ensure *'the long-term viability of the park home sector in Wales'*ⁱⁱⁱ.



Park Homes Commission Rate

1. Consultation questions

1. Are you:						Response Percent	Response Total
1	A park owner					6.32%	11
2	A representative body for park owners					0.00%	0
3	A park home resident (owner)					83.33%	145
4	A park home resident (tenant)					5.75%	10
5	A representative body for park home residents					1.15%	2
6	Other (please specify in box below)					3.45%	6
7	No answer					0.00%	0
Analysis						answered	174
	Mean:	3.06	Std. Deviation:	0.81	Satisfaction Rate:	34.29	
	Variance:	0.66	Std. Error:	0.06			skipped
							1
Other: (13)							
1		A prospective tenant					
2		Holiday park home owner but not residential.					
3		I am a park owner residents who with my husband [REDACTED] as owned our PH in [REDACTED] West Wales for [REDACTED] years					
4		My Husband and I have lived on this park for [REDACTED] years and when we moved here the park was owned by private individual. In [REDACTED] the park was purchased by the largest park owning company in Great Britain and many changes ensued, not always for the better. The parks can be bought and sold just like a second hand car and also our homes are regarded by the powers that be as "chattels" not permanent homes which is insulting to say the least.					
5		i am a park home owner, but not the land owner, land is owned by the park owner.					
6		i am a park home owner, but not the land owner, land is owned by the park owner.					
7		I am a park owner at [REDACTED] Park [REDACTED]. I object to having to pay commission fees to any Park owner, who does nothing to earn this commission fee mainly because he or she did not offer any reduction in the price of my Park Home when I bought it and therefore should not expect any second commission (which was taken at the sale of our homes) when they have not contributed. I pay ground rent and that is what the park business is run on. Many of the park owners pay a different ground rent at the will of the park owner. We are at the beck and call of these dictators without recourse except to our Government who we need to defend us, so please revoke this unjust demand of Park owners who have no right to demand a second commission on the older generation. The Magna Carta was signed to defend the the poorer people against the rich. We do not ask for what is not ours only for what we have saved for. NO SECOND COMMISSION FOR ANY PARK OWNER WHEN WE SELL!					
8		I am a park home resident who with my husband [REDACTED] have owned our PH in mid wales near [REDACTED] for the last [REDACTED] years					

1. Are you:

			Response Percent	Response Total
9		Test		
10		I am the son of a Park Home resident (owner) that resident being [REDACTED] yeras of age and asking me to fill in this form for him.		
11		We are Park Home residents and have owned PH in both [REDACTED] and now [REDACTED] for 5 years		
12		i am a park home owner and live with my husband [REDACTED] has owned our PH in [REDACTED] for 9 yearsThis		
13		<p>Park owners ([REDACTED] business partners, with [REDACTED] assisting in day to day management.)</p> <p>[REDACTED] We've been owners and operators of our residential park since [REDACTED]. [REDACTED] and we'd hoped for it to remain under family ownership – but have decided to defer decisions about the long term future of our business, until WG plans become clear. We're currently anxious that changes to the commission rate will render the business unsustainable in the long term, and will damage the good working relationship that we currently enjoy with our residents – and have worked hard to foster over several decades.</p> <p>Own and operate the one park and live adjacent to it. Full residential licence for up to [REDACTED] homes (but would not be able to accommodate anywhere near this number (licence originated in the early 1960's, when homes were 8ft wide. [REDACTED])</p> <p>[REDACTED]</p> <p>Currently accommodate [REDACTED] homes ([REDACTED] single, [REDACTED] twin) upon the park. Mixture of [REDACTED] static caravans and [REDACTED] residential park homes.</p> <p>We've been steadily upgrading the park, so that whenever a static caravan has been removed, it's been replaced by a residential park home. This has been very gradual and we've never asked existing residents to 'upgrade' their older homes or remove them when they reach a certain age (the oldest home on the park is over [REDACTED] years old, and has never been subject to a re-sale.) In most instances residents have either died, or decided to leave the park of their own accord. All homes on the park are owned by their occupants – who pay a weekly pitch fee [REDACTED]. Residents are a mixture of ages, and include families, working people, and retired couples. [REDACTED]</p> <p>[REDACTED]</p>		

2. Should commission on the re-sale of park homes in Wales:

			Response Percent	Response Total	
1	Be retained at the current 10% level		2.87%	5	
2	Be reduced		14.94%	26	
3	Be abolished		77.01%	134	
4	Other, (please specify in box below)		5.17%	9	
5	No answer		0.00%	0	
Analysis					
Mean:	2.84	Std. Deviation:	0.54	Satisfaction Rate:	46.12
			answered	174	

2. Should commission on the re-sale of park homes in Wales:

				Response Percent	Response Total
Variance: 0.29 Std. Error: 0.04				skipped	1
Please explain the reason for your answer: (152)					
1		<p>There are no costs involved for site owners when a resident sells their park home, and I am at a loss to understand what this charge is intended to cover. It appears to have been based on the historical charges made by holiday caravan site owners when holiday caravans are sold privately, and this may be justified as holiday caravans do tend to change hands frequently, but park homes are usually occupied by a more mature population, who, as in the case of my husband and myself, chose to move for health reasons and hopefully will not move on. However, if circumstances in the future meant we had to sell our park home, the loss of 10% of the revenue would almost certainly mean we would not be able to purchase another property. This, in effect, forms another tax on our home.</p>			
2		<p>Park Home owners receive approximately 200% profit on initial sale of a new Park Home and subsequently collect ground rent each year, the majority of which is profit as not much spent on maintenance. Any commission on sales would also be a profit.</p>			
3		<p>It is unfair, as park owners get pitch fees and that is sufficient compensation for use of their parks. The 10% is a barrier, and will certainly make us consider whether this is a market we really want to enter, since the park owner will be able to demand a huge windfall if we sell.</p>			
4		<p>No other property transaction carries such a penalty when selling, the site owners statement that they will go out of business is nonsense, audited accounts will show this unpredictable source of income is simply a very lucrative bonus which unscrupulous owners exploit by forcing out disenchanted residents. Solution, Base the sales commission on the difference between the purchase price and the selling price, the site owner will still be receiving a substantial unearned income on sales.</p>			
5		<p>This iniquitous charge was originally set at 25% and applied when site owners were in complete control of buying and selling of Park Homes, which were at the beginning(50yrs ago) static caravans and these did not have a great deal of value. Since the 1960's these have been replaced by modern Park Homes worth significantly more.£ 180000 and above on many sites. The rate has been reduced since then to a 10% maximum. However there is no negotiation on this rate it is take it or leave it. The Mobile Homes act(Wales) 2013 removed the site owners from the private sales of Park Homes. This means that when a resident sells their home not only do they pay a commission to the selling agent they also have to pay 10% of the sale price to the site owner which is totally unfair. Under the present regulations the purchaser has to pay this on top of the agreed purchase price. This undoubtedly hinders the sale and or restricts the asking price. As the site owner can no longer claim this 10% is for their time and expenditure in assisting in the sale of the home this charge has now become obsolete.</p>			
6		<p>People who buy park homes are usually retired or about to retire, the commission to be paid is taken off the sale of the home and therefore reduces the value of the amount gained from the sale</p>			
7		<p>I need the money to help me move to sheltered housing accommodation, am suffering from the onset of both Parkinson's and Alzheimer's, don't want charity or handouts, have always been an independent person, will fund my own care not be a burden on the state, all my life savings are in my home, why should anyone steal 10% from its value to fund their own luxurious life style, put an end to this exploitation of old people.</p>			
8		<p>£2000 per house would be a reasonable amount as each unit is already paying pitch fees on a monthly basis and this would continue when the new owners take up residence.</p>			

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
9			
	There is absolutely no justification for this commission. It is literally money for nothing, as site owners do not have to do anything to get it. They have already made up to 100 per cent profit selling the home to the original purchaser, plus ongoing pitch fees.		
10			
	They can no longer claim this 10% commission for there assistance with selling your home as this no longer applies		
11			
	there is no other answer. Commission charges go back over 50 years, it was introduced by park owners without any challenges because there was no-one to challenge them. times have changed from caravans to park homes from £10.000 to £250.000. The charge has gone under many names for whatever reason but it has always meant the same, money for nothing. It has been reduced over the years but now is the time to be bold and say enough is enough and abolish it		
12			
	This charge has long been a very large bone of contention. Many years back it was 25% and the homes were definitely at the lower end of the housing supply and the parks were mainly owned by private or familial owners. The market has changed considerably since then and now is a very large money making business with a large number of very big companies owning parks, the homes are now much more luxurious and command huge prices some in the region of £250.00 down to £20.000-£30.000 for a second hand home. The commission rate has since been reduced and since 1983 has been set at "up to" 10% but nearly all park owners charge the maximum 10%. The charge has been called many things in it's time e.g. Exit fee, deferred pitch fee, transfer fee and until the "Mobile Homes (Wales) act the park owners could say that because they had to play a part in that sale they were entitled to that fee, since the act they no longer have any part in the sale therefore the park owner gets 10% of your equity for nothing.		
13			
	there is no other answer. Commission charges go back over 50 years, it was introduced by park owners without any challenges because there was no-one to challenge them. times have changed from caravans to park homes from £10.000 to £250.000. The charge has gone under many names for whatever reason but it has always meant the same, money for nothing. It has been reduced over the years but now is the time to be bold and say enough is enough and abolish it		
14			
	i bought my home at a considerable price using all my money from the sale of my previous property and therefore i see no reason why i should not receive its full value on resale.		
15			
	They earn a good living out of the ground rent charged		
16			
	We already pay monthly ground rent, I honestly don't think Park owners should take commission on home sales, I would be interested to know why they do though.I		
17			
	There is absolutely no justification for this commission. It is literally money for nothing, as site owners do not have to do anything to get it. They have already made up to 100 per cent profit selling the home to the original purchaser, plus ongoing pitch fees.		
18			
	if not abolished park home owners should not be able to charge any more than any high street estate agents fees.		
19			
	I feel that it is an unnecessary charge by the Park Owners. We already pay pitch fees and community taxes. Having paid pitch fees we are also restricted to what we can do on our pitches, so many rules and regulations to abide by, especially by some Park Owners who seem to delight in making residents miserable and stressed by their sometimes ridiculous rules. Also bear in mind that when one makes a sale there would be other costs to consider for the sale to go through, such as estate agent fees and solicitor fees which reduces the cost of the sale, so why therefore should the Park Owner make more money from the backs of residents when most residents are of retirement age.		
20			
	You should not have to pay any commission on the sale of your home to anyone who has not done anything to help with the sale of your home this is daylight robbery.		
21			
	When a Park Home is sold by the owner/occupier the site owner's income continues		

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
	<p>You are paying the ground rent to the site owner throughout the year for the site upkeep, which does not happen on all sites and unfortunately we are living on one this sites in wales.</p> <p>And because of the state of this site we are on, my NEW parkhome has depreciated and so, if I sell my Park home we would not even be able to sell it for the price we paid for it.</p> <p>So I believe that this 10% commission should be abolished.</p>		
32			Park homes lose money, so when we sell, we need all we can get
33			I think it is too high at the moment but feel if it is abolished then site owners would be highly likely to increase site fees. This would have an immediate and financially punishing effect on most people and would likely cause more financial hardship especially if you are a younger person paying the fees
34			This charge is extortionate 10% is a huge chunk to lose on the sale of a home to park owners that really do nothing to earn it.
35			ground rent is more than adequate to cover the lack of facilities on this park
36			<p>The 10% of the value of the property is out of all proportion ie.£10'000 for a park home worth £100,000.</p> <p>I would like to suggest that a small lump to cover any admin costs of say,£500 per sale of a park home would be a fair way forward.</p> <p>My last point is that the park home site owner plays no part in the sale at all so the £500 lump sum is quite a generous one.</p>
37			<p>My reason for it to be abolished is this. There are [REDACTED] park homes on this site of which [REDACTED] are occupied, all of these pay an average of £[REDACTED] per month. I was under the impression that this was partly for the upkeep of the park and for wages and owners profit. I have never understood why we have to pay 10% when we sell and I believe that this amount is up to the site owners discretion as to the percentage we have to pay. Our site owner insists on the full amount as do the majority of others, this is pure greed.</p>
38			The owner does nothing to sell the home if anything if they drop into office for directions he wold say look at our show homes so he makes it harder for owner to sell
39			<p>On our park at present we have [REDACTED] homes for sale the amount being [REDACTED] therefore the commission the Park Owner will receive will be [REDACTED]. We all have to pay estate agents fees on top to which we all moan about but they do at least advertise for you, put up for sale boards and if wanted show people around. Estate agents fees are around 2 percent and over the years they have been pulled up about charging that amount. Therefore how can Park owners justify the amount they receive for doing absolutely nothing it is day light robbery. I do believe people do not understand how much Park Homes sell for they are NOT CARAVANS.</p> <p>This has to be STOPPED. The loss of this revenue to the Park Owner does not give him the right to boost up our rents.</p>
40			We pay a monthly ground rent which also covers maintenance and should not be charged when we sell.Any prospective buyer could be charged a nominal site fee.
41			<p>The park home site owner receives a monthly ground rent fee which increases year on year. The purchase of our park home was entirely funded by us so we see the 10% commission on re-sale as unfair and unjustified. This level of fee does not apply to other types of homes/houses and the park home site owner does not re-invest monies received into the park itself.</p> <p>Regrettably, currently you are obliged to sign a contract to this effect otherwise you cannot purchase your own home on such a site. It's immoral.</p>
42			<p>Park owners already make a substantial profit from selling a new home to a resident.</p> <p>Park owners receive a more than adequate annual pitch fee for the upkeep of the Park</p>

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
43			
44			
45			
46			
47			
48			
49			
50			
51			
52			
53			
54			

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
55			
56			
57			
58			
59			
60			
61			
62			
63			
64			
65			
66			

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
67			
68			
69			
70			
71			
72			
73			
74			
75			
76			
77			

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
	homes. This would leave us with very limited opportunities if we needed to move. In addition we purchase the services gas, electric and water from the Park Owner administration charges go onto these bills (in our case we feel the admin. charges are fair but other Park Owners might charge unfair rates for this).		
78	With so much going into the pocket of our Park Owner he should spend more on the residents surrounding areas and Safety and be approachable as he promised to be when he was selling his properties. The 10% is not earned in any way shape or form it just makes it almost impossible to sell a property and it has been known that potential buyers have been drawn away from purchase interest by the owner trying to sell a new property instead or a potential sale being taken up to a resale property. In other words the Residents feel trapped by the Park Owner.		
79	The park owner already benefits from the monthly pitch fee. I don't think they should be allowed to collect commission whenever a property is sold.		
80	I believe that the existing commission rate paid to a site owner when a home is sold is totally unreasonable, For the following reasons. 1- The park owner makes a very considerable profit when a new park home is sold on site even after the costs relating to the siting of a new home are taken into consideration. 2- The site owner also charges a considerable rent amount for the plot which the home stands on. 3- The site owner also make a profit on the utilities lpg gas, electricity and water. Why on earth should a site owner also make money if you decide to sell your home it is a totally unfair Situation, most park home owners are elderly and vanrable on a fixed income how feel trapped in there home as they can't afford this outrageous 10% commission.		
81	We pay enough ground rent so why should he get more from the sale of the house there's little maintenance done on the site		
82	As park homes like other properties increase in value why on earth should sellers, have to pay 10% of the value of their home when completing a sales agreement. Park owners make enough money for themselves via sales of new homes, as they have a monopoly with the manufacturers and charge extortionate rates for new homes to be sited. They also charge a pitch fee per month and have exclusive rights regarding electricity supply, vehicle garaging and parking charges and in many cases do not look after the parks for the residents. Park owners have become extremely rich over many years on the back of buying and selling, which in many cases is the reason for purchasing such parks in the first place, so I say enough is enough. More people in retirement would move to the park home living environment if the 10% levy on sales was abolished, meaning that more family suited homes would be available for the younger generation, relieving the housing problems we have at present. More so I believe that park home living should be removed from unscrupulous park owners, so older more vulnerable people could be protected and be able to live their last years, in peace and security and with no pressure so have local authorities take over the parks totally.		
83	My father can see no need for a commission rate on the sale of Park Homes, does not see it as necessary to either party and believes it is immoral as it is totally unearned income at the expense of the seller.		
84	Park owners will only allow homes on site ,that have been bought through them. Huge mark-up !. Why should they then have another huge profit (10% of an average home sale is £15000) on your main asset. Also note that in the main Park homes do not accrue in value like bricks and mortar, and are more likely to fall in value.		
85	I know 2 park home owners, 1 that is my park home owner and another who owns another site locally. Both are financial predators [REDACTED] [REDACTED]. As the majority of residents of park homes are frail elderly, many completely alone in the last chapter of their lives will go on to either a		

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
86			
87			
88			
89			
90			
91			
92			
93			
94			
95			
96			
97			

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
	stands is owned by the park owner and the resident pays a rent plus council tax. For this reason, I feel that any profit made on the sale of the property (i.e. park home) belongs solely to the resident who owns it. In the bad old days of sale blocking, a resident I know was forced to pay commission at 'business' rates because the resident had been bequeathed the property in a will.		
98	<p>Since the last consultation on Park Homes my service charges etc have increased - probably to cover the costs of the owners licence- and I have received NO benefit from the increase.</p> <p>Despite to increased costs I am charged, nothing has changed and I feel the last consultation only led to rules that are even more Draconian, giving more power to the site owner and less say to the residents.</p> <p>I own my home, and I see no reason why a site owner should get a penny from property I OWN, they do not pay a penny towards the upkeep of my property, all maintenance costs are at my expense, they do not contribute to the now mandatory insurance I must have, their rules state that I must keep my property maintained to a good standard, which I agree with, but it seems that when I go to sell my property I have put in all the money to make the home worth what it is worth, and the site owner gets 10% for doing nothing but charging me more for services that have not changed.</p> <p>The site owner already receives thousands just for siting a new home, when my home was first sited here they charged the previous owner of my park home the equivalent of around £6,000 to £8,000 just to put the home on its plot and connect the services, why they should also profit from the sale when they have contributed NOTHING to the maintenance of the home?</p> <p>People living in Park Homes today are mugs, I tell anyone thinking of buying one to seek alternative housing arrangements; we are powerless, as an example, the site has strict rules on [REDACTED], but these rules do not seem to apply to the site owner [REDACTED]</p>		
99	This iniquitous charge dates back to the 1960's.It was originally set at 25% and mainly applied to the sale of older static caravans. During the following 50yrs static caravans were replaced by modern park homes which are worth significantly more money, £180,000+ on many sites.The Mobile Homes Act 2013 removed Site Owners from the private sales of Park Homes meaning they can no longer claim this 10% commission for their so called "assistance" with a residents private sale , it is now obsolete!		
100	I think now the park owners don't get involved in resale of pre owned homes and the home owner incurs the costs of an estate agent the park owners fee should be reduced to 5%		
101	We purchased the business, on the basis of the income which included commission on sales, we borrowed against this to purchase the business accordingly. Every home owner is aware before they purchase on site that when they sell they will be liable to pay the commission.		
102	I think this is an outdated law that has been difficult to deal with previously and therefore has not been addressed before. We already pay the park rental each month which is able to be increased every year. [REDACTED]. I then had to pay the park a fee for no work that they had carried out. I am concerned that when / if I now sell my home they will again receive commission and not provide any help with the sale. Therefore what do they receive the commission for? If a home is empty but not sold the park still receives the rental income for the pitch.,		
103	The unit/home on the site is owned by the resident for which a rent is payable to the site owner for the land. As the home owner pays for any selling fees to enable a sale,possibly incurring estate agent fees,it seems rather unjustifiable that a commission can be charged by a site owner for doing precisely nothing.		

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
104			
	you don't have to pay commission when you sell a house so why a park home?		
105			
	If a bricks and mortar property is bought leasehold, you don't have to pay 10 percent to the leaseholder on the sale of the property. Why should it be any different for leasehold park homes?		
106			
	We believe a maximum of 5% should be paid on arrival on the site into a transparent fund for the park improvements. Please note that the monthly ground fee already covers standard maintenance.		
107			
	As it is unfair that we pay a yearly rent and still have to pay 10% when we sell our property. On our site all we get from the site owner is the grass cut. We have to get our own bins emptied etc.		
108			
	We feel it is unfair that we pay a ground rent and still have to pay commission when we sell out property		
109			
	My understanding of the current 10% "commission" is that this is payable to the park owner by the seller, it is payable on the sales value of the property which would include any improvements made to the property and the pitch made by the home owner, it could also include fixtures and fittings that could be included as part of the sale which were not in the original purchase. This 10% effectively penalises homeowners who develop and look after the property.		
110			
	we think we pay enough for are home from the park home owners and as we gift are home to are family why should we give them part of are inheritance		
111			
	It is unreasonable. 2% as maximum stamp duty would be a fair amount.		
112			
	I already pay a monthly site fee for any work required on the park site which is also paid by every resident each month. I can see no reason for the 10% charge.		
113			
	If i want to sell my home i may require the services of an estate agent to make the sale ,there charges are likely to be around 2% so why do i have to pay another excessive amount of 10% for no service whatsoever to the site owner.ther is no justification for there charges.years ago the price of a mobile home was cheaper therefor the commission charged was smaller ,even though it all seems relevent because it is based on percentages,because the price of accomodation has risen so high in relation to living standards the comparason of commission is not now relevent ,where estate agents are more realistic an example for my home ,is the possible value is around £[REDACTED] which would give the site owner £[REDACTED] for nothing how can that be called fair, in addition i would have to pay 2% =£[REDACTED] to the estate agent who has done the selling.for this reason i feel strongly against the existing 10% charge.		
114			
	nothing done on the park to justify the money		
115			
	This is a relic of the past and an unjustifiable penalty on the mainly elderly park home owners. This must be the only business in the world in which people are handsomely paid for doing absolutely nothing!		
116			
	Site owners maintain that the 10% resale of park homes is needed for the continuation of their business, this is utter rubbish!!!, their business runs on the amount of money or profit that they generate on a daily, monthly or yearly basis, this amount is cover be it correct or not on the monthly pitch fee that is charged to the tenant not a hypothetical figure. Example!! if a site owner installed 10 new homes on a residential park the business would make a profit as soon as the homes are sold (what they paid the manufacture and their selling price), they would start charging ground rent/site fee`s the instant they are sold....if the buyers of these 10 homes NEVER sold for 20 years how would the park owner survive that 20 years if they have no income from the 10% resale, would any "Bank" or "Banks" keep propping up a business for money that they may receive in 20 years time!!!!, it is unbelievable that they use this ploy to try and generate more money. I believe that all businesses should make a profit and have a vision for increasing their profit but this is such a lame excuse used by park owners. In		

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
117			
118			
119			
120			
121			
122			
123			
124			
125			
126			
127			
128			
129			

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
130	<p>The park owner does nothing and charges 10%. this should not continue.</p> <p>When we purchased our park home we was fully aware of the commission, as is every body in the same position, and perfectly happy with it. Of greater importance is that if the commission is abolished our site will probably close, we will become homeless with another ■ sets of residents, we will loose a substantial amount of money and the council will have to find us suitable accommodation.</p>		
131	<p>The site owners only job now is to look after the site. We had NO choice when we bought our new home, it was 10% or no home, why should they get it, on future sales of our property. NA We now have to use an estate agency to sell our home, IE.. 10% plus agency fees etc. at the present moment. We have spent a lot of money on both the home and the outside land, why should they get 10% of my improvements.</p>		
132	<p>i cannot think of any reason or any precedent where the imposition of commission to a person who has done nothing to assist in the sale of a park home is justified.I do not pay Renault if I sell my car.or Swift if I sell my touring caravan.A close relative has recently sold a flat ■,leasehold,for a sum in excess of 300000 and is not liable for commission to the ground leaseholding landlord of circa 30000 ! Who or how did this clause did into the 1984 act??</p>		
133	<p>The owner makes a lot of money when he sells a new home like a builder plus he has the pitch fee each year. They shouldn't make again when you sell as he doesn't sell it you have to pay an estate agent like every one else</p>		
134	<p>Park owners make approx 50% profit on each initial sale this can be between £40K to £70K ■, in other parts of the country this can rise to £90K, from this he has to lay out the Park installing bases, services, roads, lighting which I estimate from talking with various people in the Park Home business to be about ■ per unit, this leaves about £■ profit per unit, on a site like this that can amount to £■. On top of this we each have to pay a ground rent of £■ per unit (this increases to £■ approx this year) this totals ■ a year. when you consider the vast amount made on the first selling of a unit plus the ground rent, why should a further 10% be taken from a owner if they were to sell, as this is an unknown amount and also an unknown quantity which cannot be planned in any persons business plan(a unit could sell 1,2,3,4,or more times) this is solely a profit making exercise to line a Park Home site owner pocket. There is no known reason why this 10% is levied or planned as its an unknown factor</p>		
135	<p>c. Be abolished.</p> <p>The commission charge is merely a perk devised by park owners for park owners when residential park home occupation evolved from holiday caravan businesses in the last century, when the Caravan Sites and Control of Development Act 1960 – Residential Caravan Sites, was adapted to become the Mobile Home Act 1975, to define the opportunity to live permanently in a 'mobile' residence. The difference between a brickbuilt or wooden house erected on a solid foundation and a park home is the fact that the park home is built of wood and stands on a wheeled chassis, which is merely a hereditary design defect carried over from the original idea of a holiday caravan that could be towed by a vehicle. A park home would never be capable of being towed by a vehicle because of its size and weight, and is therefore wrongly categorised in law as a 'chattel'.</p> <p>The other ill-considered part of the transition was to leave the various incarnations of the Mobile Home Act enshrined in civil law, which allows unscrupulous park owners the opportunity to indulge in a wide variety of criminal activities without fear of police involvement. In this situation the park owner is effectively the landlord (as with a block of flats, for example), and should have equivalent responsibilities.</p> <p>Despite strenuous efforts to convince lawmakers that, in essence, park home dwelling is long term continuous occupation of a home in the same way that a resident will occupy a structure on a solid foundation, park home occupiers continue to be treated as second class citizens. The finest example of this is the refusal of the police to respond to offences on a park home site because the land on which the homes are situated is the property of the site owner, and therefore private land, despite the fact that park home residents are required to pay council tax which includes the police</p>		

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
136			
137			
138			
139			
140			
141			
142			

precept. The police may respond to an incident outside the park, [REDACTED], had the [REDACTED] occurred ten metres further west, the police would have waved us away with a self-satisfied smile and the comment "private land, civil matter...."

The pitch fee, which is inflation proof, must have been calculated by the site owner, to cover the cost of maintaining the park, and to give a reasonable return on their investment. Profit would have been made on the sale of the park homes when they were originally sited. Subsequent improvements to the site which benefit the home owners, and agreed by them, would be recovered from the home owners. Most home owners will have made improvements to their home, increasing the value of the home, adding to the commission when the property is sold.

I knew when I bought my home there was a 10 percent commission, however I am now concerned that this sets up a vested interest in some site owners wanting a high turnover of sales. If they achieve this, they get commission every time, or may purchase an old home cheaply and site a new one for a large profit. That is part of business, but in this instance it can attract the wrong sort of people to want to run park sites, and we are talking about the lives of people who are often more vulnerable.

I think this is an unfair charge especially as I don't think park owners do very much to justify getting 10%. I already pay pitch fees monthly and think this is sufficient for them.

The Park homes lose their value faster than a new car!
I think 5% would be acceptable but I suspect the owner would then increase other charges (ground rent, etc) to reclaim some of his loss.

I regard the 10% commission charged on the sale/re-sale of a park home as being totally unjustified in the present day. To my knowledge, no leasehold or freehold property attracts such a commission on its sale. The only people you have to pay is the estate agent and the government, in the form of stamp duty. If 10% commission on the sale of such properties was charged by land owners and landlords, the UK's housing market would decline even further as young people would find it ever more difficult to get on the property ladder. The same remit applies to park homes, most of which are owned by people aged 50 or more who have a vital need to hang on to every penny they have to avoid becoming an unnecessary burden on local authorities and social services. I am [REDACTED] and down-sized three years ago to a brand new park home costing [REDACTED]. What concerned me was that I was unable to order and purchase the park home direct from its manufacturer. Instead, I was told that I had to pay the park site owner who then took from me [REDACTED] by way of commission. If I have to pay another 10% to the park owner when and if I decide to move, then I could have handed over in excess of £[REDACTED] . . . for what? I already pay a pitch fee of more than [REDACTED] a year for the privilege of "parking" my property on his land. Where will it end? Please reduce a charge which is causing distress to an increasing number of elderly people who feel trapped in their homes, unable to move because of the large sum of money that has to be handed over to an owner of a park site that they are trying to leave. What benefit does the leaver derive from the payment of such commission? None whatsoever apart from being poorer and more limited in their future accommodation options.

why should park owners receive a commission from the sale of a new home, then again for the resale of the very same home... this does not happen with bricks and mortar

my park home was bought new from the site owner paying full price, this park was sold on to the next owner, with 10% paid to the site owner and then sold on to me again site owner was paid 10%. that is the site owner getting total price for the park home in the beginning plus two lots of 10% of the value of the park home. At this point in time if I were to sell again I would be required to pay yet another 10%. This park home was paid for in full at the beginning of purchase, how many times should you have to pay for the same park home to the original seller who on top of this charge, charges in excess of £100 each month for the ground it is sited on. Having to be over 50 yrs old to live here, many residents are well into their pensionable years hence the possibility over several sales in the park homes life span

2. Should commission on the re-sale of park homes in Wales:

		Response Percent	Response Total
143	If I sold a house I do not have to give anyone a % of it so why should I have to give a % of my caravan which is my home. Caravan sites need more regulation - they seem to be able to put fees up as they seem fit and owners have no choice to comply. They even charge meter rentals on smart meters! [REDACTED], you cannot even sell your caravan on privately without the owners agreeing the price (I suppose to protect their %). In addition, if say for example, I sell mine now [REDACTED], I don't get a reimbursement of fees plus they charge the new owners full site fees again (in fact they increase them by [REDACTED]). It all seems heavily loaded in favour of the parks. Buying a static is such a massive investment but you end up losing so much as a consequence of park owner tactics		
144	We pay over the retail price for on site caravans and then when we want to leave and arrange to sell either to a private buyer or the site they charge us 15%of the selling price it is daylight robbery and the worst is site owners have you over a barrel because if you don't sell you have to continue paying site fees		
145	I can only assume this rule was originally introduced by the landowners and incorporated into legislation without opposition. It has been subsequently altered but not independently. The Berkeley Hanover report was represented by an employee of Berkeley Parks. Park Owners now play no part in the selling process so there is no reason for an unearned charge. As with the impositions placed on leasehold properties, the time for change is now.		
146	It should be abolished provided that will not result in ground rent increases, which would affect all tenants rather than just those thinking of selling.		
147	Park home owners are usually old people and it is grossly unfair that they should have to pay commission		
148	Commission on the re-sale of park homes in Wales should be retained at the current 10% level. Our reasons are set out in our subsequent answers		
149	tenants already pay£100+ per month rent on this site alone approx [REDACTED] homes		
150	The owner of my park is already receiving weekly rent from me, so it seems excessive to also get a large sum from a sale. Particularly when the park owner is not involved in the sale other than having to sign a form. 10 % of a sale just for that seems unfair on the buyer. If the park were involved in the sale process, then the cost of acting as an 'estate agent' should be paid by the seller not the buyer, and it should be capped at a certain amount. I think if the commison is retained going forward, it should be capped anyway. No more than 5% of a sale or capped at something reasonable like £1,500.		
151	The owner plays no part in the transaction of the sale/purchase. Apart from giving consent to the new occupant.		
152	The park owners contribute nothing to any increasing value of individual homes. Home owners are fully responsible for improvements and maintenance of their own homes and it is totally unfair for park owners to benefit from any increase in value resulting from any work completed by individual home owners.		

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	135

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

		Response Percent	Response Total
1			
	The park owner makes a large proportion of his income from the initial sale (our park home is [REDACTED], retails at around £80,000, and we purchased it for £[REDACTED]!) I appreciate he had to develop the site and site the park home, but an almost 100% profit, plus the monthly site fee levied on each property, should make for a very profitable business. To then levy a 10% surcharge on each home sold (and each time they are sold) seems to me to be unacceptable. The site I live on has [REDACTED] park homes. In the [REDACTED] years I have lived here [REDACTED] homes have been re- sold ([REDACTED] in the last year) making a healthy additional profit for the site owner.		
2			
	Not known - potential tenant.		
3			
	How long is a ball of string?, make site owners show audited accounts for the previous five years to give a balanced viewpoint on sales income.		
4			
	It is impossible for any site owner to predict this income. It relies on the death of the resident or their move to a care home in almost every case. It is impossible to make any accurate forecast on the likely sale of Park Homes on their site. The PA report clearly states how long PH residents have lived/intend to live in their Park Home so how can the site owners depend on this income source. No sensible business person can ever depend on the 10% commission being a reliable source of income. It is impossible to base their business plan on using such an unreliable figure.		
5			
	As a site resident we feel nothing is given back that can be seen on site is repairs, site maintenance, the pitch fees we pay monthly should account for this		
6			
	They will have very clever accountants to manipulate turnover figures.		
7			
	Don't know		
8			
	Won't know. Not told by the park owner		
9			
	Depends on how many home owners die or move away! Commission income can also be manipulated by sales to very elderly people, giving site owners odds-on opportunities to generate excellent returns in a short term. Recent sales of new homes on this site have been to a [REDACTED] year old and several people in their [REDACTED]s, with the most expensive home costing [REDACTED]		
10			
	Its impossible to forecast how park homes will be sold privately but on this site very few have been sold so how can he depended on this as part of his income		
11			
	A park owners cannot forecast the sale of second hand homes, there is not a single park owner who could include commission charges in their financial forecasts or future investments. It is an unknown therefore an unearned bonus.		
12			
	This is a totally unknown quantity and a park owner would need a crystal ball to forecast how many second hand homes on each park will be sold. It has been said that park owners base their assumptions on previous years figures but according to the PACEC Report many residents have lived or intend to live for long periods in their homes so how can this be forecast.		
13			
	A park owners cannot forecast the sale of second hand homes, there is not a single park owner who could include commission charges in their financial forecasts or future investments. It is an unknown therefore an unearned bonus.		
14			
	we have only been here for [REDACTED] years and a number have been sold second hand which have shown very little spent on the site itself in the time we have been here if any.		
15			
	None as we pay site fee's,for the upkeep of the site.		
16			
	Depends on how many home owners die or move away!		

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

		Response Percent	Response Total
17	do not have access to owners accounts to verify this question.having been on my particular site for [REDACTED] years		
18	I cannot answer this question.		
19	Do not know.		
20	Only a site owner can answer this question.		
21	if you mean how much does the site owner put back into the home owners sites he does nothing after you purchase your home. he has a site manager, he is just interested in collecting your ground rent, after that you are on your own, with restrictions as what you can and can't do on your home site.		
22	If only 5 properties are sold on the site in a year, that would bring in a commission income of £25,000, and that's probably under-estimating each property's selling price at £50,000 x 10%. This income would be in addition to the income generated by the monthly service charge, which I would conservatively estimate at £140,000 per annum. I have lived here for nearly [REDACTED] years, and I am confident that only a small proportion of that income has been re-invested in the site, and the owner has several other sites as I understand it.		
23	N/A		
24	none on this park		
25	It depends on how often homes are sold on the site. On this park 3 homes have been sold in the last 5 months.		
26	It depends on how often homes are sold on the site. On this park 3 homes have been sold in the last 5 months.		
27	if you mean how much does the site owner put back into the home owners sites he does nothing after you purchase your home. he has a site manager, he is just interested in collecting your ground rent, after that you are on your own, with restrictions as what you can and can't do on your home site.		
28	N A		
29	Because they won't allow a site representative body here on this site, we have no idea where the money goes.		
30	Not known		
31	Don't know		
32	It is impossible to predict how much income you could make from this income. No sensible business man would ever depend on the 10% commission as being a reliable portion of their overall income.		
33	amount depends on sales		
34	Not known.		

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

		Response Percent	Response Total
35			The money is not put back into the site
36			Cannot give evidence as we are not aloud to see any documentation regarding anything on the park . All utilities should be displayed as put in place by the Welsh Assembly. Park Rules are only displayed.
37			Not aware of any.
38			Have seen no evidence to suggest it does
39			Not known.
40			very little as there is hardly any movement on a settled site
41			i can't answer this one
42			None!
43			I have no idea, but, I do appreciate that the commission represents a value on income to the park owner, by how much, can only be established if the park owners are willing to be open and honest in this consultation with their declaration of income received by the commission.
44			Answer as above - obviously dependant on the site and the services of individual sites that are provided
45			Unsure have not seen any upgrade to our park. or any business accounts to supply evidence
46			don` t know
47			We don't see any improvement on our Park. The commission earned by the park owner is not put back into the upkeep of the park. Again I refer you to the enclosed photographs
48			This cannot be determined, as nobody knows when they are going to move, or it has to be said, die (and if this is the case rent still has to be paid even when empty,so no money lost there).
49			nothing we have seen homes sold on our park no improvements have been made, we still have poor lighting uneven roads, meters read when the owners feel like it.
50			N/A
51			I don't have this information
52			I have no evidence that any commission relates to the upkeep of the site where I live and thought the monthly ground rent covered the costs of general upkeep.
53			it is not possible to forecast how many park homes will be sold on any park home site in any one month
54			Not known
55			As the site is purely Park Homes and a small site with no communal facilities then no other maintenance is required - it is kept immaculately - I have no complaint at all

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

		Response Percent	Response Total
			The only other thing is that the Owner reads the Water (6 monthly) and Electric Meters (Monthly) Gas is ordered directly by the Residents
56			I have no idea as I have not seen any profit and loss accounts of this Park Owner and this charge in my opinion has no bearing on the issue except to effect a small loss of his profits.
57			I would say about 60%
58			N/A
59			N/A
60			As residents of a park home site we do not receive any information from the site owner as to where any income generated in this way goes.
61			All income received goes into the owners pocket. None of this will be seen again by the park residents
62			I have no idea.
63			I have no idea.
64			None
65			its just a way of them getting more money out of us
66			It would appear that the income already received from pitch fees (or ground rent) is sufficient to maintain the Park as there are many years when there are no Park Home sales.
67			Unsure our site is very well maintained but I would have thought the site fees would cover these costs.
68			This would depend on how many properties were sold during the course of the year.
69			In our situation if our home was sold for £150,000 The site owner would be entitled to £15,000 for doing absolutely nothing hence why people are trapped and cannot afford to move.
70			Very little
71			In my past experience as a park home owner in one single year after the resale of homes, the park owner in question received over £150,000 in commission, when other income from pitch fees was £72,000 so indeed a substantial amount of money was earned.
72			no evidence
73			I do not believe any of the money taken as a commission is reinvested in the site as a whole. I have seen no improvements while I have been in residence and believe that the pitch fee that I pay of ██████ per annum more than compensates for the landlord's loss due to not being able to use the land for other purposes. I understood on taking out the agreement that the pitch fee was for communal upkeep of the site but it is all hard landscaped with poorly tended roadways and no ramped pavements.
74			Average pitch rental is around £█████ per month =£█████ x number of homes on park

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

		Response Percent	Response Total
90			Not known.
91			Not sure
92			No idea.
93			<p>We have been on this site for █ years and the only significant contribution has been replacement of the water supply and the addition of street lighting which has yet to be completed.</p> <p>When the new water supply was ready for connection we were told unless we paid £█.00 connection fee, the old supply would be switched off next day and we would have to make our own arrangements for connection. The Park Owner would have to approve of who we used and there would be a charge for one of his employees to oversee the work. Meanwhile we would have no water supply so we had no choice but to pay the owner.</p> <p>The right to drinking water should be a basic part of the infrastructure of the park. Afterwards we found that not all residents had paid the fee.</p> <p>There have been several new expensive homes sold on this site in the last █ years with several used homes being sold on at the 10% commission, we can only assume that the money has been used on other sites owned by the park owner.</p>
94			don't know
95			<p>The site on which we reside, when completed, will consist of █ homes, there are still █ vacant plots.</p> <p>The current typical ground rent of £█ / month will produce £█pa for the park owner, this is also supplemented to a degree with a 5% admin cost on electricity, water / sewage charges and a £5/month payable on the LPG account.</p>
96			they are not putting nothing back into the park
97			None that I know of.
98			My mother also owned a mobile home █. When she died in █ 10% was paid from the sale and I would say from sale and deceased residents an average of at least █ out of █ per year is sold and provides an income.
99			the commission the site owner receives is not invested back into the site for the benefit of the residence, the site owner also charges thousands of pounds when a new property is brought onto site which i can understand for some of it used to install the home on its plot also the transport of the home from the supplier, even then the amount taken is far more than is used ,
100			don't know
101			Don't know how this can be quantified: it is impossible to know how many homes might be sold in a year.
102			Not known, site owners privileged information.
103			I have no knowledge of this
104			That depends upon the rate of turnover of people selling. The capital received therefrom enables a site owner to do park development and improvements, to the advantage of its residents.
105			N/A

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

		Response Percent	Response Total
106			A difficult one to answer on my site. There has been a definite improvement on the park in way of grass cutting and tree felling etc.It is difficult to relate that to the owners or the pride in the park by the managers on site.
107			Probably nothing.The monthly site fee is surely sufficient
108			Not known.
109			Not known.
110			N/A
111			I have no idea as the site owner has not disclosed this to me.
112			sorry do not have that information
113			Not privy to this information.
114			As a resident I have no idea, but considering this is a site for over fifty year olds I should think there is a fairly steady turnover.
115			As far as I can tell it is around 10% of annual income.
116			No idea we're residents.
117			NA
118			Obviously, none, as in years where no park homes are sold the site operates successfully on site rents alone
119			As far as I can see it merely provides the site owner with more profit to be enjoyed by himself
120			Can't see much our owner is making extra pitches which he covers when he sells New home otherwise he keeps site tidy but owners keep there own pitches up to date. The site fees well and truly cover this
121			As stated above as its not known when or how many times a unit is sold, it cannot be used in any persons BUSINESS PLAN,
122			This is impossible to assess. Modern park home design and construction is becoming increasingly opulent, and therefore increasingly expensive to purchase and maintain, commensurate with developments in the 'conventional' housing market. The purchase price of a new park home can be anything up to a recently publicised, astounding figure of £500,000 on a park in Kent. The resale of the most expensive homes could therefore generate anything up to £40,000+ commission charge, and a more modest one with a resale price of £52,000, for example, £5,200 commission. This income is generated at random intervals, see answer to Question 4.
123			The income from the site fee this year will be around £54,000, income from the 10% commission on properties which will be sold could be about £30,000. Another property has been purchased by the site owner, and will be replaced by new, to be sold at a profit.
124			I don't think this is entirely relevant. It is more important to protect people who are

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

		Response Percent	Response Total
125			
126			
127			
128			
129			
130			
131			
132			
133			
134			
135			
		answered	135
		skipped	40

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	139
1		As above. I know of a number of owners on my site who would like to sell for various reasons (moving nearer to family as they get older, unable to afford to increasing monthly site fee, etc) but are unable to due to the selling price they need to achieve. I am sure this is replicated across the country due to the ages of most residents on residential park home sites.	
2		Not known - potential tenant.	
3		On our park open for ■■■■ years we have had ■■■■ sales, the site owner has incorporated the unearned income into his business by purchasing a brand new top of the range ■■■■ !!!	
4		This is impossible to forecast. On our Park there has only been ■■■■ sale in the past ■■■■ years that was not due to death or moving into residential care. Again refer to the PACEC REPORT.	
5		No idea	
6		Getting less and less, we can't afford to move,	
7		I believe that many pre-owned park homes (non-residential) are sold back to the park owner for a ridiculous price, a lot lower than the actual market value. If a park home (non-residential) is sold privately the park owner has to vet the buyer and takes 20% commission of the sale.	
8		Impossible to say exactly, but very few on this park in the past ■■■■ years as most purchasers intend to live in their home until they die. However, the park is currently undergoing massive redevelopment and extremely expensive homes are being brought in. The deal is that the site owner will buy your home, you buy a park home from him, and hopefully your house is of a higher value so you will be left with a nice cash nest egg. For the site owner, this could mean a good profit on the sale of your house plus 100 per cent profit on the new park home you are buying from him.	
9		its impossible to forecast as stated in question three	
10		It is impossible to forecast.	
11		Again, this is impossible to forecast, sometimes residents may have to sell because they need to go into care, or a bereavement or any change in circumstance. If the park is well run and is a happy park there could be many years between sales. One park I know of has not sold a private home for over 7 years so how could that park owner count commission charges as a forecastable income. On the other hand if a park owner or park manager makes life difficult on a park there may be a large turnover of homes in which case he /she will make plenty of money on the backs of unhappy residents.	
12		It is impossible to forecast.	
13		In the ■■■■ years we have been here at least ■■■■ have been sold but we have never seen a business plan to give any evidence of its use.	
14		You have to be over 50 to live on park so some home are sold s few times in resent years	
15		Not sure.	
16		On this site quite a number of homes are sold there is a high turnover	
17		Impossible to say, but very few on this park in the last 20 years as most purchasers intend to live in their homes until death. Do not understand how unknown commission	

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
			income could be incorporated into any business plan.
18			██████████ on my site for ten and a half years, ██████████ there has been ██████████ houses sold out of the ██████████ in total, and some of them have been sold twice.
19			Park homes on this particular site are frequently up for sale.
20			On our park the sale of property is very small, maybe 1 or 2 a year.
21			Only a site owner can answer this question.
22			no evidence at all , and there are homes for sale on a regular basis, we have lived here for ██████ years, and there have always been homes up for sale, homes are not easy to sell on.
23			See above. I imagine the commission on sales is very much part of the business plan, given the pressure that is put on owners by the site owners when a sale is planned!
24			N/A
25			hardly any on this park I think █ has been sold in the last █ years one of which is still in dispute for work to be carried out
26			This would depend on the circumstances and age of the residents on the park
27			no evidence at all , and there are homes for sale on a regular basis, we have lived here for ██████ years, and there have always been homes up for sale, homes are not easy to sell on.
28			N A
29			Because of the state of this site █ homes have been sold this year and another █ homes are up for sale, this is ongoing.
30			Not known
31			Don't know
32			Again impossible to predict.
33			varies on sales
34			I HAVE SEEN A FEW HOMES WHICH WERE PRE-OWNED SOLD ON IN THE SHORT TIME I HAVE LIVED ON THIS PARK.
35			Not known.
36			Every time a second hand home is sold
37			This should be answered by the Park Owner
38			N/a

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
39			Unclear
40			At least five park homes have been sold within the last year [REDACTED].
41			To my knowledge there are two/three vans for sale and in [REDACTED] about three vans have been sold
42			i dont think its possible to calculate this as there is no knowing how long occupants will stay in a home before it being sold and it all depends on circumstances
43			1) Every time the park home is sold. 2) Park homes have been sold on this site quite often. Very little has been done at this site except [REDACTED] and lighting which is of little consequence being far too low to be of use.
44			My own experience on this particular site is that in the [REDACTED] years I have been resident....on a [REDACTED] property site. [REDACTED] properties have been sold ([REDACTED]) ranging in price from £60,000 to £100,000, [REDACTED], not a bad return in my opinion.
45			Unsure as no evidence
46			I would say that an average of [REDACTED] homes a month is sold on this site with the average sale price being around [REDACTED]. However some of the homes sold recently have been brought onto the park by the site owner so he has made more than 10 per cent on those sales.
47			don` t know
48			There have only been [REDACTED] properties sold in the last [REDACTED] years. However there are currently [REDACTED] properties up for sale at the present time, and a further [REDACTED] properties to go on the market soon, due to bereavement of owners. The prices of these properties currently for sale range from [REDACTED] up to [REDACTED]. This will generate a very healthy commision for the site owner, which will not improve our environment at all.
49			I would imagine not very often, most residents stay until they depart this earth. Mobile home living is normally your last purchase of a home.
50			every time a second hand home is sold privately income has never gone back into the park
51			N/A
52			Several used homes on the park have changed hands over the [REDACTED] years we have lived here. All of them at a huge loss to the original residents who also had to pay this abominable commission to people who just don't care about our poor surroundings.
53			I have no evidence of income incorporation details relating to the park where I live. I am aware that pre-owned park homes on this site location are offered for sale on a frequent basis.
54			although a few park homes have been sold on our park recently they where sold without the park owners help yet he still expected the 10% commission
55			Not known
56			I have only owned mine for [REDACTED] month but there is another 1 up for sale and a new 1 which will be up for sale shortly - so that 10% will go to the Site Owner also

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
			I think it should be reduced to about 2 or 3%
57			On this Park at a guess I would say approx. █ homes were sold last year but this is guess work.
58			In the █ years I've lived here there have been 7 homes sold.
59			In spite of the increase in life expectancy the average on this small park (█ homes) is █ per year.
60			N/A
61			Pre-owned homes are rarely sold (the usual home takes on average two years to be sold)as usually the current owners resent having to hand over a (what is to them)large proportion of their money and future financial security. Plus there is the issue that having sold their park home at a specific price (minus 10%)they cannot afford to purchase another home elsewhere at the same price as they will have to payout another 10% to the new site owner. Thus effectively 20% of their money is "lost" to them.
62			The Park Home can be sold another 2,3,4 or more times
63			This varies considerably due to the nature of the park. Pre-owned homes are usually sold when the resident dies, but some residents do not stay on a park longer than 2 years. It can take some considerable time after that for the home to sell or it could sell quickly. However, ground rent is still payable until that happens
64			I have no idea.
65			On our site there has been █ homes sold in the last █ years. No income was incorporated into the business plan.
66			As stated above, this can vary as some years there are no sales at all.
67			TEST
68			We have lived in our home for █ months in this time █ new homes █ have been bought and █ second hand homes have been sold or are for sale.
69			Approx 4-5 park homes have been sold during the last year. I assume the income is ploughed back into the business to provide essential maintenance of the site.
70			We are new to the park home site which has █ park homes sited on it, the park is relativley new about █ years I believe it has taken that long to fill the site as it was █ I believe about █ homes have changed hands.
71			Don't know ask owner
72			Depends upon the park home site in question but on a large park there could be █ resales every year, as people who by default have to be over 55 to live there they tend to be an aging population. Also many people on retirement move to park home sites, as the lifestyle usually is better and equity on their standard home is available. The business plan for most park homes is merely to put money into the bank accounts of the park owners, not to improve the parks or the environment around the residents. Please refer to IPAS a residential support administration who can supply many many details, regarding the structure of the industry, and also the complaints of residents which is many.

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
73		no evidence	
74		In my time on the site I have seen one pitch sold on four different occasions with the landlord taking 10% each time. The outgoing owner pays all estate agents and legal fees and the landlord makes no contribution to the sale whatsoever until it is time to collect his 10%.	
75		Cannot answer	
76		 <p>What is this if not deliberate financial predatory behaviour from a never ending source of vulnerable potential victims? Owning a park home site provides the means to this. There is no need to give them the right to any percentage of homes sold privately.</p>	
77		On this park at least one a year I do not know how it is incorporated into the business plan, to be fair the park is pretty well maintained	
78		There again hard to say exactly . Normally if some one dies or goes into a home	
79		Not known.	
80		Our park is [REDACTED] and will contain approx [REDACTED] homes in the near future, after which only second hand homes will be available for sale. Notwithstanding that new homes are currently available, [REDACTED] second hand homes are sold each year.	
81		Not being a site owner I can only say that most of it comes at the hardest time of life that being at the DEATH. Of the final occupier. By this time the valuation of the property has devalued substantially anyway. Once purchased as new,which usually attracts a sales commission by the site owner,most owners stay in their homes for the rest of their lives as a general rule	

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
82			It is IMPOSSIBLE to forecast how often commission will be received. Residents normally only sell their Park Home when a major change in their circumstances occurs. (PACEC report paras .18 & 6.19)
83			Do not know.
84			On the site we are on turn over of homes is quite often.
85			As above.
86			I'd say that a Park home comes up for sale on average every five or so years, so that would be the amount of commission, I have no idea of how much they are selling for and if you think the site owner would happily show me their business plan you are delusional.
87			It is IMPOSSIBLE to forecast how often commission will be received, as on our park there has been at least ■ private sales in the past ■yrs.
88			it is impossible to forecast how often commission will be received On our park there have been no private sales for the past ■ years I believe this to be the case on most well run parks , as residents normally sell their Park Homes when a major change in their personal circumstances occurs e.g serious illness , infirmity , death of a spouse etc (PACEC report paras 6.18 & 6.19
89			In the four years prior to April 2017, I have received commission on one park home per year.
90			Unknow
91			n/a
92			Not known.
93			Yearly
94			Quite often on my park home estate as there is a regular turnover in sales.
95			There is a reasonably large turnover of used homes sold on this site. Regarding the Park Owners business plan this is something we have never be privy to.
96			don't know
97			Bearing in mind that the park is still not yet fully occupied, since we moved in ■yrs ago, there have been ■ resales, assuming an average sale price of £ ■, this has realised a further £ ■ in income for the park owner. The combination of rent and resale income has averaged ■ for the park owner which has not included any moneys coming from the initial sale and development of new plots.
98			n/a
99			Varies
100			About 3 out of ■ homes sold per year.

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
101			on the evidence that i see there is not a great deal of homes changeing hands maybe some 50% of residence change thier home once .because of the age group of +50 years of age to get onto the site as a resident,but everybody changes once when they die and the site owner then gets his commission.
102			don't know
103			The site owner here is sitting on [REDACTED]. It will be a miracle if all the income from these sales are all declared: site owners are inherently dishonest and the income will probably be spread into other companies they own.
104			Not known, site owners privileged information.
105			I have observed some homes on my site sold three or four times and know for a fact that the full 10% commission has been taken each time just on one unit.
106			Dont/know
107			All depends on the season and not sure how many.
108			This is a small site but probably 5 or 6 have changed hands in the [REDACTED] years or so.
109			4-5 sales per year
110			Not known.
111			During our time at [REDACTED], nearly [REDACTED] years, 7 homes have been resold. We are not privy to the owners business plan and are therefore not aware of how any commission is reinvested or otherwise in to the Park.
112			3/4 times per annum
113			I have no idea how the commission income is included into the business plan as I have never been granted this information.
114			In the last [REDACTED], this is the peiriod that we have lived in [REDACTED], 8 properties have been sold, each property generates 10% to the site owner
115			Not privy to this information.
116			Again, I can't supply evidence, but as very little maintainence is done to the infrastructure of the park, except for clearing and preparing sites for new homes, I should think it's fairly often.
117			About 2 homes per year.
118			No idea, we're residents
119			NA
120			I have not been in residence long enough to compile a yearly average of sales
121			How would I know how it is incorporated into the site owners business plan. As far as I know [REDACTED] homes have been sold over the last [REDACTED] years?

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
122			Some of the gone a have been sold 3 to 4 times a nice free income.
123			Not Known as its a unknown factor
124			<p>Impossible to say. We dispute that the 10% commission is 'tied into the whole economics of park homes', as recently stated.</p> <p>A resident may live in his home on a park for 3 or 30 years, and the commission charge cannot therefore be part of a calculable income for the purpose of inclusion in a business plan. The commission charge is also open to abuse by the park owner, who, after receiving his payment following the sale of a home to an incoming resident, needs only to harass and intimidate the new owner to the extent that he or she simply puts the recently purchased home on the market in order to get away. The park owner then collects another commission; a nice little earner. There was an instance of wrongful demands on this park several years ago, when an elderly lady purchased and moved into a home. In the first week of her occupation the park owner called at the house several times demanding several thousand pounds for 'expenses arising from the sale'. She resisted the demands, but several years later when deteriorating health led her to consider moving on, the park owner expressed to her potential buyer that he was owed a considerable sum by the seller, which he demanded from the buyer before giving 'permission' for the sale to take place. This put the buyer off, and the sale was lost. This took place before the enactment of the Mobile Homes (Wales) Act 2013, which (in theory) prevents the park owner from liaising with the buyer before the sale is completed. A few years later, however, the woman [REDACTED] and once again put her house on the market. It was purchased in fairly short order, and the prospective owners received a letter from the estate agent demanding the commission at the rate of 20%, which they unknowingly paid, to the park owner's private bank account as instructed, not into any business account. [REDACTED]</p>
125			<p>I have lived on this site for nearly [REDACTED] years.. during that time there have been [REDACTED] properties have changed hands. on average 1.5 per year. (not including those currently for sale)</p> <p>As there are peaks and troughs in the sale of homes, commission could not be taken into a business plan.</p>
126			Don't know
127			I have lived here for [REDACTED] years and have seen approximately 13 homes change ownership
128			<p>As most people on this site are well over 60 (some with illnesses) it stands to reason that the park homes will be sold more frequently</p> <p>My home was sold new in [REDACTED], then again in [REDACTED] and I bought it [REDACTED] so that's 3 different owners within 10 years!</p> <p>Knowing how much 10% commission I paid I would estimate the owner has already received between £[REDACTED] !</p>
129			See answer 3 above. There can be no known frequency for park home sales and, therefore, no way that park owners can budget for such income or make it part of a business plan. If they did, they could be very disappointed. Once a park site has reached its maximum capacity and there is no further potential for development, then the income received from commission on a sale or re-sale can only end up in one place. The personal pockets of the owner and his/her family. Is this right or fair?
130			The sale of new and resale homes are very often few and far between but who wants to move onto park that's not maintained.. You would need to go to the site owner to answer this question.
131			Some park homes on our park have changed hands 3 times, if £100.000 that's could be £30.000 when the latest owner sells.

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

		Response Percent	Response Total
132			
	Some parks have a high turnover of homes, others have none. This must make it difficult to create a business plan.		
133			
	For the Site Owner to answer. But On this site... █ houses up for sale now, █ and another will be available soon.		
134			
	Every time a home is resold		
135			
	<p>Important to note that we have no control over when/how often second hand homes are put on the market, how much they are marketed for, or who moves into them. Nor are we able to influence the highs and lows of the property market locally. Clearly, if there are several second hand homes available at one time, there is more competition, and each home is likely to attain less. If the bricks & mortar property prices are high then second hand homes are generally likely to sell for more.</p> <p>However, our calculations show:-</p> <p>Average over three year period (ending June 2017) 8 re-sales / █ homes = 20% over 3 year period (ie. 6.8% of total occupied pitches per year)</p> <p>Average over eight year period (ending June 2017) 18 re-sales / █ homes = 46% over 8 year period (ie. 5.76% of total occupied pitches per year)</p> <p>The way in which we incorporate income from the commissions into our business plan is largely based on the knowledge and experience that we've gleaned since █. There's often a 'feast to famine' situation... a slump in bricks and mortar prices often means that people 'stay put,' so there may be no re-sales for some time. Our park has evolved over 50+ years. We try to stay on top of continuing renovation and upgrading of infrastructure (such as underground electricity cables and sewerage pipes, drainage, road surfaces, bridge maintenance.) Whilst we obviously deal with pressing matters as and when they arise, we do try to carry out more expensive jobs – such as road improvements, sewerage and drainage upgrades, etc. when cashflow is boosted by commissions.</p> <p>Historic improvements we've previously been able to fund through commissions include additional paths, street lighting and fire points, and upgrading of lengthy unsealed track to concrete surface.</p> <p>A less obvious way we've incorporated the commission rate into our business plan is by enabling us to move away from having a rental fleet of static caravans. Experience showed us that having rental residents living alongside owner occupier residents caused greater dissatisfaction and disagreement between residents (typically, the rental residents were more transient, took less pride in their homes and gardens, and made less effort to build good relationships with their neighbours.) However, this model does rely greatly upon our ability to generate income from re-sales via commission.</p>		
136			
	not known		
137			
	To my knowledge, at my park, there are around 2 or 3 sales per year. No idea how the income is incorporated as the park owners are very closed-mouthed about money matters.		
138			
	Park homes are often sold when elderly people more on to other accommodation. How would we know how the income is incorporated into the business plan?		
139			
	I have no specific evidence but I would think that there are approximately 2 or 3 homes for sale at any given time.		
		answered	139

4. On average, how often is commission income received by a park owner (i.e. how often are pre-owned park homes sold)? How is the income incorporated into the business plan? Please provide any evidence you have to support this.

	Response Percent	Response Total
	skipped	36

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

	Response Percent	Response Total
1	100.00%	135
1		There is no evidence on this site that the monies received are used for the benefit of the site. The owner does not live locally and in the [REDACTED] years he has owned the site has visited only [REDACTED] times. The site is very nice, mainly due to the residents who all have beautiful gardens, keep their homes, fences, etc. regularly painted and in general take pride in their environment. The only work which has been done on the site in the [REDACTED] years we have lived here has been the installation of surface water drainage (which should have been incorporated into the road when the site was developed) and the replacement of [REDACTED] [REDACTED] but it was made clear that the residents would have to pay!
2		Not known - potential tenant.
3		There of course will be decent hard working site owners, still running, in the main, family businesses, who will incorporate commission into improving park conditions, whilst earning a reasonable return on their investment, unfortunately, most small sites in Wales are becoming easy pickings for ruthless large operators, with massive profit the only objective. Mansions, Luxury cars, Helicopters all the trappings of the multi millionaire elite.
4		I cannot comment on this.
5		N/a
6		A fair and decent park owner will improve the site, the unscrupulous will continue to flaunt their wealth, Bigger mansions, helicopters, a collection of Ferraris, all of course with personalised number plates costing £500,000, tune into Million Pound Motors on channel 5.
7		To be fair, some of the commission earned here has been used to upgrade the site, with previous dirt roads being tarmaced and edged. And although pitch boundary hedges were ripped out by the site owner and I lost some of my pitch and privacy as a result, he provided new replacement fencing free of charge. He has also done this on other vacant pitches, making them smaller in some cases. The rest of the commissions appear to have been spent on luxury vehicles and acquiring other park home sites.
8		Sorry no idea , if no houses are sold then he will not have any commission , so how can the 10% be a viable to his income
9		unknown
10		We will never know!
11		unknown
12		We do not know.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

		Response Percent	Response Total
13			You have two week window to pay park owner commission but he is on the phone if not paid same day
14			Not sure.
15			In his back pocket nothing much is done on site he does as little as possible
16			This site is being massively redeveloped, so commission income is almost entirely from the sale of new homes which cost up to £200,000. Presumably some of this income has been spent on upgrading the site, with previous dirt tracks Tarmaced and edged. Many pitch boundary hedges have been torn out, but new fencing has replaced these and residents being made responsible for their maintenance.
17			Not sure how they use the income for site if at all.
18			Only a site owner can answer this question.
19			no idea we know nothing; ??????. a closed shop.
20			I imagine it is used as profit! My experience is that it is very difficult to get any improvements to the site, the absolute minimum is done. For example, when it has snowed in the time I have been here we are effectively site-bound, and when it brought this to the owners' attention I was told effectively "tough luck", that it was not their responsibility to make it possible for residents to move about safely in those conditions.
21			On my park no commission has ever been paid as no homes have been sold, however the previous park owner did reduce the commission payment to 5% as a goodwill gesture.
22			buying racehorses ██████████
23			When homes are sold on this site we do not see any of the commission spent on any improvements or even maintainence.
24			When homes are sold on this site we do not see any of the commission spent on any improvements or even maintainence.
25			no idea we know nothing; ??????. a closed shop.
26			N A
27			Because there is no site representative allowed we do not know but they can buy new cars
28			Not known
29			Don't know
30			After recently watching CH4's "How Do You Get So Rich" and previously CH5's "Million Pound Motors", plus reading numerous articles in national newspapers, I became aware that some site owners lead very extravagant lifestyles. I imagine that this commission goes to fuel that lifetyle. Not all park owners are in this category but many are.
31			UNKNOWN
32			Not known

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

		Response Percent	Response Total
33			Unknown
34			I cannot give paper evidence but look around the site itself and it will be apparent that the roads the trees are clearly not maintained.
35			Don't know.
36			Not known
37			Not known. However a great deal of work creating pitches for more new homes has been carried out.
38			Not sure as the park owner receives the commission
39			i can't answer this one, but all I know is that on the site I live on every one is complaining about the state of the road, the paths, and the fact that trees are very tall and have not been lopped, the agreement says trees will be cut every three years, but its been ■ here and they are not done.
40			This is not known to me.
41			In three years to my knowledge, no improvements to the (residential) site have been undertaken, however, there has been considerable work done to enlarge the holiday part of the site including the addition of ■ new static holiday units.
42			I can only comment as above that the rents would not cover existing services
43			None at all that I can see. Took over ■ year to get rid of ■ very old unsightly old homes at ■. Told no money and no one to help just one man. In fact still there after many complaints! ■
44			not told
45			We do not know how the commission is used by the site owner, but we do know where it is not being used: for the improvement of the Park.
46			It should go back into the business.
47			no idea as no improvements have ever been made to the park
48			N/A
49			Up to the new Act, outgoing residents had to pay the commission to the park owner. But since the MHA Wales 2013 the new buyer has to pay it out of what the home costs. The park owner seems to use the commission and the pitch fees to buy ■ ■ He certainly does not maintain the park to any acceptable standard
50			I have no evidence of how the park owners use the commission they derive from the frequent sale of homes on this site.
51			I cannot honestly answer the question but it seems as that nearly all park home site owners are not short of money that then can lead very extravagant lifestyles
52			We are told that it is to improve the park but we have not seen any improvements for years

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

		Response Percent	Response Total
53			I wouldn't know but in my case the estate agent (who also will charge me 2%) takes it and then gives it to the Site Owner - and there is no solicitor involved so I assume I would receive the amount I sell for less the 10% less the 2% - I don't really know!!!
54			I don't know.
55			Certainly not to improve our residential site more is spent on the other part which is caravan camping site.
56			Minor improvements made have been the result of a health and safety inspection and well covered by the pitch fees.
57			I have not seen any evidence of improvements or landscaping by the Park owner, since I have lived here in the past two years.
58			No information is made available to the residents
59			We have no idea. It is certainly not used to help residents.
60			I have no idea.
61			I have no idea.
62			None of the commission received by our park owner is used for the site.
63			TEST
64			Unsure maybe to develop 3 new plots but these will be the last plots on our site, or maybe the cost of developing these plots is passed onto the people purchasing the new homes.
65			Unknown.
66			Park home law now states that commission is paid via the buyer of a resale home this was recently changed it used to be the seller of the home which paid the commission, same difference the seller has to arrange this via his solicitors.
67			Don't know
68			Commission from resales in my opinion is the cream for the park owners, and is not reinvested into the park improvement plan and seen as a bonus to the owners, as I said earlier which is why the parks are purchased in the first place.
69			dont know
70			No visible signs that the money is used to improve the site. The landlord would suggest that he has replaced the water pipework, with no regard to the owners gardens, but this was essential maintenance born out of neglect rather than an improvement.
71			A person buying a park home has to pay the owner, the 10% commision before they can move in
72			██████████ Park, zero maintenance required, zero money spent on park home site since I have lived here which is 3 years.
73			I do not know, but a lot of ground work is being done on the park

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

		Response Percent	Response Total
74			Not sure how to answer this question, all I know site owners are very wealthy people
75			not known
76			not known
77			In my case this money has no direct benefit to my site which can be borne out by the state of the roads, outdated and inefficient sewers, an aging under pressurized water supply, underrated power supply and Despite this more homes continue to come onto the site. The maintenance team have to look after █ sites so what they can do is minimal at any one time. At the time of completing this form we have no such team As they have all left probably symptomatic of managements unwillingness to expend monies other than the barest of essentials
78			I cannot honestly answer this question. Viewing various TV programmes, plus reading numerous articles in national newspapers, I became aware that site owners lead very extravagant lifestyles.
79			Do not know.
80			no commission is being spent on this park. we can only make an assumption that the money is banked or spent elsewhere. these
81			As above.
82			Unable to say, again, I would not dare ask them anything about their business.
83			I cannot answer this question, only to say that our site owner lives a very affluent life on the proceeds of more than one site.
84			i cannot honestly answer this answer this question Based on personal observations , viewing various television programmes most recently being CH4s How do you get so rich and previously CH5s Million Pound Motors , plus reading numerous articles in national newspapers , i became aware that █ a number of site owners , lead very extravagant lifestyles
85			To enhance his own wealth
86			2015, commission was used to re tarmac the park road. 2014 commission was used for new fencing, of the gas tanks and part of the park. Commission and other income is used to maintain and update the park.
87			See above answer. I have been trying to contact the site representative for a number of months and received no response. They are never on site, despite living locally (I understand). When I previously telephoned the site owner one of the managing directors was very abusive and I will not be contacting them on the phone again. It was also a very expensive telephone number that they use! Again what did I pay them commission for?
88			n/a
89			Not known.
90			don't know not told

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

		Response Percent	Response Total
91			No idea.
92			Apart from previously stated above we have no knowledge or evidence of this.
93			don't know
94			Have no evidence to support how these moneys are used, the park itself is not old enough to require major spending on infrastructure, there are no common facilities on the park which require the support of the park owner.
95			n/a
96			Kept by the park owner.
97			No evidence.
98			i do not know
99			don' know
100			To support luxury lifestyles and purchase of top of the range vehicles. [REDACTED] personalised vehicle number plate had cost £ [REDACTED]
101			Not known, site owners privileged information.
102			At the time of selling the full price is paid by the buyer to the home seller who then pays 10% of that to the site owner. That is what happens on my site. On other sites I know the buyer pays the site owner direct and the remaining agreed selling price to the seller.
103			Our park is very well developed and landscaped, giving every tenant wonderful views and the garden areas and facilities they desire.
104			Incorporates all [REDACTED] sites, so we understand
105			Don't know
106			The Park Home Owner does not divulge this infomation
107			Not known.
108			Not known
109			N/A
110			This response is the same as above.
111			This is income only as far as we can see, no real changes have been made to the site

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

		Response Percent	Response Total
112			Not privy to this information.
113			Not seen any evidence of any commission income being used on the park, or its infrastructure.
114			Again, no evidence, but a stroll around ██████████ where sites are being prepared or reinstated but the roads and water/sewerage system are a bit neglected might show it not being ploughed back into park maintenance.
115			No idea, we're residents
116			NA
117			Presumably absorbed into his private income.
118			No idea.
119			Don't see any signs when he purchased a new bin and his put in another electric ssyst he charged us for it
120			It is not evident that any of these monies are used to benefit the Park
121			We cannot be specific on this point. Since moving to this park ██████ years ago, minimal park improvement/maintenance was carried out until an on-site park manager was appointed and commenced his duties at the end of ██████. Prior to that the site roads and car park were 'improved' with a spraying of tar and scattering of gravel, and in order to reduce flooding, a French drain was installed on one park boundary, but finished off with a covering of clay soil instead of substantial shingle, thereby negating its potential effectiveness. Cutting corners in this fashion to save money, simply undermines effective expenditure. During the last year, however, realistic improvements have been implemented by the park manager in certain areas.
122			There have been necessary upgrades to the electrical and sewage infrastructure on this site. The site owners have been able to make significant increases to their property portfolio.
123			Don't know but would very much like to know.
124			On a new site or one with capacity for development, then the commission income should be used to provide the necessary infrastructure for additional park homes. Whether it is or not is down to the site owner. Currently, the person who paid the 10% commission has no say in how, where or for what it is used. That statement is even more true for a person selling a park home to move elsewhere.
125			No Idea again this is a question that should be posed to the sire owner, as previously stated had to get legal cto have sewage works carried out
126			the 10% is payable by the seller of the park home on completion of sale
127			No idea
128			I do not know but the industry as a whole appears to be very lucrative. Recent publications have highlighted multi million £ homes, a personalised new Aston Martin, helicopters etc and one park owner sponsors a cookery programme on tv. In my opinion, these items are more likely to be funded by the high siting fees and profit on the sale of new homes than the erratic nature of "commission" charges. Sight of the accounts would throw light on this.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

		Response Percent	Response Total
129	For the Site Owner to answer.		
130	Have not seen any evidence of a site being improved from the sale of a park home		
131	<p>The commission income, alongside other income is used to fund the business by:-</p> <ul style="list-style-type: none"> • Ensuring staff availability to:- <ul style="list-style-type: none"> o carry out day to day maintenance on park eg. changing bulbs on streetlights, keeping paths swept, pruning, mowing, strimming and weed killing, cleaning and painting signage, fencing, bollards, checking and maintaining fire points, litter picking, removing debris from drainage ditches, removing blockages from sewerage pipes – most often caused by unsuitable items being flushed down toilets. o deal with residents' enquiries and concerns, disputes between neighbours, enforcement of Park Rules and providing further information/guidance re: re-sales per provisions of Mobile Homes (Wales) Act 2013. o ensure compliance with LA, WG (including Pitch Fee Review process) and HSE requirements. <p>Maintenance and administrative work [REDACTED]</p> <ul style="list-style-type: none"> • Repairing and upgrading:- <ul style="list-style-type: none"> o Underground electricity cables and sewerage pipes o Sewerage system o Drainage o Road surfaces o Bridge maintenance o Fire Safety equipment o Street lighting <p>Park located in spacious grounds, rural location, considerable green space/woodland within park curtilage. Long private drive, accessed via small bridge. Commission income assists with meeting increased overheads arising from this location, including:-</p> <ul style="list-style-type: none"> o Considerable mowing & strimming o Tree pruning, lopping and felling o Maintenance of surface on tarmac drive and park roadways o Treatments of invasive species such as Japanese Knotweed [REDACTED] o Street-lighting (which we continue to keep on overnight...LA has switched lights off in town from midnight for several years now.) <p>We also pay for the services of outside contractors for some tasks including mowing & strimming, sewerage pump servicing and maintenance, tree surgeons and knotweed treatments, larger road repairs. All contractors used are local.</p>		
132	not known		
133	No idea how the income is used. Certainly there are no visible signs following a sale of the owners using that money to do anything to the sold property or the site to improve anything. The park owners do not give information to residents.		
134	Again, how would we know that? We assume it goes into his main income.		
135	I have no knowledge of how the commission income is used.		
		answered	135
		skipped	40

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

			Response Percent	Response Total
1	Open-Ended Question		100.00%	129
1		It does not seem to me that park site owners would suffer greatly if the sales commission was discontinued. For the reasons outlined above, park homes do not change hands frequently, and the development of new sites should be funded from the sale of new park homes (as is the case with bricks and mortar homes). I think those sales would be helped if potential residents did not have the dreaded 10% included as a requirement if they decided to sell. I firmly believe that if councils relaxed their planning requirements to allow more park home sites, and if the 10% penalty was removed, more older people would choose to move into a park home, thus releasing houses to help the housing shortage.		
2		I cannot see why a viable site should be less so because owners can no longer expect huge windfalls upon sales they cannot predict and therefore upon which they cannot reply.		
3		When any attempt is made to remove unearned income from the pockets of these poverty stricken individuals, every trick in the book will be rolled out, in the short term taking in washing, long term selling the big issue.		
4		I cannot see that this will have any impact whatsoever that this charge has on the viability of the Park Home sites. Prior to 1983 the commission rate was reduced from 25% to 10% without resulting in any legal increase in site fees. The site owners make a huge profit from siting a new Park home also from the monthly site fees they charge. Once the site is set up and completed maintenance is minimal and the site fees increase in line with inflation annually.		
5		N/a		
6		More new and resale properties available at the correct price, not the asking price plus 10% which happens now, abolishing this sales commission will benefit both site owners and residents.		
7		Increase in private sales.		
8		Site owners would be compelled to operate with proper business planning -- instead of downright greed -- to ensure viability. [REDACTED] they [REDACTED] cannot forecast cash flow based on commissions which are dependent on people dying or moving.		
9		It will make no difference to the Park Owners income as he makes all his profits on the sale of his new homes and also on his pitch fees		
10		How many parks have closed or park owners gone bankrupt since the last reduction? none!		
11		The park home sales of new homes may well increase if the 10% commission charge is abolished, personally I have spoken to prospective purchasers who have been put off buying because of the charge. The difficulty of residents who have to sell their homes for whatever reason may well diminish because the Damocles sword of the 10% has been taken away.		
12		How many parks have closed or park owners gone bankrupt since the last reduction? none!		
13		None at all.		
14		Taking our equity I paid £[REDACTED] when I sold so park owner get more that estate agent and solicitor put together		
15		Not sure.		
16		nothing will change		

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

		Response Percent	Response Total
17	The viability of sites, both in short and long term, should be based on guaranteed income from pitch fees. There is also the potential profits from sales of new units. Any commission income on top of that is a bonus. [REDACTED] they [REDACTED] cannot forecast cash flow based on commissions which are dependent on people buying, dying or moving.		
18	as far as i am aware there would be minimal impact on this site, as any running repairs are expected to be contributed to by the home owners and we have to maintain our own plots.		
19	I cannot see how any change to the commission payment would have much impact on this particular site, as at present all that is done here is one employer doing general maintenance such as cutting grass and reading meters and planting a few flower pots in the summer.		
20	None.		
21	Only a site owner can answer this question.		
22	we have very little to back up any proof ref any commission, it is really his word against yours. you only get the same documentation when you purchase a home as you would get buying a new car.		
23	I believe the claim that it will impact on the viability of sites is not realistic: it is the owners wanting to continue to maximise their profits.		
24	If the commission was abolished and the owner could not supplement their earnings by introducing higher pitch fees I would imagine it would have a detrimental affect.		
25	probably none		
26	If this co mission were abolished it would make the purchase of a park home more attractive and make selling easier.		
27	If this co mission were abolished it would make the purchase of a park home more attractive and make selling easier.		
28	we have very little to back up any proof ref any commission, it is really his word against yours. you only get the same documentation when you purchase a home as you would get buying a new car.		
29	N A		
30	I believe that the yearly income from the ground rent on all the homes on this site is ample. So why should the park owners profit from the tenants all the time.		
31	Not known		
32	Don't know		
33	Park owners if sensible would not rely on this commission as they do regular ground rent and sales of new park homes, and homes they own and rent out.		
34	It hasn't in proved the sight		

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

		Response Percent	Response Total
35			How can evidence be given to this answer???
36			No supporting documentation but imagine it will lead to heavily increased monthly ground rent charges to compensate for the loss of the income, placing a significant cash flow problem for current home owners
37			Could effect the expansion of the Park for new homes.
38			It would have little or no impact as this site is very settled
39			i am not able to answer this as not a site owner but as a home owner i think the pitch fees would be increased
40			I have no document in support of any claim except word of mouth from the people who have had to reduce the price of their homes in order to sell.
41			I do fear that the total abolishment of the commission will result in the reduction of residential park home sites and lead to an increase in the need for more social housing. However i have no evidence for this.
42			As above
43			None on our park.
44			I suppose rents would go up to help cover any lost income. And reduction in income would probably deter unscrupulous people from buying sites, which could only be a good thing. At the moment [REDACTED] own park home sites and from what I know, their aim is not necessarily to make the sites pleasant places to live.
45			none that i know of
46			We pay the site owner Ground Rent of £ [REDACTED] per month. This should go towards maintenance of the Park. The site owner spends none of this money on maintenance. The roads are covered in moss and potholes. [REDACTED] [REDACTED] The area is an absolute eyesore [REDACTED] [REDACTED] [REDACTED]
47			None, I do not think it would be a large amount.
48			none
49			We don,t think it would make any differance, as there has been no expenditure on our park for the last four years.
50			It would definitely help the outgoing resident to move out and finance a better environment in which to live
51			At the rate the current monthly rental for each plot which has a park home on it, it would seem that the viability of this park site would be sound without the commission additional charge for the sale of one's property. The only overheads are the costs of wages, one part-time general administrator and

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

		Response Percent	Response Total
	one handy-man. Each park home owner pays their own electricity charges which are set and agreed by a single provider agreement via the Park Home management. The same system is in place for monthly water charges and again these charges are set by the Park Home management.		
52	it seems they are trying to say that without the 10% commission they cannot keep a park site going		
53	The only possible result would be a slightly decreased profit margin for the Park Owners.		
54	I don't think it will have any impact on our park home site what so ever.		
55	Possible increase to pitch fees above cost of living rates and therefore unreasonable.		
56	Excessive commission costs could put a potential purchaser off buying a Park Home.		
57	Where we live the park home site owner has a large portfolio of sites all over the United Kingdom. The current site rules allow him to charge us via the pitch fee for any improvements made to the site. He also charges us for sewerage disposal, electricity and water at his rates.		
58	If no commission had to be paid on sales of park homes, then more people would be willing to live on sites and sales would be made much easier		
59	It will not make any difference to the site I live on.		
60	As the park owner receives rent from all the residents all year and does not use the commission for the site there should be no impact on the site.		
61	We cannot see that the change to the payment will have any detrimental effect on the Park due to the fact that the Park runs quite smoothly on just the monthly pitch fees, and many Park Owners currently run several Parks and amass funds from them all. However, not having to pay the commission on the sale of their home, for which the Park Owner does absolutely nothing, would greatly benefit the Resident Owner who already has to sell at a greatly reduced price to that which he has paid the Park Owner and then has to add another 10% loss making the purchase of another property very difficult indeed.		
62	TEST		
63	Unsure Park Owners would need to answer this. My belief is that the current site fees should cover maintenance costs.		
64	It would be easier to sell a property if the potential new owners knew they wouldn't have to pay a commission if they sold it at a later date. Park residents would be more likely to maintain their homes to a high standard and make improvements knowing that any money they have put into their homes won't be swallowed up in commission fees if they decide to sell.		
65	The park home operator would as previously stated would still make a very considerable profit from the sale of a new home, the site rent and the utilities. We are unable to purchase a new park home directly from the manufacturer it has to be bought from the site owner as an example the site owner prepares a base for the new park home and carries out all the other builders works he might spend £15,000 he then has to spend maybe £5000 for transport and siting the home. That's £20,000 consider he buys the new park home for say £70,000 from the manufacturer and then sells to a buyer for £150,000 that's a profit of £60,000 along with monthly site rent and utilities profit. I		

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

		Response Percent	Response Total
66			
	It won't change anything not a lot gets done on site		
67			
	Accountability is the main thing, if commission is to remain then the owners should be made responsible for ploughing this income back into the park for the residents. If the commission is removed totally I suggest that all park home sites will be up for sale, hopefully engaging local authorities to take them over and be managed not for profit, but for the well being of the residents.		
68			
	dont know		
69			
	I can see no potential impact. The level of improvements would remain at zero.		
70			
	In my view it would stimulate sales, as any prospective buyer sees this payment as unacceptable		
71			
	I do not know what impact it will have, it must have some		
72			
	Once we site our homes, there is not a lot more the site owners do , we are responsible for our own utility bills,		
73			
	A reduced rate might be expected to make second hand home sales more attractive. Our park home site owner maintains the site to a high standard, but it is not known how much of the commission is used for this.A reduction in this standard should be guarder against.		
74			
	Not a lot		
75			
	The sale of new Park Homes, the income from Pitch Fees, the (illegal ?) profits from the Recharge of Utilities and that EXTRAORDINARY high income from 10% commission (PACEC FIGURE 5:2 page 37) are cited as the major sources of Site Owners Income. However, in the next paragraph (5.14 page 37) it is stated that a slight disparity emerges. When operators were interviewed. Prior to 1983 the commissionrate was reduced from 25% to 10% without any resulting LEGAL increase in Pitch Fees, and I cannot find any evidence that this caused the failure of numbers of Park Home Sites.		
76			
	I would suggest that the annual ground rent fees paid are sufficient enough income for maintenance and profit		
77			
	these parks are very profitable to the owners. we have no supporting documentation.		
78			
	Again - how would I know?		
79			
	I can't see how it can impact the viability of sites, sites have already put up their service charges after the last biased consultation went in their favour, that should be covering the cost of running the business, our service charge went up and nothing has changed, in fact I'd say things are worse, and the site owners do make a hefty profit when a new home is sited.		
80			
	I have no documentation to support this question.		
81			
	the sale of new Park Homes the income of Pitch Fees the (illegal?) profits from the Recharge of Utilities , and that EXTRAORDINARY high income from 10% commission (PACEC Figure 5 ;2 page 37) , are cited as the major sources of a Site Owners income However in the next paragraph (5.14 page 37) it is stated that a slight disparity emerges . When operator were interviewed they Prior to 1983 the commission rate was reduced from 25% to 10% without any resulting LEGAL increase in pitch fees and i cannot find any evidence that this caused the		

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

		Response Percent	Response Total
	failure of numbers of Park Home sites.		
82	I think it would be wrong to abolish it all together as I am sure park owners would recover there losses in other ways at the detriment of the individual home owners eg increased rent		
83	If the turnover of the park is reduced, large projects like the resurfacing of roads or replacing the lighting, either will not be undertaken or will need to be put through the ground rent. If turnover is reduced I would consider selling the park, for building land.		
84	Unknown		
85	n/a		
86	Not known.		
87	Don't park home owners make enough income from rents? On my park home estate, it is always the full 10 percent paid. Why would the estate owner take less if he doesn't have to.		
88	We are not Park Owners so we can not comment on this. But would like to ask the question - If all the sites on the park were taken and nobody put their homes up for sale for a number of years are the Park owners claiming they would have to close the parks?		
89	don't know		
90	The reduction or abolishment of this commission would obviously have a negative impact upon the viability of the park owners business and for this reason I am not advocating abolishing the commission. I do believe that a reduction to between 3 & 5% would provide a better balance between the needs of both park owners and house owners.		
91	n/a		
92	None as far as I know.		
93	the only evidence i have that none of the commission taken by the park owner is used for he benifet of the site is there is never any improvements made to the site when people leave or die the only time improvements are made is to enable access for a new home to come on site .		
94	don't know		
95	Should not have any effect on site viability, either in long or short term. Site owners have guaranteed rental income, plus any rip-offs they can think of: for example, charging excessive amounts for fencing, etc., and insisting on cash payments for everything to avoid paying VAT. Another large source of income is buying the home of a deceased resident for peanuts and then selling it at a vast profit. In one case in England reported to a House of Commons inquiry committee, a site owner bought four homes for £1 each then sold them on for £68,000 each. OK, business is business but site owners saying their incomes will be destroyed by loss of commission on home sales is nonsense.		
96	If the site owners received no commission they would still run their business on a daily basis as all businesses do, [REDACTED], I never said to my "Bank" I may generate this money in 5/10 years time so can you increase my "Overdraft" please, they would have laughed me out the front door, only		

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

		Response Percent	Response Total
	park owner can supply the information required for this item but, it is my view that if they lost their 10% commission they would try and find a way to increase their fee's		
97	I have no knowledge of the impact of changes to the site owner. I		
98	I suspect any improvement & development by parks will immediately reduce or at worse, cease. The monthly pitch fees are sufficient in my opinion to keep up ongoing maintenance (and an income for the site owner), but inadequate to either motivate or finance anything else. Some things like the resurfacing of tarred roads, replacement of water and gas piping services requires capital.		
99	None		
100	Difficult to estimate for sure.		
101	Sales of Park Homes would probably increase		
102	Not known.		
103	Not known.		
104	N/A		
105	I think the income from annual rents will continue the viability of park home sites.		
106	I cant see that this will impact any changes, any new site pitches that are made by site owners are paid for by the new people purchasing the homes so all cost are redemmed plus any profit that has been set up in the purchase price		
107	Not privy to this information.		
108	The vast bulk of income comes from pitch fees, or ground rent.		
109	Please refer to answer 2		
110	NA		
111	Make it a lot easier to sale homes.		
112	I can only speak for the site I live on and I cannot see that it would make any real difference to this site owner as he would only have received about £9,000 at most in the last 6 to 10 years in commission and has not had to spend any of it on this site.		
113	Can't see much except he might not have a new car every year but neither can we.		
114	None at all		
115	Our home is quite old, but we have spent a fair amount on upgrading and redecoration. We probably pay a lower pitch fee than any new or relatively new home owner would. (See Q.7 for administration of pitch fee levels.) [REDACTED] as an example, we have calculated a conservative annual income from an average size park: [REDACTED] £1518.06 annual income from one residential park home		

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

		Response Percent	Response Total
	<p>██████████ £129,111.60 annual income from an average park. ██████████ £774,669.60 annual income from several parks; (we believe that the owner of our park actually possesses ██████████), ██████████ £64,555.80 monthly income (based on a moderate pitch fee). We cannot estimate how much higher pitch fees than ours and the current commission payment may add to these figures. We consider this (partial) income to be quite practicable as a living wage, and know that our park owner and his family have an ostentatious private lifestyle.</p> <p>██████████ owns approximately ██████████ parks.</p> <p>We are aware that our park owner has diverse business interests besides park home and holiday sites, one of them being a ██████████ enterprise, and his and his wife's name have also been found associated with ██████████</p>		
116	The commission should not make any difference to the viability of park home sites. Maintenance and running costs will have formed part of the original business plan.		
117	Don't know		
118	The ground rent would increase for everyone I suspect Services like garden maintenance (grass cutting) would become chargeable Water supply is currently included in our ground rent but this may become a separate cost		
119	Because the frequency of commission payments are unknown and uncertain, any change is unlikely to have any serious impact on viability in the short or long term.		
120	NONE to us as residents on the park, however I do know that it would certainly line the pockets of the site owner. I feel all it does for us is to restrict our opportunity to move on, again this don't happen with bricks and mortar..		
121	Take our home for example, will pass to our son, The price will be enhanced by our lovely garden, summer house + shed.		
122	Park home living would become more attractive if prospective purchasers knew they would not immediately lose 10% of their investment. Several of my friends and relatives have considered buying a park home and this was the major factor for not pursuing the move.		
123	For the Site Owner to answer.		
124	Park homes have been sold by owners and prospective sellers have been let down by purchasers because of the 10% commission		
125	<p>A reduction/abolition to the payment of commission will have a negative impact on the viability of our park in both the short and long term.</p> <p>Attached letter from our Accountants states, "for the five-year period ended 31st March 2016, a trading net loss has been sustained, of £229. The site is therefore barely in a break even situation and the removal of any entitlement to commission earnings would severely impact on the financial viability of the business and potentially place in doubt the continued operation of the site."</p> <p>It's unlikely that we'd be able to secure borrowing based upon the income generated by the park.</p> <p>At present, the % of income generated from commissions exceeds the income generated from pitch fees. Our pitch fee is considered to be quite low (£██████████ per week</p>		

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and / or the long term? Please provide any evidence, supporting documentation you have to support your comments.

			Response Percent	Response Total
		for homes up to 12ft wide, £██████ per week for homes between 12ft and 20ft wide) and any increases can only be linked to CPI. A reduction in our yearly income will mean that we will have to try and reduce overheads.		
126		not known		
127		Dont know - the owners on my park don't communicate with residents. But as there are not many sales per year, they shouldnt rely on commission income to keep the business afloat.		
128		No idea.		
129		I have absolutely no idea given that I do not know how the current commission income is used.		
			answered	129
			skipped	46

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

			Response Percent	Response Total
1	Open-Ended Question		100.00%	116
1		I do not see how anything could change as a result of the removal of the 10%. The site fee can only be changed if there has been significant improvement to the site.		
2		Their income already looks sufficient.		
3		Obviously by attempting to increase the pitch fee, they will also manipulate utility bills, by refusing to pass on discounts given to them by gas and electric suppliers for direct debit and prompt payment arrangements, general maintenance will become Improvements, threats to close the site and leave us homeless, the list will be endless.		
4		Making sure that the site is friendly and well maintained. Keeping a good relationship between the residents and the site owner.		
5		N/a		
6		By the usual route, which is frightening elderly residents, with threats of increased pitch fee's, charging extra for our gas, water and electricity, pretending that normal site work is an improvement, and must be paid for, and of course the jewel in the crown, I am selling the land on which your homes are stationed so get off and take your homes with you.		
7		Annual site fees and business rates could increase.		
8		Unscrupulous site owners are the norm rather than the exception. Mitigation tactics could include short term leases, harassment to acquire homes at a fraction of their real value, preventing suppliers entering a site unless they pay commission, charging exorbitant prices for connecting to utilities, introducing high maintenance charges, forcing people with older homes to sell and then buy new at sky-high prices, excessive charges for fencing and flagging, and leasing parks to other companies owned by family members so that more maintenance charges can be introduced -- for an example, see the expose in Private Eye magazine covering June 2-15, page 39.		

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
9	Would have no impact		
10	What risks?		
11	There are no risks therefore there should be no mitigation.		
12	What risks?		
13	Do not understand the question.		
14	Don't know.		
15	nothing		
16	Unscrupulous site owners are the norm rather than the exception. Mitigation tactics could include short term pitch leasing, harassment to acquire homes at a fraction of their real value, preventing suppliers from entering sites unless they pay commission -- on gas bottle sales, for example -- charging exorbitant prices for connecting to utilities (██████████), introducing high maintenance charges, intimidating people with older homes to buy new ones at sky-high prices from the site owner only, excessive charges for flagging and fencing, leasing parks to other family members so that more charges can be introduced -- for an example, see the expose in Private Eye magazine covering June 2-15, Page 39.		
17	They could I suppose raise pitch fees, but then residents would by law be able to refuse to pay for increases if they were not fully justifiable.		
18	None.		
19	Only a site owner can answer this question.		
20	no evidence whatsoever, again this is a closed shop.?????		
21	There has been talk of them upping the monthly service charge. This is already ridiculous, since it invariably goes up according to inflation every year whilst no new or improved services are promised or forthcoming. The service charge I pay here is double that I paid on a two-bedroomed leasehold flat in N Wales I lived in immediately before I came here, and there I had the opportunity, through the residents' association, to influence at what level it was charged and how it was spent. That is not an option here in any sense.		
22	By increasing pitch fees		
23	probably none		
24	no evidence whatsoever, again this is a closed shop.?????		
25	Instead of receiving a commission on the sale of the home he should receive a sum to compensate for giving the security of tenure. This could also be a percentage of the sale or a fixed amount. This would give the seller of the home all the benefit of selling THEIR HOME plus giving the park owner an income stream. It may even add to competition between owners as it could be flexible.		
26	As stated the yearly ground rent is covering the costs		

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
27	Not known		
28	I am a home owner so would have no evidence but I think the obvious solution for most site owners would be to increase site fees and, possibly, increase the cost of purchasing a park home		
29	By providing a decent park that residents will support are a good place to live.		
30	Not see any improvement		
31	I again repeat ask the Park Owner		
32	As above		
33	Not known.		
34	By raising rent		
35	they will charge higher pitch fees which would affect those elderly owners who are definitely not likely to sell their homes		
36	So far no mitigation on this site. It still floods in the wet weather and we are having to pay our higher insurance as a ` flood risk area because of this.		
37	It is my belief that they will increase pitch fees.		
38	As above		
39	Not sure as only one man Mon to Friday on site 9-4 and one occ part timer.		
40	don` t know		
41	We have lived on the Park for over three years, and have seen a dramatic decline to our living conditions, due to lack of maintainance to the park. Our property, in this present environment will have depreciated considerably. We would be hard pressed to sell our home in the current location, bearing in mind the lack of maintainance.		
42	Sell new homes, usually an 80/100% mark up.		
43	no idea		
44	No information, sorry		
45	I believe that the monthly charges which we all pay in monthly Ground Rent charges, cover any overhead costs for the current and future provision.		
46	by providing a park home site that people who want to buy a park home are going on a friendly well maintained site and when talking to existing residents they are happy with the site and the way it is run		
47	I believe the only risk would be to their profit margin.		

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
48			I don't know.
49			N/A
50			N/A
51			I am not entirely sure
52			I have no reason.
53			Again the site owner does not use the commission for the site there is no impact.
54			I cannot see that the Park Owner takes any risk as his Park always has Residents paying every month as already stated.
55			See above
56			Increase the pitch fee.
57			Unable to answer this should be directed to the site owner
58			Don't know
59			They can sell the park home sites or pass them over to local authorities, Park owners have made a killing for far too long on the back of park home owners for far too long, just ask the residents regarding site owners and the answer will be the same I guarantee, the owners have little or no interest just concerned with making money.
60			dont know
61			It is suggested in the consultation paper that it could be through an increased pitch fee but this has been fixed by the consumer price index. I believe that units paying [REDACTED] in pitch fee per annum [REDACTED] should more than compensate for the level of any necessary improvements.
62			They would do what they always do. Find new ways to rip off their park owners
63			possible increase in pitch fees
64			By providing a park home site that existing residents are proud to call their home And to live out their retirement
65			By increasing the pitch fees????
66			By making sure that people wish to purchase their new Park Home on a friendly, well maintained Park Home Site. By providing a Park Home Site that existing residents are proud to call their home, and one which they will happily promote as a worthwhile place to live out their retirement in peace and security.
67			Do not know.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
68			we don't know.
69			See above
70			Knowing my site owner, by tripling the rent and service charge.
71			By making sure that people wish to purchase their new Park Home on a friendly, and well maintained site. By providing a PH site that existing residents are proud to call their home, and will happily promote as a lovely place to retire to.
72			By making sure that people wish to purchase their new Park Home on a friendly , well maintained Park Home site By providing a Park Home site that existing residents are proud to call their home and one which they will happily promote as a worthwhile place on which you really want to live out your retirement in quiet enjoyment
73			I would actively seek to reduce outgoings on maintenance. The only option would be to put large project expenditure through the pitch fee, so that all park home owners would have to contribute or the work would not be carried out. If the programme of repairs and updating is not kept up this would affect the resale value of the park homes and the moral of residents.
74			I see no impact of any investment on the site currently therefore I cannot see this changing.
75			n/a
76			Not known
77			I dread to think.
78			Please see our response to question 2
79			don't know
80			It is not clear how the park owner would mitigate these risks as the ground rents are limited to inflationary increases.
81			n/a
82			Not relevant.
83			Probably they would want to increase the monthly site fee.
84			the site owner increases the rent every year in line with inflation and when asked to improve the sit such as lighting or road repairs the site owner wants extra money in the form of a further increase in rent if we want it done
85			don't know
86			Restricting access to traders unless they pay commission. In the past, gas and coal suppliers have been told they were not allowed on this site so that residents were forced to buy from those chosen by the site owner or manager. The coal supplier, for instance, had to pay the site manager £3 a bag commission and a gas bottle was £10 more than on the market. Following a change of site ownership, a gas fitter was

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
	ordered off the site when a home owner tried to avoid a [REDACTED] gas main connection charge demanded by the owner. The normal gas board charge is [REDACTED]. Excessive charges have also been levied for the likes of fencing and laying of flagstones, whilst unsuspecting new home buyers are being charged high pitch rents. The latest rip-off appears to be site owners trying to rent pitches on a short term leasehold basis. They could also try to make the owners of older homes buy new ones after a set period -- say 15 years -- as already happens on holiday sites.		
87	Site owners need to address this item.		
88	Possibly increase ground rent, charge home owners for every slight and necessary upkeep on the site. ? Or refuse to do any work on the site . I really have no idea.		
89	Improvements to the site will cease to mitigate a reduction of capital inflows. Alternatively and most likely, site owners will significantly increase the upfront cost of homes to prospective buyers.		
90	N/A		
91	Again cannot say.		
92	Thats his problem.		
93	Not known - with an average of 1 resale per year on this Park there's been no noticeable effect on residents pitch fees etc. Our Park is not yet complete, with [REDACTED] more plots yet to be finished & sold, so all the owners income has not stabilised therefore any forecast of such action would be a guesstimate.		
94	the ground rent from the properties covers this		
95	Not privy to this information.		
96	I do not believe the commission has much of an impact on the viability of a site.		
97	They won't !!!!!		
98	NA		
99	As there appears to be very little regulation on park homes site owners (Rachmanism?),the obvious response will be to increase rents above their already high level.Park home owners do not have any apparent legal pathways to appeal against outrageous increases.Very little legal protection at all in fact, as compared to residents/owners of bricks and mortar properties.		
100	?		
101	He could put up site fees but as the legislation Swiss he can only put it up by the rate of inflation that shouldn't happen I think it will help people sell there homes easier as the commision does put people off buying		
102	Not known, but as I previously said it is an unknown factor which cannot be planned for		
103	One way in which a park owner may seek to mitigate the impact of the loss of the 10% commission would be to endeavour to purchase the home from a potential seller		

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

			Response Percent	Response Total
		himself, then advertise and sell it to a new owner. Historically, the pitch fee for a home was set by the park owner when the home was originally introduced to the park (Mobile Home Act 1975). Subsequently, the pitch fee has increased annually by the percentage of the RPI, (Mobile Home Acts of 1975 and 1983), and currently the CPI (Mobile Homes (Wales) Act 2013). The pitch fee level is associated only with the park home's Written Agreement, which is passed to successive occupiers, no matter how many times a home changes hands. The park owner may therefore set the pitch fee for a home that he owns, and sells to a buyer; this would normally be a new home, or one brought in from elsewhere to be installed on the park. We have recently noticed a couple of instances on our park, where, for reasons unknown to us, the park owner has purchased the home of a resident intending to move away or having been forced to leave through ill health, and sold it to someone else. This may allow him the opportunity to reset the pitch fee to a level of his choice, which could possibly be the thin end of the wedge, but is impossible to assess without access to private information from the new resident.		
104		Don't know		
105		The ground rent would increase for everyone I suspect Services like garden maintenance (grass cutting) would become chargeable Water supply is currently included in our ground rent but this may become a separate cost		
106		As an educated guess, a park owner will probably look to increase pitch fees as this is their only known and regular form of income. It is no different however to interest paid on bank deposits. You invest to make a return.		
107		As previously stated the park owner has no passion for this park, its not a labour of love for him which he will clearly state to you. one is always taught that to equimilate one has to speculate, however I believe that the site owner was absent when that lesson as being given		
108		The owner will get 10 percent for the whole of it. It should just be for the home, don't know what the money is used for.		
109		No risk		
110		For the Site owner to answer.		
111		Do not know. Homes would be easier to sell if the commission no longer applied		
112		<p>Examine Accounts, and seek to identify ways in which we might lower outgoings:-</p> <ul style="list-style-type: none"> • Reduce maintenance & repairs to bare minimum – sufficient to satisfy licence requirements, but making no improvements • Turn off streetlights overnight (in line with LA practice within town) • Fell trees rather than carry out continuing periodic topping • Reduce grassed areas and replace with maintenance free alternatives • Minimise time spent by selves and staff on outside and office work (we'd consequently be no longer able to assist residents with ad hoc removal of unwanted household items, taking in parcels, providing guidance re: WG re-sale documentation, etc.) • Refuse to carry out further ad hoc tasks for temporarily incapacitated residents (cutting grass & shrubs within plots, minor repairs, identifying problems – and solving them where possible) • Reduce office 'opening hours,' with greater reliance on answerphone, reducing opportunities for face-to-face time with residents, pastoral calls, etc. <p>Delay progressive/improvement works</p> <ul style="list-style-type: none"> • Wait for problems with services (sewerage, electricity, water) to arise before dealing with them – rather than trying to carry out progressive works in anticipation 		

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

			Response Percent	Response Total
		<p>Abandon plans for cosmetic improvements</p> <ul style="list-style-type: none"> • planting of shrubs • improved parking • further paths <p>NB. We'll only consider carrying out improvements where the costs can be recouped from existing residents (whereas to date we've carried out several improvements (additional roadways/paths/lighting, cosmetic planting, signage) at our own expense, through a desire to enhance the appearance and amenity of the park.)</p> <p>Seek to increase income</p> <ul style="list-style-type: none"> • look to increase pitch fees & standings charges for water & electricity & sewerage (through appropriate channels) • charge for time spent investigating difficulties with homes/services, which turn out to fall beyond remit of park owners' responsibilities • consider re-introducing a number of rental homes on the park • consider utilising land adjacent to park (which is accessed via park itself) for non-residential park commercial purposes • look for ways to generate income by other means (reducing time available to spend on matters associated with park.) 		
113		not known		
114		Don't know		
115		He may increase, ground rent to compensate.		
116		I have absolutely no idea.		
			answered	116
			skipped	59

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

			Response Percent	Response Total
1	Open-Ended Question		100.00%	139
1		Homes on this site have been for sale for years before securing a sale. Along the way, a number have had interested buyers who have then dropped out on discovering the financial implications of the purchase. One has been for sale (and still is!) for over █ years! It, and all the homes on this site, are less than █ years old.		
2		Paid £140,000 when bought property in █ and not been able to re-sell at that price. Have reduced to █ as have been trying to sell for approximately █ years. Can't afford to buy another property if we reduce any further, as sale price, minus 10% █, minus solicitor's and Agent fees - say █, means we receive £110,000.		
3		It will immediately devalue the value of your home by that 10%.		
4		█ prospective purchasers on our park have dropped out when the 10% resale tax was fully explained to them, the glossy sales brochures carefully avoid mentioning this penalty at signing time, having 10% of your equity stolen from you at a time when most elderly residents are considering sheltered accommodation and require every penny to complete a transaction is grand theft, one elderly resident begged the owner to reduce the tax allowing her to move, his reply " get lost " and read the mobile home act.		

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
5			
	In my view it makes it harder to complete a sale. On our site there has been numerous occasions when a sale has fallen through when the purchaser realises there is an extra 10% to pay on the purchase price and that they face losing another 10% on the future sale of their property. It is my belief, and that of the other residents on our site, that the abolition of this charge will eliminate this problem		
6			
	We are at the moment trying to sell our park home, buyers are put off by the commission		
7			
	I was honest with my two prospective purchasers in explaining the additional cost on top of the normal asking price, adding on the 10% plus recovering the £12,000 I have spent on the site owners pitch (my garden) which the owner would take £1,200,not surprisingly I am still living here.		
8			
	We are unable to have a sufficient amount of money to purchase an alternative house. Most people living in a park home are pensioners/on benefits and have not got savings to back up the remaining sale amount available after commission has been paid.		
9			
	We had difficulty selling our previous park home on this site, as prospective purchasers were at a loss to understand why any commission should be paid to someone for doing nothing. Most solicitors don't know anything about this commission, so some of our would-be buyers pulled out after taking legal advice.		
10			
	It would mean that you would be selling your home at a loss		
11			
	The payment of commission is the biggest drawback for any potential purchaser when they realise that 10% of their potential property does not belong to them, it belongs to the park owner.		
12			
	Many prospective purchasers are put off by the fact that they have to pay 10% to the park owner therefore I think that the sales would be much easier for both purchasers of homes and the sellers.		
13			
	The payment of commission is the biggest drawback for any potential purchaser when they realise that 10% of their potential property does not belong to them, it belongs to the park owner.		
14			
	It reduces the fund to move on to other property.		
15			
	None.		
16			
	If the owner does not receive commission he will not give the new owner a contract		
17			
	We had difficulty selling our previous home on the site because prospective purchasers were at a loss to understand why any commission should be paid to someone for doing nothing. Most solicitors don't know anything about this commission, so at least one of our would-be buyers pulled out when their solicitor queried the arrangement.		
18			
	I suppose it would mean that the residents would have to take the cost of the commission into account when setting a price for selling their property.		
19			
	It reduces there income to buy by 10% to move on for whatever reason.		
20			
	It could mean that the resident could not raise enough money to purchase another property and therefore would not be able to move home. A typical financial loss would be £12,000.		
21			
	we are not sure if the commission has to be included in the selling price or, sell at our valuation price and pay the 10% to the site owner. sorry we have no proof.		

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
22			
	I have not ever sold a park home, but I imagine some buyers - if they were aware of it (I was not) - might resent it. As for the seller, s/he would feel obliged to get the maximum price to compensate.		
23			
	I would imagine it has a detrimental affect, but never having sold one I have no evidence of that		
24			
	The commission payment puts a lot of buyers off because they see their investment depreciating before thry have moved in.		
25			
	The commission payment puts a lot of buyers off because they see their investment depreciating before they have moved in.		
26			
	we are not sure if the commission has to be included in the selling price or, sell at our valuation price and pay the 10% to the site owner. sorry we have no proof.		
27			
	It makes it harder to sell.		
28			
	In reality as I have said previously it's practically impossible for the home owner to sell the site plus the home whereas if it became the norm for a premium for the site to be paid to the park owner then that would suit both parties. There would have to be safeguards put in place on maximum charges so that the park owner could not artificially inflate the to prevent a sale		
29			
	It means that the occupier is losing money as the have to raise the price to cover the commission and then drop the price of the sale because of the of unkempt conditions of most site including this one.		
30			
	Not known		
31			
	I don't know and have no evidence. Also I have only bought one home which was a new build. However, as the commission is in the selling price and new owners would only pay what the home is worth then it would obviously impact on the price received by the resident. This would then impact on their future options.		
32			
	This commission can put off buyers that have no idea about this commission until they investigate park home living.		
33			
	the seller has to incorporate the 10% in their sale price or therefore making the sale less attractive		
34			
	Non at all		
35			
	Ask somebody who has just sold. I know when I come to sell I will make sure he does not know how much I sell it for as it does have an impact on the person who is buying.		
36			
	Increased overall costs is pure economics - if a product is not competitive it's more difficult to sell		
37			
	Park homes do not hold their value as a more conventional house does and in most cases loses value. Add this to estate agents/solicitors fees etc. Then take off the 10% commission. This leaves existing occupiers with reduced funds to buy another home, or pay for sheltered housing, care etc. The effect is that to be able to sell in most cases a resident would have to take into count a substantial loss.		
38			
	They have to factor the 10% in to the sale price in order to achieve a decent price		
39			
	i think because the park owner are paid the commission this means that if you are selling your home you would have to do it officially through and estate agent and incur those fees as well and not be able to sell your home to a friend or family member without going through , and estate agent, also what if you wanted to gift it to someone, what happens then, its a complicated issue you would have to keep it all above board.		

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
40			Only in that they have to upgrade their homes specifically by `landscaping their gardens` at a greater cost and from then on it is by hard work to keep them in the good condition they have upgraded them too. Even then some have larger gardens than others and we are getting older by the minute, so instead of taking a commission they should have paid for the upgrading or will this be another `commission` charge.
41			The current 10% commission level reduces the sale value of a property which due to it's very nature and description (mobile home) reduces in value year on year due to depreciation.
42			I am a new occupier who did not pay as it was the previous owner who did. The asking price of a home can only be determined by market value alone. The seller has to take a hit, but as I am staying here for life, it will not concern me
43			I understand Owner residents have lost a sale when a prospective purchaser learns of the ten per cent charge but have no personal experience of this
44			A lot!!! puts many off as most purchasers are retirees and if they want to sell in future having to pay 10% puts them off No matter where the park or location is or price of park home.
45			Commission on this site is paid by the seller - not the buyer. This means that people like me who are trying to sell have less with which to buy their next home.
46			you have to take into account the commisson when selling
47			Local Estate Agents struggle to sell Park Homes, partly due to the Commission scenario. Together with Estate Agent Fees, monthly ground rent payments, and Council Tax at Band B currently standing at £■■■■ per month, buying a Park Home is not a viable proposition for many elderley people (The age limit on these parks are a minimum of 55 years of age). On top of this, grieving relatives are then to lose 10% of their inheritance, as well as all the other monies required to deal with estates of the deceased.
48			The resident selling pays the commission, not the new occupier.
49			the amount of commission that has to be paid puts people of from selling
50			It means it reduces the price of the home, and puts people off buying park homes because of the commision. Also the owners are getting commision for doing nothing and that does not seem right.
51			Not sure as the resident would advertise the home to include the commission rate. See question 1
52			From past experience spanning 20 years, most people buying a used Park Home are new to park home living and so accept that the differences in conveyancing to those of normal house purchasing systems.
53			that the new people coming on to a park home site realise that park home living is different to brick and mortar living and realise there are rules to follow but the residents are friendly and helpful and would not have to worry about paying the 10%
54			You are not able to move to equal accommodation as you have lost that value
55			It obviously puts up the price of the Park Home making it more difficult to sell
56			I don't believe the charge affects the residents ability to sell their property, it only takes 10% of the market value of the park home away from the home owners.
57			I would think it affects them dearly, you can not put you price up to high to cover the 10% fee.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
58			Makes it more difficult because the price is distorted.
59			It makes it more difficult to sell, as the prospective purchaser (the buyer) has to pay 10% of the selling price to the site owner. So, a house valued at £86,000 would mean paying £8,600.00 to the site owner.
60			If I wish to sell my park home in order to move to another area I would have to put it up for sale for at least £10,000 than it is actually worth. Having then, hopefully, found a purchaser then I would have to take away 10% of the purchase to give to the site owner. I would then have to purchase another home with the reduced amount available to me.
61			It makes a huge difference because the seller does not have as much money to buy another home and the buyer might/will change their mind about buying once they realise that if they want to sell, they too will have to pay.
62			New occupier doesn't pay commission, the seller does.
63			The payment of commission is paid by the new occupier but this comes out of the selling price, therefore it is the seller who pays not the buyer.
64			Regardless of any increase of the valuation of our Park Home, in order to realise any profit at all, should we want to sell, we would have to add an extra 10% to the selling price in order to pay the site owner. Most Park Home owners now feel completely trapped, unable to move on because of the inability to realise any equity.
65			When a proposed purchaser becomes interested in a property they ask all the relevant financial questions, and on discovering the purchase price paid by the current Home Owner is thousands of pounds, (sometimes as much as £25,000) more than the present selling price, meaning a huge loss of equity, and the fact that there is a further sum of 10% to be paid , they decide that for them it is not a viable purchase and go no further with their intended purchase of the Park Home. It can take many years before a Resident Owner succeeds in completing a sale of his property.
66			This could deter people from buying the property. We only bought our property as we have a second property we rent out to help cushion us against the depreciation of the park home and commission we would need to pay. We were afraid otherwise we would never afford to move again even if due to ill health. Many people who buy Park Homes are over 50 so need to consider what happens if their health deteriorates. We would not have bought the home if we did not have the security of a second property.
67			It would be easier to sell a property if the potential new owners knew they wouldn't have to pay a commission if they sold it at a later date. Park residents would be more likely to maintain their homes to a high standard and make improvements knowing that any money they have put into their homes won't be swallowed up in commission fees if they decide to sell.
68			Simple 10% commission added up to a considerable amount of money £15000 on a house worth £150,000 Which would only leave £135,000 how would people living in bricks and mortar feel if they had to pay this outrageous amount if they wanted to sell their home.
69			You will have less money to buy another property
70			Imagine purchasing a new home say for £100,000 and then have to sell for health reasons, and be faced with losing 10% of the value of the home so giving away £10,000 for no good reason. People would be devastated and out of pocket, also in many cases if the homes do attract increase in value over a period of years, selling them would not benefit the owners who may have spent a lot of money meantime in up keeping the property.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
71			no evidence
72			As soon as you move into a unit the value of your property is diminished by 10%. To move out of the Park and be able to move to a similarly property valued at the cost you first incurred you have to ask for 110% of the actual value and explain to prospective buyers that on purchase they will have to pay a further [REDACTED] every month in order to live there. Sales are therefore extremely difficult.
73			It makes Park homed virtually un-saleable. The vendor is forced to either take a huge loss on what is probably their only source of capitol, or they have to inflate the value of the home by 10%. Then the home becomes way too expensive, and will not sell
74			the park home as I understand is sold gross to the potential purchaser, the seller then reimburses the park owner
75			It took me a long time to go down this road, for that reason In fact about eight years, before I could get my head around it
76			not known
77			Am I missing something here! I was under the impression that the 10 p/cent was paid by the seller?
78			This would very much depend on the character of the potential purchasers. If they are confident people to whom the vagaries of living on a Park Home site, are much different from the conventional Bricks and Mortar homes. However, if the prospective purchasers are made nervous by finding out about the Park rules, that they new nothing about previously, then you might have some difficulty in selling them your home. Its my belief that the abolition of that unjust 10% commission in WALES will confine these problems to history
79			Do not know.
80			we don't know
81			I am a resident owner and at present I would would be liable to pay the 10% commission on sale of my home, not the new occupier. However, although I can not supply actual evidence, I have been told by serveral people that they would be put off buying a mobile home if it meant paying a 10% commission iwhen they resold - and if they did decide to buy would want a reduction of 10% off the asking price to cover this event - i.e meaning as a seller I would be loosing 20% off the value of my home !
82			It makes selling more difficult because park home owners inflate the asking price to cover the 10%. Also it may deter a new buyer knowing if they have to move through illness etc. they would loose 10% of the sale price or be unable to sell easily if they too inflate the asking price to cover the commission.
83			It can reduce the chance of selling if you raise the asking price to cater for the 10% commission.
84			As a resident, I believe this would encourage the site owner to 'sale block'.
85			Because straight from the start MY property is worth 10% less than I sell it for, that is the same as the auction site eBay, they do nothing but get 10%. How is that fair? I have looked into selling my home, the site owner doesn't like such enquiries and has strict rules on how it is advertised, as well as the final say on whether or not someone can buy it, along with the age restriction it makes selling the home harder, and the 10% I'd have to pay the site owner is 10%. I could be using as a deposit for a new home

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
	(bricks and mortar). The site owner 'knows' the people already on site, they know they are well-behaved, any new tenant is a risk and I think that site owners like can make it harder to sell homes because of that fact.		
86	It is my belief that the abolition of the unjust 10% commission in Wales, would greatly enhance the sales of Mobile Homes !!		
87	this would very much depend on the character of the potential purchases, if they are of strong and confident personalities , people to whom you can explain the vagaries of living on a Park HOME site and how owning your home on another persons land is different from conventional bricks and mortar homes , you should have no serious problems However if they are of a slightly nervous disposition , perhaps people who are more happy with conventional living and who are made nervous by finding out rules that they previously knew nothing about ,you will probably have some difficulty in selling your home . these personal observations are from my experiences of assisting close neighbours in the sales of their Park Homes it is my belief that the abolition of that unjust 10% commission in Wales will confine to the realms of history.		
88	This has never affected the sale of any park home on my site to my knowledge.		
89	See above answers.		
90	the commission would increase the price of the home reducing the chance of selling. if the existing owner reduces the sale price to pay the commission themselves it would make selling and purchasing a new home not possible. therefore owners would not be able to move if their circumstances changed.		
91	Obviously it will inflate the price of any mobile/park home.		
92	It makes it very hard as to sell the price has to be high because we have to pay the park owners		
93	I bought my park home in ignorance of this punitive clause. My solicitor did not inform me of this clause as I would have thought twice about buying it if I had known. However, the fault was mine in not knowing.		
94	Previously the 10% has been absorbed into the sale price and the seller has passed on the commission to the park owner. With the new legislation the buyer pays the Park Owner direct it is difficult to explain this levy to prospective buyers.		
95	we don't think it effects the resale of a park home but non the less we are 10% short on the value of our home.		
96	Again my perception of the commission is that it is payable by the seller, there are ceiling prices on the sale of used park homes so commission cannot merely be added to a sale price. The reduction of 10% plus any selling fees from estate agents, takes a major chunk off the top line sales value meaning that a house owner could feel trapped and financially be unable to sell and move. A reduction in the commission rate could in fact reduce this problem and enable a higher turnover rate and reduce the effect upon the park owner		
97	n/a		
98	10% added to the price paid is a massive disincentive.		

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
99			I believe the price requested has to reflect the commission. Therefore the seller loses.
100			it can be very difficult to sell a home when the new buyer knows they have to pay 10% commission if they sell again, thi in some cases puts them off buying or they negotiate harder for a better deal.
101			don't know
102			In reality, you have to add the 10 per cent to your selling price and this may take it beyond the budget of potential buyers. If you tell a potential buyer that they have to pay commission to the site owner, they just cannot understand why and most solicitors haven't a clue when asked by their clients to explain it. This puts people off because they think they are being diddled. We had trouble selling a previous park home because of this. Also, [REDACTED] was charged £1,100 by a solicitor for needless searches of the land registry and other actions which only apply to bricks and mortar Then there was the 10 per cent extra, of course.
103			The home owner has to take into account that they may lose 10% of the selling price if they wish to sell because a buyer would only want to pay the market value of the home not the market value plus 10%, so the home owner always loses out. This 10% issue only applies to park home owners not the general housing market in the UK.
104			I have encountered this myself when a prospective buyer realised 10% of the price asked was going to the site owner that buyer has pulled out. They realise they will also have to pay when they sell. This is not only a problem with park home sites. Many retirement or leasehold properties have the same type of " commission " paid, sometimes on buying and again on selling. It's usuary, pure and simple.
105			I don't believe the payment of the commission affects the ability to sell. In the first instance the occupier has bought the home at a reasonable price, as the 10% amount is back-ended, thereby making a park home more affordable. Of course that is on the understanding that when sold the 10% is then payable to the park owner. The buyer/occupier is by virtue of the back-ended payment, being financially assisted in acquiring the park home lifestyle.
106			Increase the price of the park home
107			As I have not sold I cannot give an answer.
108			It usually kills the sale because the buyer realises that if and when he or she sells, they will lose a massive amount of money
109			It may not greatly affect the ability to sell but it certainly affect the ability to purchase or reduce the choice of another property by the seller. Particularly if the seller were required to enter a nursing or residential home. We are, after all, part of the older population!
110			This a fee that is really passed on to the seller as most reduce the by 10% to deter buyers.
111			Significantly. There seems to be no evidence that
112			The 10% commission greatly effects the sale price, be it on the seller or the purchaser of the park home, all upkeep of the park homes and the site pitch that it is situated on is done by the owner of the park home and not the site owner all the maintenance on the property and up dating of the property is done by the owner of the property not the site owner therefore why should he obtain a 10% commission on our properties when sold
113			The Park Home asking price is inflated in order to counteract the 10% making the sale more expensive there by reducing the amount of perspective buyers.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

		Response Percent	Response Total
114			
	It should noted that estate agents fees will also need to be added to overall cost of selling a park home, making the cost to sell in excess of 10%		
115			
	It means that every time a park home is sold the owner has to budget for a loss of upwards of £8000.		
116			
	It doesn't as its industry standard, every one knows what they are signing up to, Please remember the the purchase of a park home is significantly cheaper than any other form of dwelling.		
117			
	NA		
118			
	The commission is paid by the seller of the park home on this site and therefore makes the sale price 10% higher.The seller is thus left with less capital with which to purchase another park home in which ever area he/she wishes to move to,and again this purchase price will be higher due to THAT seller having to pay commission. Double whammy!		
119			
	No evidence, but it is obvious isn't it? My next move would only be into a care home so it would impact on how much money I would have available.		
120			
	As I've said it is does put people off that's why it takes long time to sell. We have just sold ours and he will get ██████ for doing nothing		
121			
	This would depend on the character of the potential purchaser(s). If they are of strong and confident personalities, people to whom you can explain the vagaries of living on a Park Home site and how owning your home on another person's land is different from conventional bricks and mortar homes, there should be no serious problems. However, if they are of a cautious disposition, perhaps people who are happier with conventional living and who are made nervous by finding out about rules that they previously knew nothing about, you might have difficulty selling your home. We cannot provide any precise evidence to reinforce these comments as we have never attempted to sell our home, and apart from the illegal incident stated above, we have no knowledge of other home sales.		
122			
	A potential buyer for park home may consider that the the 10% commission in effect means that in reality they only own 90% of the home, and that If circumstances arose where they has to change their location, the lower cash available would probably necessitate the purchase of a poorer property.		
123			
	The payment of commission inflates the price of the park home for the buyer and reduces the amount received by the vendor. This limits the vendor's options for alternative accommodation and can lead to residents being trapped on the park. This is of particular impact when the vendor's need to sell is caused by health/age related problems of often vulnerable residents. There is also the all too often experienced situation where the park owner is of a less than scrupulous type and causes residents to move because of unfair/unpleasant/bullying treatment. Added to this is the cost of estate agent's fees which are calculated on the full selling price (including the commission) thus further reducing the amount received by the vendor.		
124			
	When I purchased it was a little annoying that the price was set at 90 percent, rather than 100 percent. I offered 100,000 thinking the total would be 110,000 but it was upped to 111,000 because of the maths of doing it that way around. It would have been clearer to have made the full offer, then worked out commission reduction.		
125			
	Don't know		
126			
	To me its an immediate unrecoverable loss which cannot be reclaimed upon resale Perhaps they no longer have the funds to maintain or improve the home once they have paid that 10%!		
127			
	Unless the park home is brand new and being sited on a previously unoccupied pitch, it is not the new occupier who will be paying the commission. It is the seller. Why? Because no one buying a park home from an existing owner at a known price will want		

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

			Response Percent	Response Total
		to hand-over an additional 10% of the sale price to the site owner for the privilege of moving into their new home. Instead, it is the seller who will have to hand over 10% of the sale price to the site owner. Otherwise, a sale is unlikely to be achieved.		
128		As answered in question 6 and again this does not happen with bricks and mortar,		
129		Don't know, you would have to get more in the sale, to try to cover the selling fee I suppose.		
130		It's virtually impossible to sell privately as the Parks insist that the new owner pays inflated site fees immediately even if current owner has already paid them. They then proceed to sell them one of their own as site fees are 'free' for X period of time. This isn't actually the case as new owners end up paying 3 time over 2 years so don't get them for free at all!		
131		The site immediately increase the site fees for a private purchaser sometimes as much as £1000 per year which means however much you paid for your new caravan they always gain it gets to the point that once you are drawn in you are held to ransom		
132		Purchasers realise (if they are well informed) that they will lose 10% of the value right away. Park home have many viewings, but when people realise the implications, they withdraw.		
133		We are happy with where our site is now, but if we wanted another or site the COMMISSION charge would definately put us off!!		
134		It puts prospective purchasers off buying homes		
135		We're unaware of any situation in which a resident on our park has felt unable to, or discouraged from selling their home because of the commission. In many re-sale situations, residents (or the executors of their estate) instruct estate agents to market their homes, and EAs provide guide prices, factoring in their fees and the commission. However, we're doubtful that any reduction in the commission rate will result in homes being marketed for less...or EAs fees decreasing. However, any reduction in amenity, character or appearance of the park is likely to adversely affect the marketability of the homes.		
136		not known		
137		It has a huge impact. Prospective buyers often don't know about the comission until they are advised by the seller, and it does put some buyers off as its an extra added cost to the lost price of a home. A friend of mine at my park recently sold, and he needed a quick sale. He had to accept a price lower than the asking price so the buyer could afford to buy as they knew they had to find the extra money for the commission; the seller effectively "paid" the commission instead of the buyer, but had to accept that in order to sell the home quickly. That does not seem fair, even in a "buyers market".		
138		As far as we know, it is the seller who pays the commissison.		
139		When a resident wishes to sell a home the 10% commission to be taken by the park owner has to be considered and how it will affect the asking price. A potential buyer has to consider the value of the home both in terms of the asking price by the seller and of the additional 10% to the park owner – a rather large sum when you consider the average cost of a home. The thought of paying 10% to a park owner who does nothing to warrant such a payment, can have a big impact on the subsequent asking price by the seller.		
			answered	139
			skipped	36

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	127
1		I believe it is almost impossible, due to planning laws, to site a park home on a normal building plot. Therefore, if you want to live in a park home you will have to go onto a site. The benefits accrue from the community spirit, the sense of security, etc. The downside is not being able to negotiate your own fuel deal, having restrictions on certain activities (e.g. owning pets, erecting sheds, etc.) So far as selling is concerned, park homes sell for appreciably less than a similar bricks and mortar bungalow, despite the fact that very often they are better insulated, fully fitted with modern appliances, etc.	
2		I don't know of any alternative.	
3		The value of a park home off site is NIL, the residential pitch on a fully licensed site is the one factor that encouraged 99% of residents to invest their life savings for this type of lifestyle, after purchasing a unit from the manufacturer and siting same the average profit to the site owner will be £70,000/£100,000,he/she now has a captive community, totally helpless, at the mercy of unscrupulous owners, who in many instances will attempt by whatever means,to force people to sell and maximise his sales profit.	
4		The provision of a well maintained pitch on a well maintained site will probably be worth about 50% of the Park Homes value. The standard charge the manufacturers make for a modern Park Home on average about £90000, some a great deal more some less. When this is sited the Park Home purchaser can expect to pay double that cost. This is the profit the site owner makes plus the costs incurred in transporting and siting the home and providing services to the pitch. This purchase price reflects the new owners right to their pitch and is confirmed in the written agreement. On the future sale of their home the resident also sells the right to station a home on that pitch and will also transfer their written agreement to the new owner. Nothing has changed, the site owner still receives his pitch fee and has made no monetary outlay to facilitate this sale. It cannot be right that the site owner receives a commission on that sale.	
5		N/a	
6		An off site park home is WORTHLESS, even if you could find a park home owner who would allow you to station your unit on his/her land, the cost would be £70,000 minimum, which is the profit an owner would receive from selling a new unit on an available base.	
7		Unknown	
8		Doesn't add any value at all. Park homes are not park homes without a pitch, otherwise they are static caravans.	
9		Nothing would changed	
10		This is a difficult question. In our view the park owner controls that situation when he sells the home. i.e. He purchases the home from the manufacturer or a show then adds siting fees and the location of the the pitch and site.	
11		The value of a good pitch on a well maintained and fully licensed park is probably worth 50% of that park home. The park owners will buy the home from a manufacturer, probably at a decent discount, this would approximately be £75-95000 he would then expect to spend approximately £5-10000 on siting that home and then when he sells the home he would be charging approximately £180.000 - £250.000 to the buyer. The selling price reflects the new owner's rights to the pitch (via the written agreement) providing that he pays a monthly pitch fee, if the buyer then, in the future decides to sell that home the written agreement passes to the new owner and then they continue to pay the pitch fee and nothing changes except the ownership of that home.	
12		This is a difficult question. In our view the park owner controls that situation when he sells the home. i.e. He purchases the home from the manufacturer or a show then adds siting fees and the location of the the pitch and site.	

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

		Response Percent	Response Total
13			Little value as the pitch is not yours only rented and could become unavailable at any time.
14			None.
15			Doesn't add any value at all -- not having a residential pitch means it's not a park home but a holiday one: it would be like buying a house that doesn't have any foundations.
16			None.
17			Unable to answer this question.
18			at this very moment there is very little value added to a home, it is a difficult time to sell on your park home, the market is not good.
19			I presume this is one way in which site owners justify the commission? Certainly, from what I understand, siting a park home is quite an expensive business.
20			A considerable amount
21			bought on a pitch sold on a pitch, just depreciation
22			A park home needs to be on a pitch so it could be said it doubles in value.
23			A park home needs to be on a pitch so it could be said it adds a lot but the site owner gets a regular income from the pitch fee
24			at this very moment there is very little value added to a home, it is a difficult time to sell on your park home, the market is not good.
25			Very little there have been several sales on our park and not one has been sold with the pitch value being added
26			On a well run site some value would be added ,but as stated on most poorly run sites, including this site you are losing money hand over fist after you have purchased a new park home
27			Not known
28			I believe it would be difficult to sell an unsited park home however I don't believe it would add as much as 10% of the cost as added value
29			The provision of an adequately sized, properly serviced and well maintained pitch on a fully licensed and well maintained Park Home site is probably 30% of that Park Home's value.
30			eg from manufacture bought new 80,000 sited for purchaser is 125,000, so the siting costs are £45,000 to the site owner so they are making profit when we buy and sell the property
31			PARK HOMES LOSE VALUE NOT LIKE A BRICK BUILT PROPERTY. I ALSO THINK THAT A PARK HOME SHOULD BE A BAND A LISTING.
32			Depends on location
33			Again impossible to show evidence you do not clearly understand how Park Home sites and their owners work.
34			We have a static park home so an analogy would be a boat without a mooring place
35			All homes on this site are sold pitched, this is already reflected in the selling price of the home

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

		Response Percent	Response Total
	when new. Therefore there is a mark up and any profit from the sale of a new home goes to the Park owner and does not add value for the resident.		
36	Not sure I quantify a value but all vans here are on a pitch which the park owner installs and sites the vans		
37	about 30%		
38	Not known at this time.		
39	Just like a car, value of a park home is subject mainly to age, condition etc, some increase/decrease in value can be attributed to site location although I have no evidence of this.		
40	As a buyer, I would say the home is worth very little without a pitch as moving costs etc are too high for a move to be considered. Making the right choice in the beginning is very important.		
41	Seems to make no difference on our park as I know most of my neighbours pay the same rate as I. Depends on size of home and pitch and how long you have been there.		
42	don't think it does add value		
43	In its current state the Park Homes on this estate have actually been devalued.		
44	According to law, homes have to be on base (base).		
45	none you have to be on a pitch regardless.		
46	Not sure.		
47	We paid the £60,000 to site our home but the next owner would not pay that, so it does not add any value when the resident tries to sell		
48	I do not have this evidence or overview.		
49	it depends on the size of the pitch and how well kept it is and what the park owner charges in ground rent		
50	None that I can see		
51	I don't have an answer to this.		
52	I would think it would add great value providing the park is kept to a high standard.		
53	The savings in siting fees and costs is negated by the reduction to second hand values.		
54	There is no other option. It is either situated on a pitch and the site owner is paid a handsome monthly fee for this. I currently pay £[REDACTED] per month or the Park home owner purchases their own piece of land. Effectively leasing the land from the Park Owner is comparable to a freehold property. I would say that the Park Owner is financially gaining by having mobile homes pitched on their land, rather than the other way around. Park Home prices increase in value very little over their lifetime, unlike brick built houses.		
55	Looking in various park home magazines that are available in newsagents the average price of an un-sited double park home does not exceed £7,000 to £8,000. A sited park home, depending on the site location and the age of the home could be worth 4 times more or even 10 times more.		

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

		Response Percent	Response Total
56			The home would have to be on a pitch otherwise it is worthless.
57			I have no idea.
58			I do not know if value is added by being on a pitch.
59			None to the home owner.
60			In financial gain, it adds no value at all, as they are almost always sold at a great loss.
61			We believe the site does add value to the property as it is well maintained and in a good area with fantastic views. The same could apply to a leasehold property but as mentioned before land owners of lease hold properties do not get commission when brick homes or apartments are sold. Added value for future residents is also the garden we have spent thousands of pounds on making the property more attractive.
62			This would depend on the site it would be situated on.
63			As already stated we are unable to buy a park home which is to be sited on a licensed site.
64			It doesn't add any value as we have to continually pay ground rent
65			In a lot of cases no value is added, as park site owners see the chance to increase the pitch fee in order to create even more revenue, these fees vary from £75 per month up to £200 per month depending on the locality. Some new park homes are sold for over £ [REDACTED] which is quite ridiculous when for such a home the cost price is a mere fraction of the sale price.
66			no evidence
67			I find this question confusing as it assumes that a Park Home could be non-sited.
68			They are far better sited on your own ground. That's if you can find an authority willing to allow such a building. That's why they are virtually all on a recognised RESEDENTIAL site.
69			the park home is worth as much as somebody is prepared to pay, usually based on local surrounding area house/park home prices
70			<p>The manufacturers standard charge for a modern double park home would be approx. £80-£90k. and a site owner would expect to receive a discount on that published price. it will cost the around £8k to site that home on their park. Depending on the location of that site they will expect to receive between £185,000 to £250,000 for it when it is sold</p> <p>So when the person that buys that home decides to sell it in the years to come they will also sell the right to station their home on the park site they will also transfer their written agreement to the new owners on completion of the sale and provided the new owners continue to pay the pitch fee in full and on time to the site owner.</p> <p>So how can a commission of 10 per cent of the equity of that home approx £18,000 to £20,000 be justified</p>
71			The overall appearance of the park has a significant affect on the value of a home.
72			None as far as I know. The value of park homes decreases with age and the pitch rent rises which to my mind acts in a negative way
73			The provision of a properly serviced and well maintained pitch on a fully licensed and well

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

		Response Percent	Response Total
	<p>maintained Park Home site is probably worth around 50% of the homes value. This is always reflected in the site owners charges for a new home when sold. The manufacturers standard charge for a new double standard home would be approximately £80 - £90K, and the site owner would expect to receive a discount on the published price, it will cost them around £8K to site, and depending on the location of the site expect to receive between £185,000 to £250,000 when sold.</p> <p>If they decide to sell the Park Home privately in time, they will also sell the right to station their home on the on that park site. So how can a commission of 10% of the equity (approx £18000 to £20000) be justified.</p>		
74	Do not know.		
75	our home cost [REDACTED] and [REDACTED] to site [REDACTED] years ago. we have the bill of sale if required.		
76	<p>I can't answer this, as like many other owners, our homes were bought directly from the Park Owners and already situated on a pitch, for which, all home owners pay a monthly pitch fee - in my case this is £[REDACTED] on th top of this everyone has their Council Tax to pay - which is in a contention on its own as there seems to be no set rules as to which band we pay. I was assessed as "C" grade, however I have recently heard that [REDACTED] new houses [REDACTED] have been graded as being "A" grades ? One of these houses is larger than mine and the other about the same size. Apparently in England all Park homes are "A" graded.</p> <p>When purchasing my home, I asked what I get for my monthly payment and was told it was purely for siteing the house on private land.</p>		
77	Depending on the attitude and/or behaviour of the site owner, it can be either/or beneficial/detrimental		
78	Not able to comment		
79	The provision of a an adequately sized, properly serviced, well maintained pitch on a fully licensed PH site is probably worth 50% of the park homes value. This is always reflected in the price that a site owner charges for that new home when it is sold to new residents of the park. If you decide to sell their Park Home privately in years to come there will be a written agreement on completion of the sale and provided the new owners continue to pay the pitch fee in full and on time to the site owner NOTHING HAS CHANGED. This being so how can a commission of 10% of the equity of a home be justified?		
80	<p>The provision of an adequately sized , property serviced and well maintained pitch on a fully licensed and well maintained Park Home site is probably worth 50% of that Park Homes value.This is always reflected in the price hat a Site owner charges for that new home when t is sold to new residents of the Park .The manufacturers standard charge for a modern double park Home would be approximately £80-£90 k and a Site Owner would expect to receive a discount on that published price . It will cost them around £8 k to site that home on their Park Home site and depending on the location of that site ; they will expect to receive between £185,000 to £250,000 for it whe it is sold . this selling price reflects the new owners right to their pitch on that Park .ths right is confirmed by the written agreement the site owner provides them with before they move into their new home and by paying a monthly pitch fee to the Site Owner.</p> <p>if they decide to sell their park home privately in the years to come they will also sell the right to station their home on that Park Home site .They will also transfer their written agreement to the new owners on completion of the sale and provided the new owners continue to pay the pitch fee in full and on time to the Site Owner</p> <p>NOTHING HAS CHANGED</p>		
81	A park home sold off site will be worth 2/3 less than sold on site. But we have never sold off site.		
82	I picked my park home as a result of the pitch and the surrounding area.		
83	there is value in being situated on a pitch, having services, a community, and a sense of permanence.		
84	If a park home is 12 months residential it obviously adds to the value		

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

		Response Percent	Response Total
85	Not sure, we have never had a park home agreement as is the case for many on this site so we are not even aware of our pitch size. Added value to a home on a pitch in a park depends greatly on the attitude of the Park owner. He can make the park as stable or unstable as he wishes to.		
86	we have to be on a site to get the value of our home.		
87	It is the pitch that makes a park home viable and usable, the day to day maintenance of that pitch is the responsibility of the home owner and the quality of that maintenance reflects upon the price that could be expected for the property		
88	n/a		
89	Don't understand the question.		
90	the increase that a park home goes up in value being put on a pitch is swallowed up by the extra payment taken by the site owner for putting it on site this amount can vary depending on the site by thousands of pounds		
91	none		
92	Nobody in their right mind would buy a park home without a pitch -- they are worth very little otherwise. The previous site owner here charged £7,000 for a pitch ■ years ago for "loss of profit" on a sale.		
93	None, a buyer buys the home not the pitch.		
94	I do not know.		
95	The landscaped surroundings of the pitch and park as a whole, increase the value of a home; as well as location.		
96	None		
97	Difficult to assess but the ever i creasing pitch fees would deter a lot of people for sure.		
98	None.Far better to own the plot of ground		
99	Without a pitch and its in-built mains services etc, the park home is only worth its structural value. Therefore, being sited on a pitch probably almost doubles its value.		
100	estimated 10%		
101	There is no evidence that being situated on a pitch add any value as Park Homes do not tend to increase in value as conventionally built homes.		
102	As the park homes is a rental pitch i cant see how this will increase value compared to a privately owned park home on its owners own site		
103	There seems to be a mark up of 150% + after being sited.		
104	A park owner will not let you buy your own home and put it on his site. You have to purchase through him and he will add about 50% to the manufacturers price		
105	This is a ridiculous question as without a pitch the park home has no value because without a		

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

		Response Percent	Response Total
	pitch it cannot be occupied.		
106	NA		
107	None.All park homes have to be on a site.		
108	Obviously unless you own your own piece of land it is essential to be able to site your home somewhere!		
109	None by the time we hAve taken commision off we have lost money on whatwe paid		
110	<p>The provision of an adequately sized, properly serviced and well maintained pitch on a fully licensed and well maintained Park Home site is probably worth 50% of that Park Home's value. This can be seen in the price that a Site Owner might charge for that new home when sold to new residents. The manufacturers' ex works charge for a modern double Park Home might be approximately £80-£90k and a Site Owner would expect to receive some discount on that price. It will then cost around £8,000 to site that home and depending on the location of that site; they would expect to receive between £185,000 to £250,000 for it when it is sold. This price reflects the new homeowner's right to station their home on that pitch on that Park. This right is confirmed by the Written Agreement the site owner provides before they move into their new home and also by virtue of paying a monthly pitch fee to the Site Owner.</p> <p>If they decide to sell their Park Home privately in the years to come they will also sell the right to station their home on that Park Home site. They will also transfer their Written Agreement to the new owner(s) on completion of the sale when it becomes the new home owner's responsibility to continue to pay the pitch fee in full and on time to the Site Owner.</p> <p>This being so how can a commission of 10% of the equity of that home (approx £18,000 to £20,000) be justified?</p>		
111	I do not have any figures, but the cost of a mobile home from a manufacturer can be compared with the same on a mobile home park		
112	None. A park home has its own intrinsic value based on its size, condition, age, etc. Without park homes situated on the park owner's site, he/she would have no income and therefore no business.		
113	Don't know		
114	Yes definitely adds value living on beautiful park site		
115	Depends where the pitch is situated! Easy accessibility is also a major factory Location is everything Sea views help to sell a home		
116	None. No pitch, no park home.		
117	Not sure about value, what I can tell you that the value of park homes devalue at an alarming rate., how ever the pith fees increase year on yea.. don't forget we also have to pay council tax, and whilst I don't mind that, what I object to is to forced to pay a higher council tax to live in a park home then when I did when a owned a house of bricks and mortar in [REDACTED] where I also live now, so no change of area) then I do now???? where's the value in this		
118	If you are lucky enough to have a large pitch which we personally have, the selling price is enhanced as I have stated		
119	Very few parks allow you to site your own caravan on their parks so without a plot you are stuck with a caravan and nowhere to put it so you have to sell to them for a 1/4 of what you paid		
120	A home can be purchased independently but no park owner will allow anyone to site that home		

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

		Response Percent	Response Total																																										
	on their land. They require the reduced prices of homes direct from the manufacturer and the siting fee - often several £thousands. The pitch is essential and a monthly pitch fee pays for this.																																												
121	If in the sense that you mean as opposed to a mobile home and freehold plot bought complete. I would personally prefer the latter to avoid paying ground rent. However, some residents would prefer the close community of others, a value that would be hard to calculate.																																												
122	Rent is paid on a pitch																																												
123	<p>There is no doubt that when a previously occupied home is sold 'sited' (ie. on the basis that the new occupiers will continue to occupy the home and pitch in the same manner as the predecessors) it adds considerable extra value to the home.</p> <p>The following re-sales statistics underline this point.</p> <p>*NB. The figures for unsited values in each instance have been taken from Glass' Guide – the recognised and widely used valuation guide for park home and caravan dealers. Sample of details for homes subject to commission sales, where Glass' Guide figures are available</p> <table border="1"> <thead> <tr> <th>Year of Manufacture</th> <th>Make</th> <th>Model</th> <th>Sited re-sale price achieved</th> <th>Glass' Guide Retail</th> <th>Glass' Guide Trade</th> </tr> </thead> <tbody> <tr> <td>1999</td> <td>Stately Albion</td> <td>Tredegar</td> <td>40000</td> <td>8150</td> <td>5300</td> </tr> <tr> <td>2003</td> <td>Stately Albion</td> <td>Tredegar</td> <td>53000</td> <td>9525</td> <td>6625</td> </tr> <tr> <td>2002</td> <td>Willerby</td> <td>Vogue Solitaire</td> <td>32500</td> <td>11700</td> <td>4875</td> </tr> <tr> <td>2001</td> <td>Atlas</td> <td>Super</td> <td>25000</td> <td>5700</td> <td>1125</td> </tr> <tr> <td>2003</td> <td>Homeseecker</td> <td>Langdale</td> <td>39000</td> <td>10855</td> <td>8200</td> </tr> <tr> <td>2001</td> <td>BK Bluebird</td> <td>Brookwood</td> <td>26000</td> <td>4075</td> <td>775</td> </tr> </tbody> </table>	Year of Manufacture	Make	Model	Sited re-sale price achieved	Glass' Guide Retail	Glass' Guide Trade	1999	Stately Albion	Tredegar	40000	8150	5300	2003	Stately Albion	Tredegar	53000	9525	6625	2002	Willerby	Vogue Solitaire	32500	11700	4875	2001	Atlas	Super	25000	5700	1125	2003	Homeseecker	Langdale	39000	10855	8200	2001	BK Bluebird	Brookwood	26000	4075	775		
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124	not known I bought mine S/H already on site																																												
125	There is some value to being on a pitch already as there is no need to spend time to locate a site, pay set up fees etc. However, 10% of the sale price seems excessive, even for this benefit. That's why a capped rate would be better, if the commission is retained.																																												
126	Difficult to assess, owners of park homes look after the pitch they are on. Maintenance and improvements are paid for by them in our experience.																																												
127	Being located on a fixed pitch gives the owner a feeling of permanency and subsequently motivates the owner to maintain the property and its surroundings. Any potential new owner is likely to be similarly motivated.																																												
		answered	127																																										
		skipped	48																																										

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	131
1	I think I have outlined the benefits above.		

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
2			
	Any reduction or, preferably abolition, would assist Park Home residents to achieve a realistic nett amount on sale and enable them to better afford to purchase another suitable property. Park Home Site owners do nothing to assist residents in selling their property and just wait for the commission to be paid to them.		
3			
	It will make living on a park home and being able to move around if necessary much more realistic.		
4			
	The Welsh sector will grow far quicker than the rest of U.K.despite the obvious pitfalls, this lifestyle will appeal to future generations wishing to downsize, in a recent conversation with a local solicitor, his opinion was that if the sector abolished/amended the 10% tax and with the Welsh Mobile Home Bill being far superior than the English Bill, sales would increase by 25%,good news for all businesses in Wales, including site owners and local licensing authorities, with increased revenue from council tax, people living illegally in holiday caravans paying no tax would be persuaded to adopt a legal lifestyle.		
5			
	The abolition of the 10% fee would make the private sale of the Park Home a more reliable and less tortuous experience. The homes will become more desirable and Park Home sites more valuable thus providing a direct monetary advantage to the site owners and the local economy		
6			
	Site owners will claim they will go out of business,so,if you are serious about this consultation, question 11 is the one factor which has never been explored, without this evidence this whole process will be yet another joke report.		
7			
	A potential reduction or abolition of the commission should also include non-residential park home owners.		
8			
	One consequence, which would amount to virtual blackmail, would be site owners threatening to close parks, thus trying to force councils to re-house residents and make the latter's houses almost worthless. Councils should call this bluff and either take over the running of the site or let the residents form a co-operative to do it. Though not a gipsy soothsayer, I would forecast a healthy profit either way.		
9			
	It would help the Welsh economy and the local authority by receiving extra income for the council tax plus more income for the park owners by selling more new homes		
10			
	The abolition of the commission charges will make the purchase of park homes more desirable. It is the major obstacle for residents attempting to sell their property. It would also enhance sales of new park homes when the purchasers don't have the thought of the charge hanging over their heads if they do decide to sell in the future.		
11			
	Since the new legislation was introduced in Wales park home owners here have a much better position than those residents in England we have better legislation here and if the 10% was abolished it would make the prospect even more attractive. The desirability of of Welsh park home sites and their being in parts of the country that has outstanding natural beauty should make the prospect of park home sales in Wales even more valuable to park owners, thereby improving the local economy and the local councils receiving more income via council tax. This should benefit all parties concerned t		
12			
	The abolition of the commission charges will make the purchase of park homes more desirable. It is the major obstacle for residents attempting to sell their property. It would also enhance sales of new park homes when the purchasers don't have the thought of the charge hanging over their heads if they do decide to sell in the future.		
13			
	Most tenants living on these sites are at retirement age or over and the value of there home if being sold is crucial to the well being as regards further homing.		
14			
	No one should have to pay 10% of the value of there property to someone how does nothing to earn it.		
15			
	I feel that the 10% charge is unnecessary they already have ground rent off us. The only time commission should be charged is if they sell the property for us.		

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
16	One consequence, which would amount to virtual blackmail, would be site owners threatening to close parks, thus trying to frighten councils that they would have to re-house residents and make the latter's homes almost worthless. Councils should call this bluff and either take over the running of sites or let the residents form a co-operative to do it. Though not a gipsy soothsayer, I would forecast a healthy profit either way.		
17	More people would buy park homes, if they know that they will not lose 10% of their income when they sell.		
18	Only a site owner can answer this question.		
19	THERE IS VERY LITTLE MORE TO SAY ON THIS MATTER ONLY THAT, THE 10% COMMISSION SHOULD BE ABOLISHED.		
20	See above.		
21	On a large park home site the consequences of abolition would be small as the pitch fees paid would cover the maintenance of the park and a profit to the owner but on a small park the pitch fees would not be sufficient to maintain the park and provide profit to the owner, in this case there is a danger of the park closing which would in turn impact on the local council to rehouse residents who would lose their homes.		
22	stated previously		
23	If this were abolished it would make park homes more attractive for people to buy knowing they are not going to lose money should they need to sell at a later date		
24	If this were abolished it would make park homes more attractive for people to buy knowing they are not going to lose money should they need to sell at a later date		
25	THERE IS VERY LITTLE MORE TO SAY ON THIS MATTER ONLY THAT, THE 10% COMMISSION SHOULD BE ABOLISHED.		
26	IF the park owners business needs this income stream then my previous comments would alleviate both problems. From experience when people buy a park home they do not know all the financial consequences. So if it became the norm to pay the park owner a fee for security of tenure then they would accept this far more readily than paying the home seller a fee for the site.		
27	As the site owner is being paid a weekly ground rent which is enough to run the site, they should not be allowed to profit again and again from the tenants from these sales		
28	Not known		
29	I have no evidence but have the following thoughts 1. A high risk of an increase in site fees and/or the purchase price of a home to residents 2. If residents pay less then, if needed, it would improve their options in future decisions ie if a care home is needed		
30	The abolition/reduction should attract even more potential buyers of park homes on sites across Wales. Those homes will become more desirable and Park Home sites more valuable, thus providing direct monetary benefits to Site Owners,		
31	YOU CAN LOSE A LOT OF MONEY IF YOU WERE TO SELL YOUR PARK HOME AS THEY LOSE VALUE WITHOUT PAYING OUT A PERCENTAGE TO THE PARK OWNER WHO IS MAKING GOOD MONEY OUT OF THIS AND DOES VERY LITTLE TO GET THIS PARK UP TO THE STANDARD IT SHOULD BE.		
32	The abolition of the commission would not have any consequences because the		

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
			monthly rent [pitch fee] +admin charge takes care of this which is reviewed every april in line with the A.P.R.[usually upwards].
33			They do nothing for it
34			To understand all consequences of the reduction or abolition of the commission you need to knock on doors around different parks so you can understand what is going on.
35			In our view the abolition of commission would make the buying and selling of park homes more viable to more people and given the current housing crisis the more accommodation available to meet people's needs the better
36			Reduction or abolition of the commission would allow residents the same freedom as homeowners of more conventional homes ,such as bricks and mortar, to be able to move on if their circumstances changed, without feeling financially trapped, as most do now. As I have put my life savings into my Park home, I would like to feel that if needed I could afford another home or pay for any care I may need in the future, without being a burden to the state.
37			The consequence will probably mean that ground rent goes up as the owner will want to recoup his losses
38			the pitch fees would be raised even less maintenance work would be carried out
39			There is no evidence to provide. The park owner does not earn more than one commission and that at the sale not every time it is sold. this is unadulterated robbery (the Sheriff of Nottingham tried this and was destroyed, or so it is said in folklore) but was this before the Magna Carta or after?
40			I do fear that the total abolishment of the commission will result in the reduction of residential park home sites and lead to an increase in the need for more social housing. However i have no evidence for this
41			As explained in my first paragraph
42			If we can abolish or reduce commission in line with estate agents fees then we would have a better chance of selling our homes! We were put off in purchasing because of this but couldn't afford a bungalow in the area as we need one level so had no choice! But currently you have to pay the estate agents fees up to 2% and also the 10% to the owners for doing NOTHING! its outrageous
43			i support the abolition of removing commission
44			Pitch fees would definitely go up and possibly site maintenance would suffer.
45			i think it is a disgrace to have to pay commission when you are paying ground rent for very little in return
46			As stated on Q2 we think a star rating would improve all aspects of Park Home Estates. Whilst the current accross-the-board commission rates apply, sites such as ours will continue to decline. Site owners should have to prove where this commission is being used, and should be made accountable for negligent practices.
47			N/A
48			As I said we feel the commission paid is not fair to residents we are pensioners and to lose 10% of your sale is a lot of money especially when you want to buy another dwelling.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
49			We believe it is morally wrong as we have looked after and maintained our homes to keep the value up, only for to have the owners to take 10% for doing nothing.
50			The park owner may realise that, unless the park is maintained, no-one will want to buy into this lifestyle. I suppose if it was abolished, the park owner would attempt to increase the pitch fee. Or else hike up the buying price of a new home. But then nobody would pay astronomical amounts for a property which devalues
51			I am not sure that there would be any legitimate evidence of consequences, given the overall accumulative ground rental monthly charges and possible benefits to the owners relating to negotiations for electricity and water supplies to all properties, rather than any individual arrangements as other property owners are able to negotiate.
52			the abolition of the 10% commission in wales added to the extra security and financial advantages afforded to Welsh Park Home residents by the superior Mobile Homes [Wales]Act 2013 makes a Park Home living in Wales a much better proposition than is currently offered on sites in England Properly marketed and non-withstanding that Welsh Park Home sites are often in beautiful parts of the country this will make it more attracted for potential buyers to buy a park home in Wales therefore providing more financial benefit to site owners the local economy and local council
53			The park owner would probably seek to increase the ground rent
54			A potential reduction or abolition of this charge would only affect the Park Owner by decreasing his profit margin slightly.
55			Reduction of the commission wouldn't make a great difference, in my mind because there is nothing spent on our park now, abolition of the commission I think he would try to put the ground rent up.
56			Site owners will complain that they are losing out but increased sales should mitigate this situation. Most home buyers are down sizing to stretch their resources especially now that life expectancy has become such a large factor. Any reduction in the price of park homes would encourage sales.
57			Makes it easier and quicker to sell a Park home. More profitable for the seller and as most Park Home Owners are over 50 years of age, this gives them more equity for their retirement. More funds available should they need money to have some enjoyment in later years or pay for health care. Less liable to need assistance from the state due to lack of funds.
58			reduction of the commission or even abolition would give the elderly residents better financial security and peace of mind if they ever needed to go into residential care or needed to move closer to relatives
59			We buy our homes, we pay ground rent which is increased each year, we get nothing in return except rules and the use of the pitch. Why should we keep our homes in good order, add value to them, look after the ground we rent, then have to pay owners commission when they also do nothing to help sell the property and charge a fee if you wish them to advertise your home. We have site managers who cut the grass and get professionals in for any other problems. They will do nothing to help the elderly residents in any way.
60			I have no idea.
61			There should be no consequences in the abolition or the commission as it goes to the owner and is not put back into the site.
62			A potential reduction or abolition of this commission would enable the Vendor to have at least a fighting chance of purchasing another home because at the moment it is almost impossible unless you have a vast amount of savings and can afford to take a considerable loss on your original investment.
63			We believe it should not make any difference to sites as the money incoming from

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
			sales of properties is unpredictable so how can site owners rely on this money. A more guaranteed income comes from site rent.
64			Easier to sell Residents more likely to maintain their homes to a high standard Residents more likely to make improvements to their homes Would eliminate paying commission to both an estate agent and the park owner when selling the property
65			The abolition of a commission charge on the sale of a home would allow people to move home if they required and not feel trapped because of this totally unfair amount they would need to pay on a sale of there home.
66			There should be no consequences to the site as the money is not put back into the site
67			The best consequence for removing the sales commission would be to remove park site owners from the whole equation, getting rid of this "get rich quick" scenario and have all sites managed properly, looking after residents rights and creating a safer environment for older people.
68			more attractive to buyers
69			The owners would have to accept that they no longer have a licence to print money !!
70			most obvious is the reduction in the park owners revenue, potential reduction in park maintenance and or increase in pitch fees
71			The homes would become more desirable , and park homes sites more valuable thus providing direct monetary benefits to site owners,
72			Any reduction in commission must not be accompanied by poorer standards of maintenance
73			The abolition of the 10% commission in Wales, added to the extra security and financial advantages afforded to Welsh Park Home residents by the superior Mobile Homes (Wales) act 2013 makes Park Home living in Wales a much better proposition than is offered in England. These homes will become more desirable and Park Home sites more valuable, thu providing direct monetary benefits to Site Owners, the local economy and the local authority.
74			As the park owner is in no way involved in the sale of park homes, I fail to see why they should be paid a commission on every sale of a park home.
75			it would make our homes easier to sell. enabling us to keep the only equity we have.
76			Again this question would be directed to the Site owners, as it seems obvious that it would be to my benefit if abolished, as should I be able to sell my property for the original asking price it would mean I would have to pay ████████, and should this property be resold, the owners would get a further 10%, and nobody can tell me what this payment is for - just that this is the agreed amount by law.
77			Reduction in asking price of used park homes enabling new buyers to afford them.
78			The average resale value would reduce making park homes more affordable without the existing owner suffering any loss through commission.
79			My main concern is where the site owner would look to 'fill the hole' left by the absence of income. also, if the commission fee is chargeable on a newly sited park home, then almost certainly the (regue) site owner would look at ways of using this feat to block

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
			sales of existing residents' park homes.
80			The only consequence I can see is fairness, that the person actually owning and paying for the upkeep and maintenance of Park Homes gets to keep all the money from selling it.
81			The abolition of the 10% commission in Wales, added to the extra security and financial advantages afforded to Welsh Park Home residents would be a much better proposition than is currently offered on sites in England. Welsh Park Home sites are mostly situated in beautiful scenic parts of the country so the abolition should attract more potential buyers, the homes will then become more desirable making Park Home sites more valuable, thus providing direct monetary benefits to Site Owners, local economy, and to the local authority by receiving a boost in Council Tax.
82			This being so how can a commission of 10% of the equity of that hoe (approx £18,000 to £20,000 be justified ?
83			We can only increase pitch fees by the CPI. Maintenance and repairs go up more than the CPI We do not have any service charges on our site to cover these costs. We would consider selling, abolishing sales commission wold also affect the value of the park, I would consider selling the land for building.
84			to owners it would mean we would retain the value we paid for our home and any improvements we make, bearing in mind that park homes decrease in value.
85			With the housing shortage it would possibly help lowering prices of units, and make them more attractive to 1t time buyers.
86			Please see our reply to question 2
87			as far as we are aware selling a park home is the only home that you have to pay a commission on selling. is this fair on park home owners
88			To recap, it is perceived that the park owner could support a successful business from the ground rental income with a significantly reduced commission.
89			n/a
90			Nothing serious.
91			the consequences of the abolition of the commission to any residents on site would be nothing because nothing changes when commission is paid. but to the site owner it would be dramatic because he or she would have less free money to spend lets not forget the site owner gets rent every month off every resident to run the site and make improvements if they want to.
92			money paid for nothing in return
93			Tales of woe, disaster and catastrophe will no doubt be forthcoming from site owners. The truth will out if they submit genuine accounts as requested, then any consequences can be assessed.
94			I bought my park home from [REDACTED] because it was all I could afford ([REDACTED]), I have spent approximately [REDACTED] in improvements internal and external, I did not have to spend this amount especially on the outside of the property but I wanted to have a nice garden and improve the appearance, [REDACTED] do nothing with regards to making the park more attractive as they are only interested in "Cutting The Grass" it's the amount of work that residents put into the park that makes it attractive. If the [REDACTED] that I have spent is for my benefit then so be it, but at this particular time if

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
	I was to market my property it would have to go on at £[REDACTED] just for me to break even, [REDACTED] do nothing for their right to charge 10% commission, they are the most disagreeable company I have ever come across, I believe that they do not want "Old" happy residents as happy residents equals £0.00 on the bottom line of their balance sheet, if the abolition of the 10% were to come into affect [REDACTED] may just soften their attitude to the "Customers" that keep them in business.		
95	I do not know. It would depend on how invested in the site and its upkeep the owner was.		
96	It is clear to me that beneficial developments to the park will be substantially reduced in quality and value, and the initial price of a home will increase to the detriment of many buyers who will typically be downsizing hoping for more affordable housing combined with a community focussed lifestyle. The 10% commission payments were introduced for that reason and we should not lose sight of this important fact which has a considerable impact on cash flow and the business value of a park owner. If the business remains viable then residents will likely be bettered catered for by park owners.		
97	No work has been carried out on this site for the last 5 years, although we had been promised new road surfaces, markings and adequate lighting.		
98	10% is ridiculous. If commission must be payed then 2 1/2% is the very most which would be acceptable.		
99	Better people than myself need to understand and answer this matter.		
100	We paid £130.000 for our Park Home [REDACTED] years ago.It has been well maintained.We have been trying to se.ll the property for [REDACTED] years.Despite reducing the price to [REDACTED] we are still unable to sell.If and when we do sell our Park Owner will take [REDACTED].On top of this our Estate Agent will take 2%, leaving us with the grand total of £102.000.What a terrible investment.Why should the Park Owner get that amount of money for doing absolutely nothing		
101	A reduction in the current commission from a maximum of 10% to 5% should not, in our opinion and based on the previous resales on this Park have any great consequences to our current pitch fees. Particularly if our comments in para2 are taken note of?		
102	Giving away 10% of the retail price of the park home could restrict the seller from moving on, the profit in park homes is not a great as houses, I bought mine for £32000 in [REDACTED], I paid nearly £10000 for the pitch and siting fees and currently pay [REDACTED] per 4 weeks in ground rent. The current value of my park home is [REDACTED] if I paid [REDACTED] to the site owner I would leave with a profit (?) of [REDACTED], that does not take into consideration the other costs spent such as decking and storage units and on top of the there are Estate Agents fees to be considered.		
103	cant see how reducing or removing the commission can impact the site owner.		
104	Concerned if contract is changed the park owner then may be able to increase lease, to recoup monies lost in commission.		
105	If the 10% commission received by the park homes was directly used by the site owner to invest in the overall quality of the park, then I would see a reason for the charge, but the current system just appears to give the park owner extra income upon a property being sold, without having to put any effort into it. This I believe to be unjust as the seller of the property not only has to pay seller fees to estate agents but then also a fee to the park owner, making the overall cost of selling the property higher than 10%, for this reason alone the fee is unjust as the park owner gets income without input.		
106	As the commission is such a small part of the overall income, the only consequence is to the seller.		

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
107			See answer 2
108			NA
109			Commission abolition would enable all park homes to be bought/sold at their correct value. At this site no homes change hands in some years. therefore the site must be able to be operated viably on the sites rents alone.
110			No idea.
111			Can't see any only that owner could be awkward when you sell as it is not in his interest of he gets nothing out of it.
112			As most residents are OAPs if this was ABOLISHED it would make all residents happier in the knowledge that their Next of Kin would not be saddled with this liability when they passed away.
113			The abolition of the 10% commission added to the extra security and financial advantages afforded to Welsh Park Home residents by the superior Mobile Homes (Wales) Act 2013, makes Park Home living in Wales a proposition that is superior to that currently offered on sites in England. Properly marketed, and given that Welsh Parks are often in scenically beautiful areas of the country, this abolition should attract even more potential buyers of Park Homes to sites across Wales. Those homes will become more desirable and Park Home sites more valuable, thus providing direct monetary benefits to Site Owners, the local economy and to the local authority by their receiving a boost in Council Tax from formerly less populated areas of the country.
114			1. An increase in the number of park homes available to buy at affordable prices and improving the housing market. 2. Removal of the current incentive for unscrupulous park owners to prey on vulnerable residents. 3. Increased options for residents to find more suitable accommodation based on their current needs.
115			It is possible site owners will try to recover what they consider they have 'lost', and thereby try to penalise residents financially in other ways, which needs to be guarded against. They will consider it a 'loss' because they have been so lucky to have had it for so long. But they can always sell the site. Allow the gates to open for other potential site owners who are not so obsessed with money.
116			Pitch fees could rise.
117			I /we wouldn't have as much opposition if only some of our monies were spent on upgrading the Park, i.e. re-laying the roads which are in a poor state in places. The owners receive a substantial amount of money in ground rent so this is boosted quite heavily if a property changes hands a couple of times in a year.
118			The ground rent would increase for everyone I suspect Services like garden maintenance (grass cutting) would become chargeable Water supply is currently included in our ground rent but this may become a separate cost
119			Reducing or abolishing the commission is likely to result in an increase in pitch fees.
120			in 2013 the Welsh Gov brought out the New Mobile Homes act wales, this Act was put inn place to protect us against unscrupulous land owners,, up to now we have had no support from this new act, many solicitors have no idea we have even gone to the WAG direct but with no avail. We on the park are a group of semi and retired persons fighting a battle for our rights against a multi millionaire. All we want is what we are

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

		Response Percent	Response Total
			entitled too. but we have filed to find someone to protect us. there are regular breaches of MS2008 on the park which the local authority fails to address..
121			I don't think they will abolish it to be honest, and our park owner is very nice and helpful. If you can manage without an estate agent too.
122			The parks make it extremely difficult and costly to resell, leaving the only option to sell at rock bottom price back to the park which they then sell on at at least one third more than they bought it off you for
123			In the case of real hardship it allows a seller to at least receive a %of what they paid I have seen desperate owners selling £40000 vans for £10000 or nearest offer with ██████ taking 15% of that .
124			The abolition of "Commission" would attract more residents for the reasons stated in 6 and 8 above. This would create further expansion in the industry. ██████ who has transport difficulties, is anxious to move closer to the hospital where he is receiving treatment. When he has paid the 10% charge, he does not have enough money to purchase a new property of any sort. It seems unfair that taxpayers indirectly fund the charge. Many residents receive state and council tax benefits which in effect are used to pay the charge.
125			With regard to the Park Home Commission charge, I wish to bring into question the legality of this commission charge imposed upon residents who have bought and paid for their own homes. There is no effective work done by Site owners in the transaction between the seller and purchaser other than a change of resident name, for which the Site owners can gain a commission profit of between £4,000 and £20,000. However, in the case of abolition, Site owners would not hesitate to raise the ground rent, this would put up the living cost of those poor pensioners like myself, who at least have the choice to remain on site, therefore to avoid commission charges.
126			Homes can be sold many times over and the commission is pocketed by the site owner
127			The reduction/abolition of commission, coupled with stringent control on pitch fee reviews (which must be in line with CPI) will make it increasingly difficult for us to bridge the growing financial gap – particularly as costs will no doubt increase as the park infrastructure ages. We've already discussed the possibility of selling the park (as we felt daunted by some of the changes being introduced by the WG via the Mobile Homes (Wales) Act 2013. However, we've strong emotional ties with the park and many of its residents (we've known many for a decade plus.) We were encouraged by our daughter to 'stick with it' and see whether the impact of the Act turned out to be less problematic than we feared. When we conversed with suitably placed property agents at that time, we were told that some of their multi-park clients were looking to sell off their Welsh parks and invest the money in further parks in England instead, as a direct result of the WG's proposals. We will certainly consider selling the park if the commission rate is reduced/abolished - although we question how strong the market will be... who will look to take on parks when people like us (who set up the park, have run it for ██████ years, and have a strong emotional tie/sense of responsibility to it) are looking to bail out. If we sell the park it is doubtful that we'll invest any proceeds into further business enterprises here in Wales. Were we to try and sell the park, but fail to find a purchaser – or find that nobody in the next generation of our family was prepared to run it - we would have to investigate the process by which we might close the park.
128			not known
129			Buyers of park homes will be on a level playing field, as the price of a home with the current 10% may mean some cannot afford the home and the fee. If it were abolished, some park home owners may "claw back" that money in other ways, which would be unfair, particularly on sites where rent is paid.
130			If the commission were reduced or abolished, it would ease the burden on the seller or

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

			Response Percent	Response Total
		their family, however the site owner may compensate by raising ground rents, which may deter a buyer.		
131		The main consequence of the possible reduction or abolition of the commission would be that owners will feel that 'fair play' has been established between themselves and the park owner. Any feelings of being 'exploited' by park owners, who in effect benefit from the efforts of owners to maintain and improve their own properties, would cease. The natural process of selling a home to a new buyer would go ahead without any of the complications of the present 10% commission rate having to be considered.		
			answered	131
			skipped	44

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government? If so, please provide the preferred method to contact you to discuss any such arrangements.

			Response Percent	Response Total
1	Open-Ended Question		100.00%	92
1		Not known - potential tenant.		
2		Obviously I am not a park home owner, but without verified inland revenue accounts, covering all owners parks in Wales, this consultation will be the same as previous reports, a total whitewash.		
3		NA		
4		Every other business in the U.K.has certified accounts, what sensible reason could you give for hiding your inland revenue figures from the Welsh Assembly Ministers, only one, you never thought the day would come when you were put in the position you are now		
5		Not applicable		
6		NA		
7		N/A		
8		N/A		
9		N/A		
10		na		
11		N/A		
12		Only a site owner can answer this question.		
13		N/A		
14		N/A		

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government? If so, please provide the preferred method to contact you to discuss any such arrangements.

			Response Percent	Response Total
15		N/A		
16		N/A		
17		N A		
18		I am a Park Home owner not a PARK OWNER		
19		N/a		
20		N/A		
21		Not a owner		
22		Not a Park Owner		
23		N/A		
24		N/A		
25		N/A as I am not a park owner.		
26		n/a		
27		? be interesting if you can get that!		
28		not owner		
29		N/A		
30		N/A		
31		N/a		
32		N/A		
33		N/A		
34		N/A		
35		I'm not a park owner.		
36		N/A		

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government? If so, please provide the preferred method to contact you to discuss any such arrangements.

		Response Percent	Response Total
37	No		
38	N/A		
39	N/A		
40	N/A		
41	N/A		
42	No		
43	not a park owner		
44	N/A		
45	not a park owner		
46			
47	n/a		
48	N/A		
49	I am a park resident.		
50	don't have this information.		
51	Not applicable to me.		
52	N/A		
53	<p>the abolition of the 10% commission in wales , added to the extra security and financial advantages afforded to Welsh park Home residents by the superior mobile Homes (wales) act 2013 makes Park Home living in Wales a much better proposition than is currently offered on sites in England.</p> <p>Property markeed and non -withstanding that Welsh Park home sites are often in scenically beautiful reas of the country , this abolition should attract even more potential buyers of Park Homes to sites across Wales</p> <p>those homes will become more desirable and Park Home sites more valuable , thus providing direct monetary benefits to Site owners , the local economy and to the local authority by their receiving a boost in Council Tax from often less populated areas of the nation ,</p>		
54	<p>Yes but only if confidential.</p> 		
55	N/A		

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government? If so, please provide the preferred method to contact you to discuss any such arrangements.

		Response Percent	Response Total
56	n/a		
57	N/A		
58	n/a		
59	N/A		
60	N / A		
61	n/a		
62	NA		
63	if i were the park owner i would be pleased to show any accounts required.		
64	not a park owner		
65	Not applicable		
66	Good luck in getting the information that you require for this question.		
67	N/A		
68	N/a		
69	N/A		
70	Not applicable		
71	I am not in the lucrative position of being a Park Owner .		
72	Not applicable.		
73	N/A		
74	not a park owner		
75	Not privy to this information.		
76	H/A		
77	NA		
78	I am not the owner but this site is run by a ltd., company so accounts should be available. In any case the licensing authority should have the right to examine accounts		

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government? If so, please provide the preferred method to contact you to discuss any such arrangements.

		Response Percent	Response Total
	of any park home or touring site.		
79	!!! does this mean owners don't have to disclose their income from park home sites to anyone other than to income revenue dept?		
80	Not applicable.		
81	not applicable		
82	N/A		
83	I don't think in a million years the park owner will share his amounts with you, he failed to share effective and correct accounts with the latest RPT with his own management team unable to provide the name of their employer....(This is clearly documented in the RPT)		
84	I am not the owner		
85	N/A		
86	For the Site owner to answer.		
87	Not applicable		
88	<p>[REDACTED]</p> <p>We're happy to share detailed information with WG.</p> <p>[REDACTED]</p> <p>[REDACTED]</p>		
89	N/A		
90	N/A		
91	N/A		
92	Not applicable.		
		answered	92
		skipped	83

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	106
1		Very little.	
2		Not known - potential tenant.	
3		Many congratulations to all Welsh Assembly Ministers in having the foresight to adopt radical policies, which are the envy of the rest of the United Kingdom, we residents, feel reassured by your actions, regarding in particular the Fit and Proper Test to deter the criminal element, and removing site owners from the sales process, please complete the package by freeing us from this Unfair, Unjust and totally unnecessary monetary burden.	
4		The superiority of the Welsh Mobile homes act over its English counterpart is well known. The abolition of this charge will add to its reputation and the Welsh governments reputation in looking after its population. The residents of the English Park Homes are making strenuous efforts to upgrade their mobile homes act to bring it up to the standard of ours.	
5		A superbly written document, all credit to the Welsh ministerial team led by Perter Black for producing a bill which is the envy, of the rest of the country, the final hurdle to make Wales the only place to purchase a mobile home, is to please,please,please rid us of this disgusting charge.	
6		No impact as our park is non-residential	
7		Don't know, but residents have much better protection from rogue site owners and managers.	
8		It has made Welsh park home residence feel secure	
9		Increasing the pitch fee by the CPI instead of the RPI is fair, just and appreciated. The park owner not being able to pass on the cost of the site licence to residents is also much appreciated. The "fit and proper person" speaks for itself. these were items that our association at [REDACTED] Park suggested to Peter Black prior to the legislation being adopted.	
10		We in Wales have led the way with superior legislation and it follows that if the 10% commission charge were to be abolished in Wales England may also decide to follow suit thereby benefiting all park home residents across the country. We are very proud that our Welsh Government has listened to the concerns of park home residents and taken decisions that make park home living in Wales a much better proposition . The English "powers that be" are following in Wales' wake and it is for the Ministers concerned to listen to park home owners concerns and address them to bring about a fair conclusion.	
11		Increasing the pitch fee by the CPI instead of the RPI is fair, just and appreciated. The park owner not being able to pass on the cost of the site licence to residents is also much appreciated. The "fit and proper person" speaks for itself. these were items that our association at [REDACTED] Park suggested to Peter Black prior to the legislation being adopted.	
12		na	
13		Don't know, but residents have much better protection from rogue site owners and managers.	
14		it has stopped the site owner raising the fees each year to suit themselves. now that it is raised according to government set rates each year.	
15		Only a site owner can answer this question.	

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

		Response Percent	Response Total
16			
	we are not talking about MOBILE HOMES; our site and the homes are STATIC HOMES. [we have not been informed otherwise. ????????		
17			
	As a resident, it is comforting to know that the law is aware of you at last, and on your side to some extent.		
18			
	On my particular park they are ineffectual as the park owner refuses to abide by any rules. Evidence of this can be obtained from Mr [REDACTED] or [REDACTED] council as we have been keeping him informed of events on the park and there seems to be no system in place to uphold the the Mobile Homes act.		
19			
	From our point of view it protect us by the owner having to have a licence and be a fit and honest person and having to bide by local council regulations.		
20			
	From our point of view it protect us by the owner having to have a licence and be a fit and honest person and having to bide by local council regulations.		
21			
	we are not talking about MOBILE HOMES; our site and the homes are STATIC HOMES. [we have not been informed otherwise. ????????		
22			
	Speaking as an owner much more certainty on the financial side of pitch fees and more security going forward		
23			
	None on this site		
24			
	Don't know		
25			
	The superiority of the Welsh Mobile Homes Act over its English counterpart is well known and is recognised by Park Home residents on both sides of the border.		
26			
	This has helped a great deal.		
27			
	N a		
28			
	None again come and have a look around the Park.		
29			
	Unclear		
30			
	Has gone some way to protecting the Park home resident , but feel there is still more work to do, mainly to give residents the same rights as conventional home owners.		
31			
	Cannot comment		
32			
	from a residents viewpoint i think this is a good thing, when i recently bought my home, it was the homes act that made me feel more confident and secure about owning a park home		
33			
	Not known		
34			
	It has increased awareness of the legal and moral obligations of both park owners and park owners to good effect.		
35			
	As a purchaser, I believe I am very well protected. Removal of commissions would increase the risk of quality of life being deteriorated.		
36			
	don` t know		

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

		Response Percent	Response Total
37			N/A
38			none
39			As we have more rights it makes us feel more secure and safer.
40			The Act was introduced to protect residents from bad park owners. However, after two Tribunals (one of which our QRA won) we are still vulnerable as Tribunals have not got the powers to enforce their decisions
41			On the park where I have lived for 20 years people can now advertise their used park homes for sale without having to go through the office. Local Estate Agents now advertise park home properties on this site routinely. This helps the vendor sell their property. There also seems to be a fairer system relating to such matters such as hedge and fence heights, existing landscaping, trees, sheds, pathways etc.. that were in place prior to the Mobile Homes (Wales) Act 2013 and occupiers cannot now be made to change such existing features to their home.
42			the 2013 Welsh Mobile Home act is being recognised by Park Owners on both side of the border in Wales we have the fit and proper person provision that our pitch fees can only increased by the CPI inflation index and the charge by the local authority for the site license cannot be added to our pitch fees are some of the benefits
43			None
44			It has eased home owners fears about some of the injustices that had occurred on some unscrupulous parks before the act was introduced and curbed some of the actions of the few dodgy Park Owners who operated at the time.
45			I think its had a great impact to all Park Home owners.
46			Have not seen any difference.
47			It has meant that park owners are now liable by law and have to comply with this, thus giving more protection to Park Home owners on their land.
48			N/A to me
49			I have no idea.
50			It has helped the residents.
51			It has allowed the Local Authority to make sure a fit and proper person is given a Park Licence thereby giving the Residents peace of mind. Also properties can be sold without the consent of the Park Owner.
52			We would not have bought a Park Home if the mobile Homes Act was not in place, we feel the Act does give Park Home Owners more rights. We read the Act before we bought our home.
53			All heading in the right direction weeding out the crooks which are in the industry.
54			Don't know
55			no evidence

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

		Response Percent	Response Total
56	Greatly, It has improved the Park Owners lot considerably. A good many of these site owners are totally unscrupulous in their ways. Far too many in my view. They need to be held to account. The original idea of these homes for retirement is perfect, the reality is somewhat different !!		
57	not sure of the impact it has had, but, we have seen a big increase in demand for park homes. The evidence as indicated by the manufactures of park homes as manufacturing and delivery dates have in most cases extended to twelve months, even a new manufacture on the scene has delivery dates of four months		
58	Park home owners have greater confidence in their rights and understanding of park rules etc.		
59	The superiority of the Welsh act over it's English counterpart is well recognised on both sides of the Border. In Wales we have a Fit and Proper Person provision, our pitch fees can only be increased by the CPI inflation index, and the charge by a local authority for the sites licence cannot be added to the Pitch Fees, are some of the advantages. These benefits are missing from the English Mobile Homes act.		
60	Do not know.		
61	cleared up some very muddy rules. we now have rights that were not there before.		
62	I have no idea.		
63	Huge...people who wouldn't have bothered selling up have done so. Our site owner has almost taken a back seat...there's far less bullying and intimidation. In fact there's a definite improvement in the 'atmosphere' of the park. And the local Estate Agents are willing to take on sales.		
64	Increased our costs.		
65	N/A		
66	More paperwork, more expense in time and administration for no gain for either park owners or home owners. Pitch fee reviews now requires, a pitch fee review form approx 12 pages and a covering letter, where a one page letter did the same job.		
67	Unknown as I am a relatively new resident.		
68	none that we are aware of.		
69	Not known.		
70	We can only comment on our own site, as residents here we feel that the act has given us some support but have yet to see any real evidence of change in the way the site is run.		
71	don't know		
72	Have not seen any changes as a result of the act.		
73	n/a		

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

		Response Percent	Response Total
74			NA
75			the mobile homes act is the most important legislation to any resident because yhe one important point is they canno"t be thown off site for any undue reason.which then gives peace of mind .
76			don't know
77			Has stopped much sale blocking by unscrupulous site owners -- but not all -- as it has to be proved. On this site, potential buyers are only shown second hand homes for sale owned by the site owner: others are not mentioned. Many elderly residents are still unaware of their rights under the Act, but it has also stopped new site rules being imposed at the drop of a hat.
78			It was a great stride forward in protecting the rights of people that live in Residential Park Homes, but it now has to go the extra mile with the abolition of this 10% commission to protect an ageing population which live in these kind of properties.
79			I believe there is more support and clarity for park home owners.
80			As a buyer myself in 2016, the act gave me the confidence to invest in a park home, allowing me to retire in wonderful surroundings and with neighbours with a similar outlook in life.
81			Nothing has been done on this site
82			Not an issue that I have ever heard being discussed on this site.
83			It has stopped sale blocking by the Park Owner
84			An overhaul of the previous Act was overdue and should have included a review of the commission rate at that time. The main changes that have personally affected us to date are; 1. A new set of Park rules have been instituted with all residents invited to take part in the consultation process. 2. We no longer need the Park owners permission to whom we resell our home to - provided the buyer fits the category to live on the Park i.e. is within the age group stipulated in the Park rules.
85			Legislation stopping site owners from illegal charges for goods or supplies such as utilities which site owners can no longer profiteer on, insisting that goods such as LPG, Insurance are bought only from set suppliers and having to comply with CRI in regards to rent increases.
86			not been living in the park home long enough to see many changes
87			This has given Park Home owners protection against unreasonable park owners and enabled us to challenge decisions made that are not in our interests.
88			The park owners now must follow the rules, and can not make up reasons to purchase owners homes at vastly reduced prices.
89			NA
90			None, to the best of my knowledge.except that it did put an end to sale blocking by the site owner.
91			?

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

		Response Percent	Response Total
92			Much better as you can sell to whoever you want providing they meet criterior
93			At this Park it has not been felt, as nothing has changed [REDACTED] the Park owner [REDACTED] will not provide written reasons for the site rent increase or given the 28 days notice, also no Park Rules have been given, it is also unknown if the Park has reregistered.
94			<p>The superiority of the Welsh Mobile Homes Act over its English counterpart is well known and is recognised by Park Home residents on both sides of the border. For example, in Wales we have the "fit and proper person" provision (albeit only for Site Managers and not Owners); our pitch fees can only be increased by the CPI index and the charge by a local authority for a site's license cannot be added to our pitch fees. These benefits are missing from the English Mobile Homes Act and currently strenuous efforts are being made by English Park Home residents, supported by a number of their MPs, to upgrade their Mobile Homes Act to bring it up to the level of its Welsh counterpart.</p> <p>For example:</p> <p>GOVERNMENT CALL FOR EVIDENCE You have until the 27th May to take part in this consultation and a copy of the document is available at: https://www.gov.uk/government/consultations/review-of-park-homes-legislation-call-for-evidence</p> <p>This latest English consultation has now closed, but currently the above link remains open.</p>
95			<p>As the majority of home owners are on a state pension, which increases by the CPI, the change by the Welsh government of the annual pith fee from RPI has a cumulative benefit to the resident.</p> <p>Whilst we on this site have a good site owner, Banning of sale blocking and the scrutiny of site owners, has improved the lives of many.</p>
96			Don't know
97			In my opinion, the Act has had a beneficial impact by clarifying and improving the conditions and rules under which park home sites are managed.
98			Asked and answered in question 10. No one knows how to clearly translate the Act, so unable to enforce. there has been no president set so nothing to work to or against. many of the statements are ambiguous so can be manipulated by barristers
99			We are very grateful we have a superior Act to England. It is weeding out unscrupulous park owners which makes life so much happier for residents. The introduction of CPI rather than RPI increases is much fairer as is the park owner's payment of the site licence as it is an integral part of a their business.
100			For the site Owner to answer.
101			It has helped to make some site owners be more responsible
102			<p>Impact so far re: Mobile Homes (Wales) Act 2013</p> <ul style="list-style-type: none"> • Increased workload & costs:- <ul style="list-style-type: none"> o Site Rules consultation ♣ £1680 Solicitors' costs ♣ 40 hours office time, 1 person ♣ Generation & Circulation of circa 780 A4 pages of documentation (20 A4 pages per home) o Fit & Proper Persons Licence (to be repeated periodically) • £2251 A fee

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

		Response Percent	Response Total
103			
104			
105			
106			
		answered	106
		skipped	69

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	111
1			
2			
3			
4			
5			
6			
7			
8			
9			

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

		Response Percent	Response Total
10			I do not believe that proposed changes to the commission rate will have any noticeable effects on the Welsh language but see answers to question 14 for what could be a more positive outcome.
11			Unable to offer any opinion.
12			none
13			Don't see why any changes should have any effect on the Welsh language.
14			no views
15			None whatsoever, how on earth can this be relevant to the issue in hand?
16			Unable to answer this question.
17			not really involved on the welsh speaking side, we are english speaking anyway, so no comment.
18			I live on a site in a non-Welsh-speaking part of Wales, and I suspect that many of the residents are incomers to Wales. However, I think it is difficult to speculate as to whether the existence of such sites or the way they are organised has any impact on the use of Welsh. The site owner is English, and based in England, and that might be relevant.
19			I don't see how the commission rate has any bearing on which language used. All schools in Wales should teach Welsh.
20			not really involved on the welsh speaking side, we are english speaking anyway, so no comment.
21			What effect has the commission rate to do with the Welsh language
22			Why would there be any effects
23			I believe these changes would have no effects on the Welsh language
24			None at all
25			None
26			Those that can and wish to speak Welsh should be respected by any organisation in Wales and have bi-lingual literature and if necessary available translators
27			I don't think it would have an effect one way or another.
28			Don't speak welsh so have no idea
29			i think more local people would buy park homes as home to live in and work in the area, rather than retire to one and come from away I am such a person, welsh speaking, and work locally and not yet ready to retire

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

		Response Percent	Response Total
30			
	I cannot see any difference in what any of the proposed changes would make. Welsh and English are used as is necessary and Welsh is spoken no less favourably than English, nor should it be, we are all one people in a free country.		
31			
	I do not have sufficient knowledge to comment, except to say, if my site is typical of the region [REDACTED] then the absence of any Welsh people in the area let alone Welsh speakers must have an adverse effect on the use of the Welsh language. A large proportion of (park home) residents are English who have moved to the area on retirement for the wonderful seaside location.		
32			
	None that we can think of		
33			
	none		
34			
	Depends where the head office is situated.		
35			
	not effected do not speak welsh		
36			
	Not sure.		
37			
	None at all in South Wales as most people cannot speak Welsh anyway.		
38			
	I have personally never seen any advertisements for Park Homes in the medium of Welsh, therefore any positive change would be potentially beneficial.		
39			
	I believe these changes will have no noticeable effects on the Welsh language		
40			
	On the site I live on none at all to the Welsh language		
41			
	I don't think that the abolition of this charge would have any direct effect on the Welsh language. (But see next answer)		
42			
	I don't think it would have any effects at all even the last four park owners didn't or couldn't speak Welsh.		
43			
	The only way that positive effects could be increased is if more Welsh families bought park homes. The site I live on has only [REDACTED] Welsh families [REDACTED] out of [REDACTED] homes. Given that house prices in Wales are generally lower than in England any reduction in the initial price is to be welcomed.		
44			
	By abolishing the 10% commission rate, it would allow Welsh Speakers to buy Mobile Homes within Wales, as it would reduce the overall costs. I have lived in Wales most of my life and in my retirement I chose to to buy a Park Home within my home County.		
45			
	I believe that some residents who move to Wales have made efforts to learn some of the Welsh language. The Welsh often do not use their own language, so I am not sure how this would make a difference if the commission rate was changed. I do not feel this is relevant.		
46			
	There should be no effects		
47			
	I do not think it would have any effect.		
48			
	Both languages should be equal as we get hospital, Council tax forms etc. in both		

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

		Response Percent	Response Total
	languages already.		
49	<p>We don't believe this would have much effect, maybe more people from the local areas in Wales might buy Park Homes as abolishing the commission may make the homes more affordable and less of a risk of loosing money on the home making it impossible for people to move.</p> <p>We have moved from England to Wales and are learning the Welsh language, continued help and courses for people to learn Welsh has more impact.</p>		
50	There shouldn't be any effects as long as the same information is available in Welsh and English.		
51	We believe especially on our park it would have a positive effect many people on our park are learning to speak Welsh.		
52	Won't have any effect		
53	dont think it would affect it		
54	I can see no change either of benefit nor non benefit.		
55	N/A		
56	as an English man I am doing my best to learn the Welsh language along with a number of neighbours		
57	Is this question relivant to this consultation?		
58	i ho		
59	Wouldn't have thought it would have any significant affect		
60	These changes will have no noticeable effects on the Welsh Language.		
61	Do not know.		
62	would make no difference.		
63	Can't see how this is relevant. Whatever language is spoken by owners of site or home owners should not be an issue.		
64	I really don't understand why this question has been raised.		
65	Unable to comment		
66	I believe these changes will have no noticeable effects on the Welsh language.		
67	the superiority of the Welsh Mobile Homes act over its English counterpart is well known and is recognised by Park home residents on both sides of the border For example in wales we have the "fit and proper person " provision our pitch fees can only be increased by the CBI inflation index and the charge by a local authority for a		

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

		Response Percent	Response Total
	sites licence cannot be added to our pitch fees are some of the advantages These benefits are missing from the English Park Homes act and currently strenuous efforts are being made by English Park Home residents , supported by a number of MP s , to upgrade their Mobile Homes act to bring it up to the level of its welsh equivalent.		
68	Makes no difference in whatever language, the language is not relevant to the matter.		
69	Unknown		
70	cant think of any.		
71	No view.		
72	Cannot see any connection myself.		
73	Could someone please explain the relevance of this question?		
74	don't know		
75	Do not foresee any impact, either positive or negative, towards the use of the Welsh language		
76	n/a		
77	None whatsoever.		
78	if the commission were to to be abolished in wales it would encourage more people to come to live here and so they would encourage there children to speak the welsh language.		
79	both language should be treated the same		
80	In my opinion, there is no reason whatsoever for this question to be asked. Why should a commission rate change have any effect on the Welsh language?		
81	I cannot in truth answer this part.		
82	I do not understand what if anything would change regarding Welsh language.		
83	I cannot see how any change in commission rate will impact on the use of the Welsh language. In fact as a person retired to Wales from England I enrolled with the university and continue to attend Welsh language classes to learn and integrate into my new country. That is however irrelevant in this survey.		
84	Don't know		
85	Da iawn.		
86	Not a welsh speaker but I cannot see any impact on the welsh language		

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

		Response Percent	Response Total
87			I really cant see the relevance of this question
88			No obvious effects from any proposed changes.
89			None
90			None
91			There is no reason why this should effect, and do not understand the reason why the question has been asked.
92			I think the loss of upwards of £8000 is a disgrace in Welsh or English. All of my park home friends are English speaking, so I do not feel qualified to express an opinion on this subject.
93			NA
94			As a non Welsh speaker I would think that any change in the commission rate would have no effect at all on either the Welsh or English language.
95			I am not Welsh but have been learning welsh for the last 3 years. I would like more people to care about learning the language but cannot see how any proposed changes would have any affect on the Welsh language especially here in [REDACTED]
96			None
97			None at all, except that some Residenrs might want all notices to be in Welsh, as we do not get any written notices it does not effect us
98			We do not consider that the proposed changes would have any detrimental effect on the Welsh Language.
99			I regret that I am not qualified to give a view
100			Sorry, do not understand the relevance of this question.
101			None
102			No views on this subject.
103			None what so ever, the residents on this park never seen a penny of the commission, it like our pitch fees goes directly to the park owner ,, in relation to welsh language, like all documents today ,,,,,,,, all documents need to be available in different fonts, braille, languages to meet the anti discriminatory laws of today..... give people options as at the bottom of each official document.....Perhaps one should ask why bring in a new WELSH Act when no-one is fighting for the very Act that was made to protect us, we feel we have no-one on our side looking out to ensure we are not being exploited,
104			I do not think there would be any negative effects. More Welsh speaking residents may be encouraged to move to park home living if the economics were more favourable. Several of our residents sing in the local choir and have enjoyed learning songs and hymns in Welsh for many concerts including The Royal Albert Hall.

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

		Response Percent	Response Total
105	We fail to see a connection between commission charge and the Welsh Language. On this site there are ■ homes and probably only about 2 or 3 that are actually Welsh!!		
106	Have no views. I am not qualified to answer		
107	Q13 Effects of proposed changes on Welsh Language. Our park is currently owned and operated by a Welsh family – two of whom are Welsh speakers.		
108	not known		
109	Welsh is not widely spoken at my park - most residents are from all over the uk - and there are a huge number of holidaymakers. I struggle to see how a change to the commission would have any impact on the Welsh language.		
110	N/A		
111	I can't see that any changes would have any impact on the Welsh language.		
		answered	111
		skipped	64

14. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	96
1	As above		
2	It should improve the economy and so retain more people who might otherwise leave the area, which dilutes the use of the Welsh language.		
3	As my previous reply indicated, retired people require to keep their minds active, and what could be more rewarding than learning how to converse in a nations language.		
4	Possibly with the increased influx of English people retiring to live on Welsh park home sites this could have a positive influence on the Welsh language. A number of these do learn the Welsh language especially in Welsh speaking areas		
5	I believe it should be abolished		
6	It is very clear, do you want the industry to stagnate and die, or do you have the foresight by abolishing the 10% tax, to, as I have stated in 13, encourage additional people to come and live in Wales, enjoy our culture and rich heritage, from north to south, this land of song will welcome you.		

14. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

		Response Percent	Response Total
7			See previous answer
8			No need to change the proposed policy. In my view, it wouldn't have the slightest effect on the Welsh language.
9			Since we moved to [REDACTED] we have made friends and mixed with a lot of Welsh people we are beginning to learn the Welsh language which is a challenge . People from the park are involved with many local activities, green bowling, dolphin watch, lifeboats, retirement club
10			The area where this park is situated is not a Welsh speaking area and although we understand your concern, whatever decision you make on the commission charges we honestly do not think it would mean any change.
11			I don't think that the language opportunities count for much in this area as it is an English speaking area. However, there are a number of English residents on this park that are making the effort to learn the Welsh language and it follows that more residents may show an interest in learning, also elderly Welsh speakers who wish to "downsize" may find the park home way of life more attractive if the 10% charge were to be abolished.
12			The area where this park is situated is not a Welsh speaking area and although we understand your concern, whatever decision you make on the commission charges we honestly do not think it would mean any change.
13			There are great opportunities for people moving into park homes in Wales to learn at the very least a smattering of Welsh, and on smaller and rural sites to use the language to communicate effectively -- and to learn all about Welsh traditions and customs. Such incomers would also help to offset the drift of young people to the cities and contribute to keeping Welsh thriving and vibrant.
14			Not relevant.
15			I cannot see any connection between this question and this consultation. I live in an English only part of Wales.
16			i do not wish to get involved in either welsh or english language politics.??????
17			See above.
18			I don't see the relevance to this question
19			i do not wish to get involved in either welsh or english language politics.??????
20			This has nothing to do with the welsh language. This is about the 10% commission paid to site owners
21			I don't understand why it would have an effect
22			As above
23			Abolish it
24			What has this got to do with the getting rid of the 10% commission

14. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

		Response Percent	Response Total
25	As above		
26	Cannot comment		
27	like I said above really more local working people,		
28	What a load of gobbeldygook. This is Wales and everyone here is treated the same way so why should anyone speaking either English or Welsh be treated differently? So their are no adverse effects either way. Whoever asked that question needs treatment.		
29	I do not have sufficient knowledge to comment, my own opinion is that there would no effect on the present usage of the Welsh language.		
30	The maximum the owners should get on a sale of a park home should be max of 2% in line with estate agents. The homes decline more rapidly than brick built homes so harder to sell as they get older and also some look like very old [REDACTED] caravans on site so ruin the look overall and just looks like a old caravan park. Not the [REDACTED] residential Park! Very Little is done onsite to make the look more appealing. A very old hump in road still waiting to be sorted and still waiting for water pressure to be sorted Its been [REDACTED] years! No gardening etc. Mostly just interested in making new pitches for money making for new vans to be put in! told no money to sort out the [REDACTED] [REDACTED]		
31	i can't understand what effects this will have		
32	N/A		
33	n/a		
34	Not sure.		
35	As above		
36	although there a lot of retired English people living on our park they will become in contact with the local Welsh speaking residents and will want to learn to speak the Welsh language and there are plenty of places giving lessons		
37	I can't see it having any effect unless more Welsh speaking buyers were encouraged to buy park homes if the charge was removed.		
38	Sorry I can not explain.		
39	As point 13. Only an increase in Welsh to English occupancy is likely to have an effect. This is at the risk of making sites less attractive to other nationalities from a language point of view. Any other propositions are likely to be devisive. I am not aware that the Welsh language is treated any less favourably than English here [REDACTED]. More often the reverse.		
40	N/A		

14. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

		Response Percent	Response Total
41			This is a matter of personal choice and I feel that the Welsh people mainly choose to speak English. I cannot see how this proposed policy will make any changes to that
42			I have no idea.
43			I do not know.
44			see above.
45			There shouldn't need to be any changes as long as the same information is available in Welsh and English.
46			Don't know
47			would have no effect
48			I see no reason why any such changes would impact on the Welsh language
49			The above is not really relevant, the welsh language will be spoken by the Welsh, the English (some) will try to speak the language
50			As above
51			As Q13
52			Further to my answer to Q13, I do believe that there may be a possible positive side effect on the use of the Language, should more retired English people decide to relocate to Welsh Park Home Sites, as they are certain to come into frequent contact with the Welsh Language, and may decide they wish to learn same.
53			Cannot answer to this.
54			don't understand this question.
55			See previous answer - plus Welsh speakers should be able to request as relevant forms in Welsh.
56			I live in mid Wales and took a Welsh Language Course at the local college. I passed and received a certificate but found that no one (not even the locals born and bred) are in interested in speaking Welsh. As the saying goes, 'Use it or lose it' and I lost it.
57			Unable to comment
58			I believe these changes will have no noticeable effects on the welsh language
59			No suggestions , not relevant
60			Unknown
61			no comment

14. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

		Response Percent	Response Total
62	No view.		
63	Ditto.		
64	Could someone please explain the relevance of this question?		
65	don't know		
66	Some of the residents on our park are actively learning the Welsh language as a means of integrating further into the Welsh culture		
67	no coment		
68	What ??????????		
69	i would rather see a 1% levy be put on all homes sold on residential sites provided the site owners commission is abolished this levy can be used for the education of promoting the wesh language.		
70	don't know		
71	This is civil service gobbledegook and should not be a part of the submission		
72	I cannot in truth answer this part.		
73	Again, unsure what is meant by this.		
74	Not applicable;e.		
75	Don't know		
76	As Above		
77	No obvious requirement to change.		
78	None		
79	There is no reason why this should effect, and do not understand the reason why the question has been asked.		
80	see above		
81	NA		
82	See Q12		

14. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

		Response Percent	Response Total
83	?		
84	None		
85	<p>Further to our answer to the previous question, we do believe that there may conceivably be a positive effect on the use of the Welsh language.</p> <p>Should more retired English people become residents on Welsh parks, they are certain to come into contact with the Welsh language, more than they ever would in their English homes.</p> <p>As already happens in areas of English immigration in Wales, many new residents will wish to learn something about the language of their new home area. The provision of Welsh lessons in or around the locations of their Parks would surely "have increased positive effects on opportunities for people to use the Welsh language".</p>		
86	I suppose that it could be argued that Welsh speakers could insist that that the relevant document be available in the Welsh language		
87	See above.		
88	Not sure		
89	No comments to make.		
90	Asked and answered number 13.		
91	Cannot		
92	<p>How could proposed policy be formulated/changed to increase positive effects on Welsh language</p> <p>Reduce likelihood of Welsh owners selling up, and park being purchased non-Welsh speakers.</p>		
93	not known		
94	No opinion		
95	N/A		
96	I can't see that this would have any effect on using the Welsh language.		
		answered	96
		skipped	79

15. If you have any related issues which we have not specifically addressed, please use this space to report them.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	63
1			None.
2			I understand you will be bombarded with extreme views from both sides, however, with inflation on 3% our monthly pitch fee increase will far exceed our basic pension allowance, year on year, if this trend continues, park home living will become unsustainable, pensioners will be forced into social housing, with all the associated cost to the already under pressure tax payers, we do not require charity or handouts, please therefore release us all from this financial burden.
3			Wales has always been a nation who lead from the front, please don't bow down to big business pressure, and fail us pensioners. Dioich yn fawr.
4			This questionnaire is mostly aimed at the Park owners and the majority of questions cannot be answered by Park home owners.
5			Park Homes Commission Rate changes should include non-residential park home owners as well as resident.
6			Park home operators are well known for operating through a myriad of companies, so it will be easy for them to submit details of a park showing it to be in the red when this is not the true case. As has been shown by the lack of financial information supplied to you by site owners, it will be extremely difficult to get an honest reflection of the viability of the industry in Wales. The subsidiary company which operates our site, for instance, is [REDACTED]
7			The park homes do not increase in prices the same as brick and mortar so having 10% of your selling price taken off you, will limit your movement if you require to move through ill health
8			I would like to know how Park Owners set the asking price for refurbished homes, I bought a refurbished home on asking the the Park Owner how old it was he said he didn't know, it took me [REDACTED] years to find out it was [REDACTED] years old, recently a refurbished home very similar to mine was sold on the Park I live on [REDACTED] less than I paid for my home.
9			Park home site owners are well known for operating through a myriad of companies, so it will be easy for them to submit accounts from a park showing it to be in the red when this not true. As has already been shown by the lack of financial information supplied by site owners, it will be extremely difficult to get an honest reflection of the viability of the industry in Wales. The holding company which operates our site through a subsidiary, for instance, [REDACTED]
10			I have been told that many years ago the commission rate was a lot higher and has been reduced twice already, and has had no adverse effect on park home owners.
11			No other issues.
12			i do hope all opinions will be addressed with consideration and respect whether the 10 % commission will be abolished or reduced, i hope we will be kept informed on the matter.
13			Our owner make a lot if money from site fees which he is supposed to use for Maintaining and improving the site. We do not see much evidence of this happening so do not see why he should get the commission when it's the home owner who arranges the sale.
14			i do hope all opinions will be addressed with consideration and respect whether the 10 % commission will be abolished or reduced, i hope we will be kept informed on the matter.
15			council tax bands are on value that homes are bought, even though we do not own the ground and the rents increase by the cpi every year without fail homes reduce in value

15. If you have any related issues which we have not specifically addressed, please use this space to report them.

		Response Percent	Response Total
			not gain but council still value the price that was paid initially.our home is band C which unsited is above the value of the property!
16			N a
17			All Park Owners should be made to justify the amount they receive and be transparent.
18			None
19			just the fact that my site is not well maintained, and we are all worried about the height of trees and we see no maintenance or value to our pitch fees as a collective or understand how our pitch fees are spent, we pay the money but see no results or improvements
20			No related issues. All we ask for is justice against a group of Park owners who will continue to try to extract `blood from a stone` twice over. What sort of justice is that?
21			Nothing to add.
22			Quiet park with lovely neighbours is the benefit. Will have to try to sell one day and they take too long with too much money of 10% plus estate agents fees that puts many many people off!
23			None
24			Please see question 12 above
25			Again, I do not know any Welsh speaking Park Home owners.
26			we hope that this will be the start of the 10% being abolished
27			The only issues I have is that some not all owners are greedy and controllers we`ve had good ones and right bad ones.
28			█ years ago when my wife and I contemplated moving to Wales we knew that, █ we would need to find a park home at the right price. we looked long and hard and eventually found one where we live now. However this 10% issue now means that we are now effectively unable to move again, if we should wish to do so. Over the last █ years we have noticed that many park home owners on other sites in the local area have had to wait years before being able to sell up and move on.
29			N/A
30			TEST
31			none
32			We like many Park owners are currently in dispute with our site owner. This particular owner refuses to obey the law and just goes on her merry way !! Councils seem reluctant to intervene in these matters. They make the rules ,then turn blind eye when they are ignored
33			I wish to give you another example of how park home owners use their elderly and vulnerable residents to revenue generate in a criminal manner. Owner of my park home █

15. If you have any related issues which we have not specifically addressed, please use this space to report them.

		Response Percent	Response Total
	<p>[REDACTED]</p> <p>succeed in ripping off [REDACTED] to the tune of £2k profit, in cash.</p> <p>[REDACTED]</p> <p>Why in the world would the government legislate to reward these [REDACTED] any more money from vulnerable victims at the end of their lives by sanctioning this ridiculous percentage from re-sold park homes? Makes no sense. These people do not need any more unearned money. Have you seen the cars they drive? The [REDACTED] who owns my site drives a vehicle that cost more than my park home and vehicle combined.</p>		
34	I have when I purchased my park home negotiated a 7.5% commission on the resale of my home		
35	Hopefully this bill will go through as our park homes loses money with time and 10 percent is a lot of money as park owner has had Grown Rent for the years we have lived on the park		
36	Along with many other fellow Welsh campaigners against the 10% charge, I wish to Applauded the Cabinet Secretary Carl Sargeant for having the courage to challenge the report. If the tone of this consultaion is an indicator, then I am encouraged that at last our many years of challenging that unfair and unjust 10% commission charge will at last be vindicated		
37	N/A		
38	I would like to point out that since buying my park home, I have spent several thousand pounds that would add to the value of my home [REDACTED]. I spent nearly [REDACTED] to have it landscaped and a patio laid, plus another [REDACTED] to erect a shed, plus the cost of an electric point. I have also had the outside of the home repainted to maintain it in good order - [REDACTED] - again at my expense. All this should help me sell my home,if kept in good order and then the more I get the higher the 10% !		
39	further to my answer to 13 above i do believe that there may be a possible side effect on the use of the Welsh language .Should more retired English people become Park Home residents on Welsh Park sites they are certain to come into frequent contact with the Welsh language , certainly much more than they have experienced in their former English Homes .as happens in areas of English migration in north wales , a number of these residents will welsh to learn something about the language of their new home area		
40	Abolishing commission on sales will devalue our business and in turn park homes, as sites will become run down. We have been thinking of remortgaging to reinvest in other business, this will affect the		

15. If you have any related issues which we have not specifically addressed, please use this space to report them.

		Response Percent	Response Total
			value of our business and may in turn affect our chances of expanding our business.
41			N/A
42			we have invested our retirement money in our home in order to leave something to our children, the commission would reduce the amount they would receive and this is not fair, the park owners have already received a large commission when we bought our park home and we pay site fees monthly. Site maintenance fees are very low we all look after our homes and gardens and there are no common areas they maintain.
43			New licences were issued to the Park Owners when the new legislation came in to force, is anyone checking to see that the Park Owners are complying with the terms of their licence agreements?
44			None
45			None
46			none
47			Please thoroughly investigate the veracity of any accounts submitted by site owners. It is normal practice for them to have a host of companies run by relatives or family and for assets and liabilities to be transferred between them so that true profits are disguised
48			I believe that the commission should be left as is. That is the term of the contract I signed and accept, notwithstanding any subsequent reduction would ultimately benefit a sale value
49			Improve the sites appearance and we only have 1 person covering 5 sites and our site always seems to be left out of improvements.
50			Each site is different and my site is friendly and inclusive of requests for work to be done etc. I am sure this is not the case for all.
51			Bearing in mind that a good percentage of Park Home residents are elderly, we feel that this survey and its complicated format would be off putting, thus resulting in a 'cannot be bothered attitude'. This of course will result in a reduced response, which of course will work to the Park Owners favour.
52			We hope that full cooperation is given by Park owners and residents alike to arrive at an agreed, sensible decision in respect the commission rate. In no other sector of the housing industry is a home owner required to hand over any commission to a land owner during a resale of their own property. Though not part of the remit of the survey, park home owners also pay, in addition to a pitch fee, council tax. The pitch fee covers costs for roads and lighting plus other infrastructure upkeep. The only service we receive from the Council is waste collection. We appear to be paying twice for roads & lighting etc! Perhaps this also needs to be reviewed asap?
53			I would like to know why in Wales some 90% of park homes are placed in Band C for Community Charge purposes, when in England (where property prices are generally higher) 90% of park homes are in Band A.
54			I can see this survey is not for ordinary tenants. We have no evidence except for our own eyes and seeing how new homes are being crammed into the most unlikely places to know that the commission is the over-riding factor in managing a park home site. If you look at staffing levels you will see that sales staff far outway maintenance staff. Thank you anyway for taking the time to read this.
55			When I bought my park home the owner [REDACTED]. After paying the park owner commission she did not have enough to purchase another home and had to go back to renting.

15. If you have any related issues which we have not specifically addressed, please use this space to report them.

		Response Percent	Response Total
56			
57			
58			
59			
60			
61			

This was an unfair move backwards, and could have been prevented.

See Q7

As I am now over 70 and on pension credit with no savings I do worry about any increase in site fees as already one weeks money per month goes in site fees. That means a quarter of my income. And for what? Even our so called fire safety equipment is badly maintained. However there is nowhere we can go to get help.

As we have shown in our responses above, the park home industry seems to be populated by [REDACTED] operators who are deliberately blind to authority. Attempting to obtain accurate financial details is virtually impossible; even Government Regulators find it so. We have evidence that our park owner has salted away some of his income into [REDACTED] probably to avoid tax. Such LLPs were once described by David Hartnett (a former head of HMRC) as "scams for scumbags" which says it all. In the unlikely event that a park owner such as ours might present 'accounts' as being true and accurate, we would urge caution in assessing these. We have tried to show in our responses that many legal loopholes remain which impede fair play for residents. Despite the Welsh Government's attempts to improve the lot of park residents, for which we are all extremely grateful, it will never be possible to effectively regulate an industry which is governed by enactments which are enshrined in weak civil law, which give no opportunity for the average park dweller to obtain any meaningful degree of retribution for wrongdoing. We wish to extend our grateful thanks to Cabinet Secretary Carl Sargeant and his staff both for their time to read our responses and for their involvement in this further attempt to improve and clarify what is a complex and obscure area of housing legislation.

The cost of park homes has risen dramatically over recent years and a 10% commission on a modern home can be a considerable amount. Park owners offer no significantly improved services to reflect the increased value of commission received. If the commission is retained then it should be at a significantly reduced maximum rate such as 3%. The use of this income by the park owner should also be made transparent to park residents, for instance how much is used for improvements to/maintenance of the park. Whilst the commission charge continues, the temptation will always remain for the financially lucrative, unlawful bullying of vulnerable residents as continually experienced on the site in which I reside.

Home owners do not pay commission, when they purchase bricks and mortar, Housing associations do not charge a commission rate for tenants to move on Private landlords don't charge a commission rate to private tenants even Local Councils who still have housing don't charge a commission rate so why are park owners ?? is that in its self some what discriminatory???

- The WG Preface to the Consultation Document alludes to park homes being, "an attractive, suitable and economically viable housing option... for some people it can be a 'lifestyle' choice.' It also speculates that, "for those who are thinking that they may need to go into sheltered accommodation or residential/nursing care, the loss of 10% from the sale price of their park home may impact on what options are available to them."

Many of our residents are elderly or infirm, or move onto the park later in life with a view to prolonging their independent living. Several have become widowed, and continue residing with us. They're reassured by additional protection of park rules, regulating neighbours' behaviour, and are comforted by the close-knit environment, and the fact that they can contact the park owners (who live adjacent to the park) in times of need. The homes are well suited for those with limited mobility.... once ramps into the homes are constructed, everything is modern and on one level. Homes can be adapted to accommodate specific mobility issues.

[REDACTED] This lady is choosing park living as an alternative to sheltered accommodation. Her family has modified her home to accommodate her limited mobility. She and her family are of the view that in doing so

15. If you have any related issues which we have not specifically addressed, please use this space to report them.

	Response Percent	Response Total
<p>they are:-</p> <ul style="list-style-type: none"> • prolonging her opportunity for independent living • securing her finances in the longer term – as the costs of living in sheltered accommodation are high, and non-recoverable, with no asset to sell off at the end. <p>Another [redacted] resident [redacted]. She's choosing park living as an alternative to sheltered accommodation.</p> <p>It's a lifestyle choice for many older people to downsize to all-on-one-level accommodation with neighbours nearby, minimal maintenance, limited overheads...sometimes releasing capital for holiday homes, caravan/camper van holiday lifestyles or second-home lifestyles. [redacted] of our residents own holiday properties abroad, and spend several months each year holidaying outside UK.</p> <p>[redacted] He's chosen park living because he fears being financially over-stretched trying to buy 'bricks and mortar,' but finds the security of tenure appealing. He stated that the low pitch fees and running costs will enable him to regain his financial footing over time. He's choosing park living as an alternative to long term private rental.</p> <ul style="list-style-type: none"> • Historic contractual provision. <p>There's always been commission – our [redacted] year old park was set up (and the land given over to residential use as a park) upon this basis. Any change in the commission rate derails the economic basis upon which the park was originally set up, and has been developed over decades.</p> <p>The contractual provisions regarding commission have been freely and openly agreed between park owners and residents (it's significant that the relationship has been regulated by statute for decades.) To now suggest that this should be changed is inherently unfair – and gives no incentive or encouragement to park owners to improve standards or enhance a sense of community. It should be noted that some park owners have chosen this style of business as part of their own (semi) retirement/pension plan/portfolio.</p> <p>All residents who move onto the park do so in full knowledge that the commission is applied. Many recognise it as being fair, given their long term security of tenure, and the enhanced value that a re-sold home enjoys because it is sited on a park (enjoying all amenities.) The benefit of the 'enhanced value' seems to increase with the age of the home.</p> <ul style="list-style-type: none"> • Repeated scrutiny of the legislation governing parks is creating uneasiness amongst park owners regarding the continuing viability of this style of business. In some cases it is possibly undermining the relationship between park owners and residents... park owners feeling resentful that they are being asked to provide the same/more, for less incentive and greater work/responsibility, and residents beginning to wonder whether they should be questioning fairness re: commissions, when they had not done so previously. • Pitch fee is currently low and affordable... it is perfectly possible for someone with a limited cash sum (eg. 40,000 obtained following breakdown of relationship and sale of matrimonial home and splitting of assets) to own their own home and be able to comfortably meet monthly pitch fees of £[redacted], Band A Council Tax, and cover the usual monthly outgoings...and still retain the prospect of selling their home in the future, thereby realising a deposit with which to purchase bricks and mortar property (should they choose to.) In such situations that person may then steadily regain their financial footing. It's likely that if commission rates are reduced/abolished, and pitch fees consequently increased, such a person' would be more inclined to enter the rental sector (where there is greater uncertainty) and their lump sum would gradually be lost altogether on rental costs of £400+ per month – and they would never return to home ownership again. This would also have a negative impact on the marketability of re-sale homes... by significantly shrinking the market. 		
62		Charges levied against residents at every opportunity (1) Rent increase of £[redacted] for

15. If you have any related issues which we have not specifically addressed, please use this space to report them.

			Response Percent	Response Total
		reading the electric meter and raising invoices when resale electricity was banned instead of approx [REDACTED] service charge (2) [REDACTED] homes to pay for cleaning out a neglected [REDACTED]		
63		Nothing further to add.		
			answered	63
			skipped	112

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

I am a Park Home resident who with my wife [REDACTED] has owned our PH [REDACTED]
[REDACTED].

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

BE ABOLISHED.

This iniquitous charge goes back to the 1960's. It was originally set at 25% and mainly applied to the sale of older static caravans. These were not worth very much money and were often assisted in being sold by the private individuals/families that owned these caravan sites at that time.

During the following 50 years these static caravans were replaced by modern Park Homes which are worth significantly more money, £180,000+ on many sites.

Over the following years the commission rate was reduced 3 times, until 1983 when it was set at a MAXIMUM rate of 10%, a rate that has been charged almost universally by most Site Owners ever since.

Site owners have given the 10% commission various names over the past years in a vain attempt to justify it. It has been called "A Site Transfer Fee" "A Park Exit Fee" "A Tripartite Payment Scheme" etc and is currently being called "A Deferred Pitch Fee" (see the recent PACEC report).

The Mobile Homes (Wales) Act 2013 removed Site Owners from the private sales of Park Homes. They can no longer claim that this 10% commission is for their "assistance" with a resident's private sale of their homes so it has now become obsolete,

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

**It is IMPOSSIBLE to forecast how many Park Homes will be sold privately on a PH site in any one year (Para 7.12 PACEC report).
Operators representatives stated that based on previous trading experiences they were able to forecast average sales (para 7.12 again).
The PACEC report clearly states how long PH residents have lived/intend to live in their Park Home (Paras 6.5 & 6.6) so how can they depend on this income source?
Based on these figures no sensible business man would ever depend on the 10% commission as being a reliable portion of their overall income.**

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

**It is IMPOSSIBLE to forecast how often commission will be received.
On our Park there have been no private sales for the past █ years.
I believe this to be the case on most other well run Parks, as residents normally only sell their Park Homes when a major change in their personal circumstances occurs e.g. serious illness, infirmity, death of a spouse etc
(PACEC report paras 6.18 & 6.19).**

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I cannot honestly answer this question.

Based on personal observations, viewing various TV programmes most recently being CH4's "How Do You Get So Rich" and previously CH5's "Million Pound Motors", plus reading numerous articles in national newspapers, I became aware that our site owner, alongside a number of other Site Owners, lead very extravagant lifestyles.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The sale of new Park Homes, the income from Pitch Fees, the (illegal?) profits from the "Recharge of Utilities" and that EXTRAORDINARY high income from 10% commission (PACEC Figure 5:2 page 37) are cited as the major sources of a Site Owners income.

However in the next paragraph (5.14 page 37) it is stated that a "slight disparity emerges". When operators were interviewed they "identified the sales of new units as a more prominent source of revenue than was indicated by the survey findings".

Prior to 1983 the commission rate was reduced from 25% to 10% without any resulting LEGAL increase in pitch fees and I cannot find any evidence that this caused the failure of numbers of Park Home sites.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

By making sure that people wish to purchase their new Park Home on a friendly, well maintained Park Home site.

By providing a Park Home site that existing residents are proud to call their home and one which they will happily promote as a worthwhile place on which you really want to live out your retirement in quiet enjoyment.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

This would very much depend on the character of the potential purchasers. If they are of strong and confident personalities, people to whom you can explain the vagaries of living on a Park Home site and how owning your home on another person's land is different from conventional bricks and mortar homes, you should have no serious problems.

However if they are of a slightly nervous disposition, perhaps people who are more happy with conventional living and who are made nervous by finding out about rules that they previously knew nothing about, you will probably have some difficulty in selling them your home.

These personal observations are from my experiences of assisting close neighbours in the sales of their Park Homes.

It is my belief that the abolition of that unjust 10% commission in Wales will confine these problems to the realms of history.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The provision of an adequately sized, properly serviced and well maintained pitch on a fully licensed and well maintained Park Home site is probably worth 50% of that Park Home's value. This is always reflected in the price that a Site Owner charges for that new home when it sold to new residents of that Park. The manufacturers standard charge for a modern double Park Home would be approximately £80-£90k and a Site Owner would expect to receive a discount on that published price. It will cost them around £8k to site that home on their Park Home site and depending on the location of that site; they will expect to receive between £185,000 to £250,000 for it when it is sold. This selling price reflects the new owner's right to their pitch on that Park. This right is confirmed by the written agreement the site owner provides them with before they move into their new home and by their paying a monthly pitch fee to the Site Owner.

If they decide to sell their Park Home privately in the years to come they will also sell the right to station their home on that Park Home site. They will also transfer their written agreement to the new owners on completion of the sale and provided the new owners continue to pay the pitch fee in full and on time to the Site Owner **NOTHING HAS CHANGED.**

This being so how can a commission of 10% of the equity of that home (approx £18,000 to £20,000) be justified?

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition of the 10% commission in Wales, added to the extra security and financial advantages afforded to Welsh Park Home residents by the superior Mobile Homes (Wales) Act 2013 makes Park Home living in Wales a much better proposition than is currently offered on sites in England. Properly marketed and non-withstanding that Welsh Park Home sites are often in scenically beautiful areas of the country, this abolition should attract even more potential buyers of Park Homes to sites across Wales. Those homes will become more desirable and Park Home sites more valuable, thus providing direct monetary benefits to Site Owners, the local economy and to the local authority by their receiving a boost in Council Tax from often less populated areas of the nation,

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The superiority of the Welsh Mobile Homes Act over its English counterpart is well known and is recognised by Park Home residents on both sides of the border.

For example in Wales we have the "fit and proper person" provision, our pitch fees can only be increased by the CPI inflation index and the charge by a local authority for a site's license cannot be added to our pitch fees are some of these advantages.

These benefits are missing from the English Mobile Homes Act and currently strenuous efforts are being made by English Park Home residents, supported by a number of their M.P's, to up-grade their Mobile Homes Act to bring it up to the level of its Welsh equivalent.

For example;

GOVERNMENT CALL FOR EVIDENCE

You have until the 27th May to take part in this consultation and a copy of the document is available at: <https://www.gov.uk/government/consultations/review-of-park-homes-legislation-call-for-evidence>

This latest English consultation has now closed, but currently the above link remains open for your information.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I believe these changes will have no noticeable effects on the Welsh language

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Further to my answer to 13 above I do however believe that there may be a possible positive side effect on the use of the Welsh language. Should more retired English people become Park Home residents on Welsh Park Home sites they are certain to come into frequent contact with the Welsh language, certainly much more than they have experienced in their former English homes. As happens in areas of English immigration here in [REDACTED] Wales, a number of these new residents will wish to learn something about the language of their new home area. The provision of Welsh speaking/singing lessons in or around the locations of their Park Home sites would surely “have positive effects or increased positive effects on opportunities for people to use the Welsh language”.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I have frequently referred to that flawed PACEC report in my answers within this consultation.

Along with many other fellow Welsh campaigners against the 10% I was elated when I heard that a consultation into “Understanding the Economics of the Park Home Industry in Wales” was to be undertaken. Sadly the PACEC report did not live up to my expectations. Its officials were unable to amass a sufficient amount of reliable financial data, particularly concerning Site Owners business and monetary records, to ensure their report provided the level of economic understanding of the Welsh Park Home Industry they were commissioned to provide.

Cabinet Secretary Carl Sargeant is to be applauded for having the courage to challenge what at first appears to be a detailed and authoritative report. If the tone of this consultation is an indicator then I am encouraged that at last our many years of challenging that unfair and unjust 10% commission charge will at last be vindicated.

Diolch yn fawr.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[]

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C: A park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

c. Be abolished

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

How would a resident now that sort of thing?

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Our park owner is not one of the best (the residents have all wondered how he got a 'right and proper persons' licence) and I know for a fact that in the past, he has made life hell for residents and bullied them off the park and then, to add insult to injury, the resident have to give him 10% of their sale price. [REDACTED]

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Refer to question 3

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I personally, do not see how anybody can bring a variable such as 'X amount of people are going to sell their homes this year' into a sustainable business plan? You would require either a crystal ball or a more devious solution ...

Prior to 1983 the commission rate was reduced from 25% to 10% without any resulting LEGAL increase in pitch fees and I cannot find any evidence that this caused the failure of numbers of Park Home sites.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Also I know of no other home owner, that if the property is leased, they have to pay commission to the land owner when selling their property, why the thought of it would send the 'leasing' property market into melt down !
Due to the fact that there is no way you can improve your lot !
The bottom line is that most 'park home owners' can not afford to sell their own property... So, There is no way, you can all your own home an asset !

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The manufacturer's standard charge for a modern double Park Home would be approximately £80-£110k and a Site Owner would expect to receive a discount on that published price of between 10-12%. Site that home on their Park Home site and depending on the location of that site, they will expect to receive between £185,000 to £250,000 for it when it is sold.

Our site owner has replaced about [REDACTED] units in the past [REDACTED] years.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Ans: question 4

Our park owner is not one of the best (the residents have all wondered how he got a 'right and proper persons' licence) and I know for a fact that in the past, he has made life hell for residents and bullied them off the park and then, to add insult to injury, the resident have to give him 10% of their sale price. [REDACTED]

I think it would make our residents feel a lot more secure! Removing the monetary gain from getting the residents to leave the park.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Ha !!

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

On our site.. NONE !!

The owner will still not allow us a residents committee (and please don't tell me he can't stop us because with threats and intimidation, he stops us)!

We did try to set up a residents committee a couple of years ago and we are the only residents left that were on the committee.

[REDACTED] (who like most residents is elderly and frail) was bullied [REDACTED] the council, [REDACTED] gave [REDACTED] a council bungalow.

Regardless, this very same council issued a 'right and proper persons' license for our owner (go figure).. So again to answer your question NONE !

I reiterate, (the residents still wonder how he got a 'fit and proper persons' licence)

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I do not believe these changes will have no noticeable effects on the Welsh language

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on

opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Idea

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I refer you to question number 12.

████████████████████ we to thought about selling up.
After spending/wasting £1000 on an estate agent, we came to the conclusion that we simply could not afford to do so because of the 10% commission. So here we still are at the mercy of the site owner (██████████).. We have ██████████ under our property and reported it weeks ago, explaining that it is a health hazard but nothing has been done about it.

We pretty much for a laugh, requested some trees be trimmed back that are dramatically restricting the natural light into our home.....Nothing!

There are other residents on this site who are having horrendous problems and stress due to this man and yet, ██████████ council still saw fit to issue him with a 'right and proper persons licence'

Any questions about our site owner could be directed to ██████████
As she is something of an expert with said person...

Consultation
Response Form



Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C – We are Park Home Residents

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C – SHOULD BE ABOLISHED

A commission/fee is already obtained by the site owner when a mobile home is bought, for instance – ours new was ██████ in ██████ and on making discreet enquiries from the manufacturers some months later, we found that the home was bought by the site owner for us- ready to move into at ██████ from the factory. We had no choice in buying direct from the manufacturer; therefore a profit/commission was paid by us in the beginning and that amounted to £45,000 in the pocket of the site owner – a fact that was conveniently not explained to us when we came to buy or in previous discussions with the site owner before we bought. A commission fee on selling as well is a “double whammy” and the site owner has done nothing to obtain this money – so they rub their hands with glee!

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

NOT APPLICABLE AS WE ARE THE OWNERS OF A HOME AND NOT A SITE OWNER – PLEASE SEE THE ANSWER GIVEN IN THE ABOVE QUESTION

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

This is giving the answer as a resident home owner

Commission income is received whenever a home is sold whether it be new or “second hand” At present there are ■■■ homes on our site for sale – all pre owned. When these are sold the site owner will make 10% on each home therefore making a huge commission for themselves for doing nothing. One of these homes are being sold as the homeowner ■■■■■■■■■■ has moved into sheltered accommodation. They still have to pay the monthly pitch rental and community charge and then get hit in the pocket again by the site owner taking 10% - to us it seems like daylight robbery of pensioners.

As a resident and home owner we do not know how the commission/income is incorporated into the site owner’s business plan

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

This is giving the answer as a resident home owner

Commission income is received whenever a home is sold whether it be new or “second hand”

As a resident and home owner we do not know how the commission/income is incorporated into the site owner’s business plan, we doubt very much if it is therefore it is a “nice little earner” for the site owner who does nothing except line their pockets – We think that is called exploitation!

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

It is dependent on your view with this question – does a council house tenant or ordinary home owner have to pay the council a 10% commission to the council when they vacate?

It is dependent upon the site owner, they have bought the land divided that into plots and are getting a fairly good rental rate for each of those plots. We do not think that it will make that much difference as commission is already taken when anyone buys a mobile home whether it is new or “second hand”

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

The site owner would try to put up the pitch fees and probably try to charge more for other so called amenities.

8. How does the payment of commission by a new occupier affect a resident’s ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

This is never explained to a mobile home buyer unless you have a good park site owner. Whenever a potential buyer – the few that we have seen realises this it does put them off the thought of having to pay the site owner 10% commission.

The other factor is that unlike bricks and mortar the mobile home devalues each year so each way you are caught – commission on the purchase; commission on the sale; whilst you as a homeowner have created a garden, improved the surroundings on your individual pitch so you are losing either way.

Had we know all of these facts we would not have sold our bricks and mortar home, also it will be like a millstone around the necks of our children when we pass on.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The only value that we can think of is the pitch improvements that we have made developing a garden with trees, flowers and shrubs. This does not mean anything though and this question seems rather obscure.

We would say no value at all as it has to be sited on a “pitch” We are not the ones going to profit – if we sold – the site owner gets 10% commission; we lose value annually; we lost money in the beginning when we were sold the home; we developed the pitch at our expense therefore – the site owner would make a tidy profit on the backs of us if we sold.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The main consequence is that unscrupulous park/site owners will try their hardest to put up the rental of the plot – the pitch fee per month regardless of the RPI/CPI. They would also find a way to increase costs of utilities.

Unscrupulous site owners – of which there are many would try and extort money from you in any way they could by claiming their maintenance costs had soared!

Evidence can be provided of an instant when we

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

*WE ARE NOT PARK SITE OWNERS – WE OWN A MOBILE HOME
AND WE CAN DEFINITELY SAY THAT OUR PARK/SITE OWNER WOULD
NOT SHARE THEIR PARKS ACCOUNTS WITH YOU. WE DOUBT VERY
MUCH WHETHER THEY ARE BEING DONE PROPERLY ANYWAY.*

*This should be a requirement that site/park owners should be made to
show their accounts annually as part of their site licence conditions.*

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

It has given park home owners more rights to protect them against unscrupulous site owners and more security, however site owners still do not adhere to the Act and it seems that if you have problems the only re-dress you have is to go to a tribunal each time you have a problem. This is costly and very stressful as all of us are pensioners some disabled as well, we did not ask to be treated and “fleeced” like this.

More stringent checks should be made by the authorities that grant licences to site owners – especially the “fit and proper” person test. The character of site owners should be taken into consideration and authorities should make un-announced visits to sites/parks to make sure that site/park owners are adhering to the Act and their site licencing conditions. A lot goes on behind the scenes going un-noticed by authorities who seem to turn a blind eye, and some site/park owners still refuse or will not adhere to the requirements of this Act.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No affect whatsoever, this is not really relevant.

All homeowners on our site/park are English except for [REDACTED] homeowners who are “locals” including us. If more Welsh speakers came here it would not matter at all in fact it would be advantageous. The only exception is the site/park owner is English and does not speak Welsh – [REDACTED]

I think that you would find that Welsh people are too “canny” than to buy a mobile home in Wales!

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We cannot really comment on how the policy could be changed to have more positive effects for more use of the Welsh language – it would be advantageous however if it were stipulated that site/park owners intending to own parks in Wales should be Welsh speakers as well.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

This space is not enough to address all the issues that we have on our park.

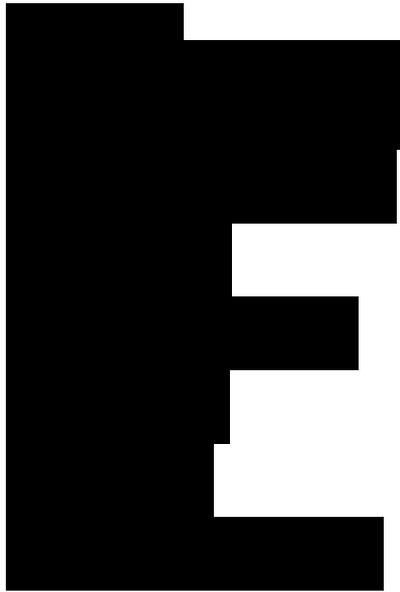
[REDACTED]

- *Our site owner refuses to recognise our Residents Association.*
- *Our site owner regularly sends emails and letters that are threatening and makes accusations against homeowners on our park/site which are completely unfounded, demanding replies be made within a two week period.*
- *Our site owner does not reside anywhere near the park – living in England for most of the time.*
- *We all feel very vulnerable and intimidated when our site owner does come and reside for a few days or a week*
- *[REDACTED] Our site owner stipulates rules that they and the family do not adhere to – [REDACTED]*
- *Our site owner refuses to adhere to licence conditions by displaying the latest copies of the gas and water bills – and is charging way over the price that they are paying. Bills are sent to us with a demand that they are paid in seven days.*

ETC.....

We do not really need a site/park owner as they do the minimal to maintain the site/park!

Consultation Response Form



Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

A park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

B or c. The home was purchased without a [REDACTED]. Together these additions cost me several thousand pounds on top of the cost of the home, and it should be rated as it was SOLD to me, IF the site owners continue to be allowed to claim their 10%. They SHOULD NOT be allowed to claim 10% from any home extras or additions.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I am not in a position to answer this question.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

At present, every time a home is sold by the current owner/s.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

It should be spent to improve the appearance of the site, but unfortunately, our site has been neglected over the last few years, since the Site Manager, does not live on site.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please

provide any evidence, supporting documentation you have to support your comments.

It should not affect the maintenance and upkeep of the site as previously stated, this site is neglected with very little money spent on it.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I cannot answer this matter.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I am also unable to answer this matter.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Unable to answer.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

I believe I answered this particular question at question 2. In addition to my previous answer at 2, the home owner also has to foot the cost of any slabbing etc at the rear of the property. The only slabbing supplied is a single slab path to the front door.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

[Redacted response]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I have not noticed anything.

[Redacted response]

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: c

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

c

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

For the Site owner to answer

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

For the Site owner to answer

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

For the Site owner to answer

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please

provide any evidence, supporting documentation you have to support your comments.

For the Site owner to answer

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

For the Site owner to answer

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I have for the past eight years wished to purchase a larger and better-positioned mobile home, but the commission charge does not leave me enough capital to purchase another mobile home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

If in the sense that you mean as opposed to a mobile home and freehold plot bought complete, I would personally prefer the latter to avoid paying ground rent. However, some residents would prefer the close community of others, a value that would be hard to calculate.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

With regard to the Park Home Commission charge, I wish to bring into question the legality of this commission charge imposed upon residents who have bought and paid for their own home. There is no effective work done by Site owners in the transaction between the seller and purchaser other than a change of resident name, for which the Site owners can gain a commission profit of between £4,000 and £20,000. However, in the case of abolition, Site owners would not hesitate to raise the ground rent, this would put up the living cost of those poor pensioners like myself, who at least have the choice to remain on site, therefore to avoid commission charges.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

For the Site owner to answer

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

For the Site owner to answer

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I fail to see a connection between commission change and the Welsh language. On this [REDACTED] site there are [REDACTED] residents with about 50% Welsh and 50% English, all in harmony with no issues.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

All Britons are notoriously lazy when it comes to a second language. However, it is up to individual welsh speakers ([REDACTED] to occasionally drop Welsh language words in conversation to others (at the same time translating). The slow drip effect.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Consultation

Response Form

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C PARK HOME RESIDENT

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C Be abolished.

Park home owners are making profit on the sale of a home at least twice depending on how many times the home is sold. When a home is first purchased our park owner makes at least 50K on the new home. He then makes a further 10% every time the home is sold, for doing absolutely nothing. He doesn't even have to meet the new owner. He has no costs in the process. He does not have to connect or disconnect any services. 10% clear profit for no work. It's not even re-invested in the site.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

It's clear profit for nothing. If nobody moved home the owner would only collect the initial profit on the sale. He cannot rely on residents moving to secure further money and the income of the first time purchaser plus the ground rent is more than sufficient to run the business.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

There are usually about 3-4 homes per year for sale on the park out of ■ homes at present. We have no information as to how that money is incorporated into the plan.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I cannot see where the commission is used on the site. There seems little improvement in the general appearance of the site. There are areas that need attention. The park owners put in less than a part time presence. Any further plot development only goes to increase profits made on the sale of new homes

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I imagine park owners will naturally call they cannot survive the cuts and all will go bankrupt. This will be absolute rubbish. They will probably protest that the ground rent will have to go up. Firstly we cannot afford increases of this scale and secondly it will defeat the object of the abolition of the commission. Perhaps park owners could make personal adjustments to their purchasing on brand new cars and houses to ensure they maintain a level of profitability.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

This is for the park owner to resolve. They make more than enough money with ground rent and initial purchase commission. There is no need for a secondary commission to be there in the first place. The property does not belong to them. Why should they receive 10% of the sale price for absolutely nothing.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Because it is such a huge amount to take out of the selling price some are left with a negative equity and have to reduce the amount of money they have to purchase a different home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

You purchase the park home through the owner to be installed on a pitch. The price includes the home and installation. The profit mark up is massive. The owner can ask what price he wants after taking all the costs into account. Some homes on our site command a [REDACTED] profit on sale

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Firstly to counteract knee jerk reactions from park owners by increasing ground rent. The MHA clearly states that the rent can only go up by the annual RPI. I don't see how an increase can be justified when they only cut the grass. Legislation to avoid this can stem this action. Park owners have built huge personal fortunes out of residential park home sites. Look at [REDACTED] as an example. Many owners probably will not supply details of the income and expenditure. I wonder why? The Welsh Government has to make it clear that there will be no further increases to resident's charges to accommodate this abolition of commission. They have no right to this commission

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

As a resident; all park owners should be made to submit their accounts to this consultation commission. If they decline to submit none of their comments should be taken into consideration. After all what have they got to hide?

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

It has stopped the park owners imposing charges and excessive rules on residents. It gives us far greater security of tenure. They now have to comply with legislation to run a professional site. It's a shame though they want to do less to gain more.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Many of the residents on this site come from England. I cannot see how the Welsh Language will have any effect whether there is an abolition or not of commission. To think there would be an impact is ridiculous

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Who wrote this question?

Many of the people answering this questionnaire are elderly. They won't even understand what you are saying. Do you honestly believe that removing or adjusting commission rates will have an effect on this outlook? I'm afraid you are looking far too deeply into supposed effect that a commission reduction would have.

Do you honestly think this question makes any sense at all? This is like watching an episode of the TV programme YES MINISTER !!!

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Consultation

Response Form

████████████████████

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Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer: C - park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

c- be abolished

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

In terms of sales, there is very little turnover on the park I live on, so I don't think the commission provides much income to the park owner.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

**Very rarely. Maybe once a year. I don't know anything about the park owner's business plan.
I've lived here █ years and never met him!**

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I don't know. There is very little investment in the park I live on.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please

provide any evidence, supporting documentation you have to support your comments.

As an owner, it would make it easier and cheaper to move to another location. It would encourage people to move onto a park - when I was considering buying my current home, I had to take into account that there would be a substantial cost if I sold my home within a few years of buying it. 10% of the sale price is a huge amount - and you still have to pay estate agents fees, surveys and conveyancing fees, etc

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

**The obvious answer is to increase the pitch fee, but owners could also manage their costs better and, in the case of the park where I live, fill the empty pitches which are numerous.
Owners could invest in solar panels on roofs - many of the park homes on my site are perfectly oriented for this, and not overlooked by trees etc.**

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Knowing that you will lose 10% of the sale is not an incentive to move, and could make the process uneconomic or unaffordable. Because of the problems with the economy and the jobs market, being able to relocate cheaply is essential.

It's not so much of a problem for retired park home owners, but owing to the low cost of park homes, I think they could have a huge role in solving the housing crisis. They shouldn't just be for the over-50s. Park homes for younger people should be available.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

In financial terms, I couldn't say, but it is relevant - homes pitched in the south of England sell for much more than equivalent homes in cheaper parts of the country.

In practical terms, a park home without a pitch is of little use.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Reducing or abolishing the commission would affect park owners income, but that could be offset in other, possibly fairer ways.

It would make buying a park home more attractive by making selling a park home cheaper.

There is a risk that unscrupulous park owners would use any change in the commission to impose unfair and over-the-top increases in the pitch fee.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The park home owner has posted new, stricter, terms and conditions of residence. There was no consultation with residents over this.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Allowing younger people to live on parks would help combat the issue of young people being unable to afford to live in their home towns/villages. This may help to preserve the culture of Welsh-speaking areas.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Those of us who live on parks would benefit from some sort of ombudsman to allow us to put pressure on park owners to ensure we have a decent standard of living and are treated with respect.

■■■■■ I have found someone in my garden replacing the electricity meter, with no letter of warning being provided!

We are often left without mains water (■■■■■, for more than 24 hours) due to degradation of the pipework.

We have no say over which company provides our electricity, and we pay a high price for each unit.

Everything happens by word of mouth in an informal way which is slightly feudal and relies on staying on the right side of the owner or his agent.

**Consultation
Response Form**

██████████

██

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██████████

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

I consider that we are good park owners operating one park in Wales and [REDACTED] parks in England. We have been operating residential parks for the past 53 years. We redeveloped the Wales Park [REDACTED] years ago to a high standard installing natural gas pipe work and a totally new electric supply to standard house supply capacity throughout the park at our expense.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Very few chances of new sales as is the case on all parks that are fully occupied, therefore assignment fees are very important to the business (retain 10%).

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

assignment commission is very important to the bottom line profit. 2014/15/16 account books available for inspection/proof on a confidential basis. The change from RPI to CPI has also reduced the income from pitch fees, plus additional red tape created by the 2013 act in respect of rent reviews, licences etc.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Private sales commission contribute important funds to be used directly to maintain a successful business.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

See no. 10

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

See no. 10

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

See no. 10

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

See no. 10

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The value difference between an onsite home and an offsite home is vast. We have experienced families who don't wish to bother refurbishing an older home find it worthless off site on the other hand other's who have tidied up the homes and with the benefit of the pitch have made a good price. Virtually no one would try and sell off site as the pitch is where the value lies varying from 70-90% of the retail price. You can independently check this by ringing around mobile home dealers and estate agents specializing in park home estate sales. There is virtually no market or value for the sale of offsite park homes.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

We as a family have operated park home sites for the past ■ years. We, as many other park operators have paid off our bank loans and therefore in these cases the parks will survive but at a lower standard as there will be generally less money spent on the parks. Over the previous years the 15% assignment fee was considered fair, in the 1983 act it was again reduced to 10% and considered fair, the pitch fee review again reduced the site income from RPI to CPI. You now consider possibly removing the assignment fee all together "WHY" if it has been previously considered fair and reasonable. The profitability of parks has been already gradually eroded including much additional red tape and paperwork with the 2013 act. The return on capital employed in parks is not excessive in fact it is low and any new entrant requiring a Bank loan would not find it viable. 10% assignment fee is surly a very reasonable fee to pay for another 20 years pitch occupation (average national assignment period). It is my firm belief that if you decide to further reduce the income to park operators you will do a disservice not only to the park owner and industry but also the resident's as the parks will deteriorate and therefore affect the resale value of the resident's homes and deter any would be buyers.

11.If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Brief valuations = size of park ■■■ pitches
Currant estate agent valuations ■■■ per pitch
Say- £■■■k per pitch x ■■■ = park value ■■■
Net profit on accounts £■■■ = 4.25% return on capital
Less assignment fees = ■■■ = 3.5% return on capital
(per annum based on 3 year average = £■■■)

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Additional red tape has increased paperwork in rent reviews and site rules consultations. Not being able to assist in any way to help the sale only to suggest contacting a solicitor, extra expense to the seller and buyer. Reduced commission from RPI to CPI.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No idea

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No idea

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

See no. 10

**Consultation
Response Form**

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

/

The Park Homes Commission Rate

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If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

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- e. A representative body for park home residents
- f. Other, please state

Answer: a: A park owner of a relatively small park that I have owned for █ years █. We provide the homeowners with an on-site full time warden service who also maintain the site to the highest standards. We have an extremely happy and close knit community and many enquiries from people wishing to possibly move here to live. We don't have any available plots for new properties so pitch fees and commission are the only source of income to maintain the current high standards.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

a: Be retained at the current 10% level. On smaller parks without any plots to place new properties, the total pitch fee income is insufficient to maintain the parks to the acceptable level both required and accepted. Current legislation only allows pitch fees to go up by the CPI annually and requires a great deal of time and paperwork to inform residents of the increase/decrease. Due to the current economic climate the cost of informing the residents is greater than the income derived from the pitch fee increase. Only real prospect of maintaining standards is the income provided by commission on private sales.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Over the [redacted] years from [redacted] to [redacted], our park business made an average loss of [redacted] each year.

Commission income averaged [redacted] each year over this period (an average of one commission on one private sale each year).

We will provide Welsh Government access to our accounts on a confidential basis as evidence of the essential contribution of this income in sustaining our business and the standards our customers rightly expect.

There is now no opportunity for sales by the park, so going forwards we can anticipate pitch fee income of some [redacted]. This means that commission will represent 18.4% of the income to maintain standards and staffing.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On average one per year [redacted].

With [redacted] pitches, this means [redacted]% of homes are sold privately each year.

Access to our accounts will provide evidence of this.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

A large proportion is used on the upkeep of the park and towards the wages of full time wardens. When purchasing the park we were fully aware of the current rules regarding commission and took them into consideration before spending large amounts of capital on upgrading the electrics, installing a new sewerage system, better roads, fencing and landscaping.

We have currently spent far more on the park than commissions received but this could not have been done without the anticipated commission income to repay the cost, and indeed would not have been done if having prior knowledge of the possible removal of the commission rule.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

On many parks it would have a serious impact on both the quality of the park and on employment. Without the commission, to make some parks financially viable, pitch fees would have to improve vastly to compensate and fund the business costs.

Some parks such as ours employ full time warden and ground maintenance staff, with the decrease in revenue their positions would have to be reviewed. Without the staff to carry out the repairs and maintenance plus the obvious cost of having to bring in outside contractors only the most urgent of jobs would get completed. This obviously would have both short and long term impact.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

With the restrictions on pitch fees reviews ways to increase revenue are extremely limited. To mitigate the impact we would seek a pitch fee increase even then we would have to keep park maintenance and upgrade to the minimum that the Mobile Homes Act 2013 Wales requires.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

We have no evidence that the payment of commission by a new occupier affects a resident's ability to sell a park home. It is our experience having spoken to owners selling that negotiation on the sale price takes into account the commission and seems to work just as well as when the onus of paying commission was on the seller. It is also found from our experience that the private sale of a home is often by a home owner's estate following their death.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

One example we have is of a home [REDACTED] selling privately on plot for [REDACTED] whereas a similar home in the same condition was removed from plot and is currently for sale for [REDACTED] and we have failed to receive any enquiries.

This indicates the rights over the plot on this attractive park adds at least £[REDACTED] (83%) to the value of the home.

We have evidence of the asking prices for both of these homes which we will provide to Welsh Government.

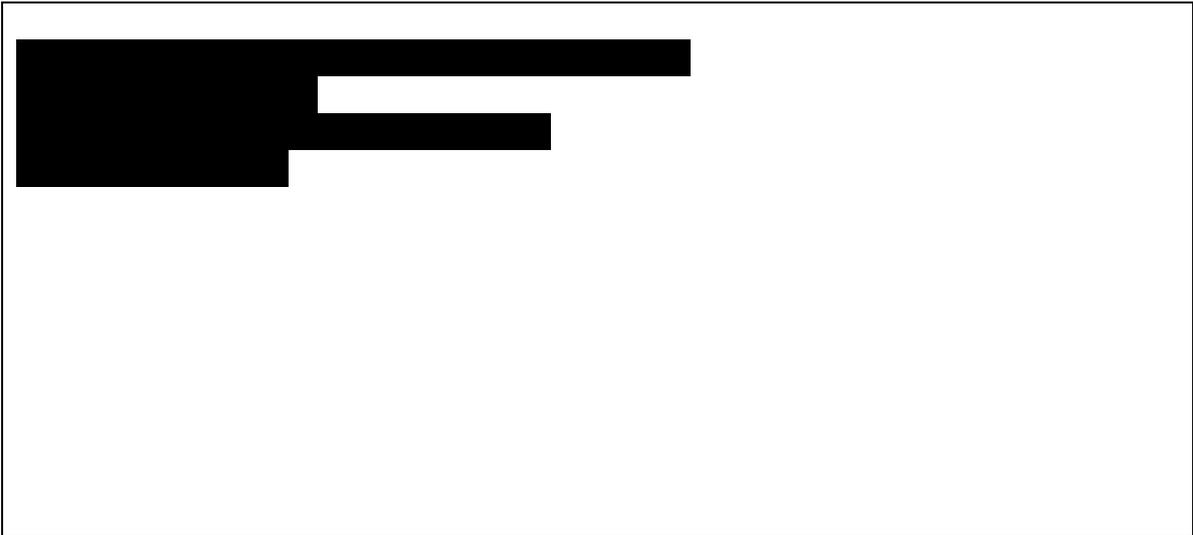
10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Taking away the park owners commission income would result in:

- 1. Less money spent on maintaining and upgrading parks having a detrimental effect on current home owners**
- 2. Possibility of full time staff losing jobs or on greatly reduced hours, our site for example could lose the security of its current 24/7 cover.**
- 3. Devaluing of park business impacting of businesses with lending and on the overall value and attractiveness of investing in residential parks in Wales.**

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.



12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We have always run our park strictly by the rules and as such it hasn't had a large scale effect on our park apart from a large increase in paperwork to ensure compliance. Also the decrease in pitch fee income due to the restriction in Wales only allowing CPI rises as opposed to RPI. Residents welcome the increased safeguards provided to them.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I have no positive or negative views on this point failing to see how the proposed changes whether adopted or not affect the Welsh language

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I don't feel that the proposed policy could be formulated or changed to affect the use of the Welsh language

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

If the consultation on the changing or abolition of commission finds in favour of abolition, would the Welsh Government put in place any policy to help particularly the smaller parks financially to maintain the standards required to enable the residents to continue to enjoy their current level of environment?

**Consultation
Response Form**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

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- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

I am a park home resident in [REDACTED]

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

BE ABOLISHED.

This iniquitous charge goes back to the 1960's. It was originally set at 25% and mainly applied to the sale of older static caravans. These were not worth very much money and were often assisted in being sold by the private individuals/ families that owned these caravan sites at that time. During the following 50 years these static caravans were replaced by modern Park Homes which are worth significantly more money, £180,000+ on many sites.

Over the following years the commission rate was reduced 3 times, until 1983 when it was set at a MAXIMUM rate of 10%, a rate that has been charged almost universally by most Site Owners ever since.

Site owners have given the 10% commission various names over the past years in a vain attempt to justify it. It has been called "A Site Transfer Fee" "A Park Exit Fee" "A Tripartite Payment Scheme" etc and is currently being called "A Deferred Pitch Fee" (see the recent PACEC report).

The Mobile Homes (Wales) Act 2013 removed Site Owners from the private

sales of Park Homes. They can no longer claim that this 10% commission is for their “assistance” with a resident’s private sale of their homes so it has now become obsolete,

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

On this site in the last year approximately █ pre-owned homes have been sold for an average of £█. This has resulted in the site owner receiving approximately £█. Considering he receives approximately █ pa in pitch fees the amount of commission is not a significant part of the overall income of the site.

Based on these figures no sensible business man would ever depend on the 10% commission as being a reliable portion of their overall income.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

In the last year approximately █ homes have been sold, but in the previous year it was only █, resulting in a maximum of £█. So this again shows that the income received from commission is not an important source of income.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I do not know

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

According to the company website, [REDACTED] own [REDACTED] sites containing a total of [REDACTED] pitches. According to the average monthly pitch fees of all these homes, they receive approximately [REDACTED].

So, as answers to 3 and 4 above, the commission does not constitute a large part of their income or appear to impact the viability of their business.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

**By making sure that people wish to purchase their new Park Home on a friendly, well maintained Park Home site.
By providing a Park Home site that existing residents are proud to call their home and one which they will happily promote as a worthwhile place on which you really want to live out your retirement in quiet enjoyment.**

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

**It has happened that when a potential buyer is made aware of the difference in the law and the rules and regulations of owning a park home, it has put them off owning a park home. Especially the fact that they would lose 10% of the value of their home if and when they decided to sell.
It is my belief that the abolition of that unjust 10% commission in Wales will confine these problems to the realms of history.**

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

I do not know.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition of the 10% commission in Wales, added to the extra security and financial advantages afforded to Welsh Park Home residents by the superior Mobile Homes (Wales) Act 2013 makes Park Home living in Wales a much better proposition than is currently offered on sites in England. Properly marketed and non-withstanding that Welsh Park Home sites are often in scenically beautiful areas of the country, this abolition should attract even more potential buyers of Park Homes to sites across Wales. Those homes will become more desirable and Park Home sites more valuable, thus providing direct monetary benefits to Site Owners, the local economy and to the local authority by their receiving a boost in Council Tax from often less populated areas of the nation,

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The superiority of the Welsh Mobile Homes Act over its English counterpart is well known and is recognised by Park Home residents on both sides of the border.

For example in Wales we have the “fit and proper person” provision, our pitch fees can only be increased by the CPI inflation index and the charge by a local authority for a site’s license cannot be added to our pitch fees are some of these advantages.

These benefits are missing from the English Mobile Homes Act and currently strenuous efforts are being made by English Park Home residents, supported by a number of their M.P’s, to up-grade their Mobile Homes Act to bring it up to the level of its Welsh equivalent.

For example;

GOVERNMENT CALL FOR EVIDENCE

You have until the 27th May to take part in this consultation and a copy of the document is available at:

<https://www.gov.uk/government/consultations/review-of-park-homes-legislation-call-for-evidence>

This latest English consultation has now closed, but currently the above link remains open for your information.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language,

and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N/A

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

The flawed PACEC report did nothing for either site owners or park home owners, so Cabinet Secretary Carl Sargeant is to be applauded for having the courage to challenge what at first appears to be a detailed and authoritative report. If the tone of this consultation is an indicator then I am encouraged that at last our many years of challenging that unfair and unjust 10% commission charge will at last be vindicated.

Consultation
Response Form

[Redacted]

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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

- a. A park owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

- a. Be retained at the current 10% level

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

It all depends upon how many re-sales a park owner has in any one year. In [REDACTED] years since we have received any commission from the re-sale of park homes The amount received was £[REDACTED].

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

In the last ten years we have had [REDACTED] sales which amounted to £34,800.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

The 10% commission helps towards the maintenance of the park i.e. with the servicing and emptying of the private treatment tank (we are not on the mains sewer) along with maintaining street lighting, road surfaces, yearly electricity reports, boundary tree maintenance, electricity admission fees, rent admin.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please

provide any evidence, supporting documentation you have to support your comments.

The re-sale value of parks will be reduced by thousands of pounds. The rent is pitiful on our park. It is around [REDACTED] for a twin unit and [REDACTED] for a single unit per calendar month, this also includes the sewage charge.

May I suggest that you contact all of the mobile park home estates agents below to confirm this:

[REDACTED]

[REDACTED]

[REDACTED]

Some years we have not made any profit whatsoever. If a park owner has not earned enough money it will be impossible for them to invest back into the park. Over a matter of time parks will become very run down.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We do not know what we are going to do, maybe try to sell the park, that's if anyone would be interested in buying it.

A family run business that owns one small park ([REDACTED] homes [REDACTED]) cannot be judged like a company that owns shall we say 10 parks.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The commission has been reduced from 20% to 15% to 10%. The idea of the commission in the first instance was to give the resident the option to remove their home from the park and sell it off site or leave it on the park owner's property and pay a commission for doing so.

So it was a case of take it off site and pay nothing or leave it on site and pay a commission which is a very fair option.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Mobile homes off site sell for around 85% of the value they would sell for on site.

Please see examples below that I have found on ebay then do a search for the same size mobile homes on site and you will be shocked at the difference in price.

Several mobile homes for sale as follows:

36' x 20' Omar 2 Bedroom Mobile Home - £14000

32' x 20' 2 Bedroom Mobile Home - £8000

42' x 10' 2 Bedroom Mobile Home - £6000

36' x 10' 1 Bedroom Mobile Home - £3000

12' x 32' Old Static Caravan - £200

Mobile Home Roof - £300



ebay.uk - Yahoo Search Res. | Mobile Static Chalet Park H: X +

www.ebay.co.uk/itm/Mobile-Static-Chalet-Park-Home-Caravan-Stately-Albion-Chatsworth-Gold-/162545

Most Visited | Getting Started | 0 Notifications | Amazon.co.uk - Onlin... | daily mail - Google Se...

Hello James. | Daily Deals | Sell | Help & Contact | My eBay

Shop by category | Search... | All Categories | Search

Back to search results | Listed in category: Cars, Motorcycles & Vehicles > Campers, Caravans & Motorhomes > Caravans > Static Caravans

Mobile Static Chalet Park Home Caravan Stately Albion Chatsworth Gold

Ex celebrity owner:AS SEEN ON YOUTUBE

Item condition: Used

Classified Ad price: **£25,990.00**

[Add to Watch list](#)
[Add to collection](#)

This is a Classified Ad listing. There is no bidding on this item, so contact the seller for more information. Seller Feedback scores exclude classified listings.

Contact the seller: 07565137183
[Email the seller](#)

Item location: Lancashire, United Kingdom

Seller information: luckybags (952) (100% Positive Feedback)
[Follow this seller](#)
[See other items](#)

The above park home would sell on our park for around 100k. The price shown is a starting price, it would be bought for around 20K however if it was sold in the Midlands it would sell for around 180k.

ebay.uk - Yahoo Search Res. | Tingdene park home chalet X +

www.ebay.co.uk/itm/Tingdene-park-home-chalet-twin-unit-/182641329928?hash=item2a86458708:g:KP

Most Visited | Getting Started | 0 Notifications | Amazon.co.uk - Onlin... | daily mail - Google Se...

Tingdene park home chalet twin unit

11 viewed per hour

Condition: Used
Time left: 7d 16h (08 Jul. 2017 09:33:47 BST)

£11,500.00

[Buy it now](#)

[Make offer](#)

[Add to Watch list](#) (35 watching) | [Add to collection](#)

Best Offer available | Located in United Kingdom

Postage: Free collection in person | [See details](#)
Item location: Peterborough, United Kingdom
Posts to: Collection in person only

Delivery: Buyer is responsible for vehicle collection or delivery.

Payments: Cash on collection | [See payment information](#)

Returns: No returns accepted

Seller information: gemma-nathan232 (0)
[Follow this seller](#)
[See other items](#)

The above park home book price is around 2k. It would be purchased for around 9k. Literally the same park home is for sale on our park for 89K.

ebay uk - Yahoo Search Res... ** Reduced to Sell ** Reside... +

www.ebay.co.uk/itm/Reduced-to-Sell-Residential-Park-Home-34ft-x-10ft-/232370666194?hash=item361 Search

Most Visited Getting Started 0 Notifications Amazon.co.uk - Onlin... daily mail - Google Se...



Mouse over image to zoom



** Reduced to Sell ** Residential Park Home 34ft x 10ft

Item condition: **Used**
"Used Condition. Can be viewed at any time."

Classified Ad price: **£7,500.00**

Best Offer: [Make offer](#)

- [Add to Watch list](#)
- [Add to collection](#)

This is a Classified Ad listing. There is no bidding on this item, so contact the seller for more information. Seller Feedback scores exclude classified listings.

Contact the seller: 0800 644 44 99
[Email the seller](#)

Item location: Cheadle, United Kingdom

Seller information
serenityparks (0)

[Follow this seller](#)

[See other items](#)

Registered as a business seller

A similar park home to the one above is for sale on our park for 79K. The book price would be around 1.5k. It will sell off site for no more than 6k.



site with full planning approval for a Chalet Type Bungalow. Foundations are already in and passed by Building Control. Mains electricity, mains water, telephone and septic tank together with detached garage are all included in the sale. The mobile home can be included also if so desired. Offers around £195,950 (or £159,950 excluding mobile home).

The screenshot shows a web browser window displaying an Autotrader listing. The title is "1997 HOME SEEKER PARK HOME HOME SEEKER in Singleton and Greenhalgh" with a price of "£20,000". The listing features a photograph of a small, single-story caravan with a pitched roof and a chimney. To the right of the photo, there are bullet points: "1997", "Used", and "Static Caravan". Below the photo, the text reads: "Residential park home home seeker 36 x 20 double glazed central heating for sale offsite £20,000". A yellow "Contact Seller" box contains the phone number "075575 39460" and buttons for "Email seller" and "Print page". At the bottom of the listing, it says "139 miles from ABERGAVENNY". The browser's address bar shows "caravans.autotrader.co.uk/used-caravans/homeseeker/sunseeker/1997-home-seeker-park-home-home-se".

The above park home is worth around 7k off site, and around 85k on our park.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Our park will be reduced in value by over 40%.

Roads and street lighting will not be maintained due to lack of funds.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

[Redacted]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We think it is much better than before.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No effects whatsoever.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Not a clue, sorry.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I have no issues other than being worried about my business being destroyed.

**Consultation
Response Form**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

a – A Park Owner

At present, we own and operate [REDACTED] parks ([REDACTED]
[REDACTED] - totalling [REDACTED].

A member of the BH & HPA since [REDACTED].

We have owned our residential park of [REDACTED] pitches since [REDACTED].

We started our 'Family Business' back in the early [REDACTED]s and [REDACTED]
[REDACTED].

Our family business's speciality is to take very unloved parks (very rundown with very poor infrastructure), then we immediately invest heavily in the total upgrade of the park's infrastructure (above and below ground) to provide our residents and guests a quiet, immaculately kept, safe environment for their total enjoyment in either their retirement or their holiday experience

We say we own and operate 'Parks' not 'Sites'.

Our Residential Park has not had any development opportunities since [REDACTED] and since then we have only been able to recoup part of our initial investment of money and time. Since then we have relied on the pitch fee and any commission received to cover the day to day costs and any major improvements that have been required over the last [REDACTED] years [REDACTED] [REDACTED] water and electric supplies need to be upgraded on a regular basis to ensure a good quality and safe service to our Residents).

**4. On average, how often is commission income received by a park owner?
i.e. how often are pre-owned park homes sold? How is the income
incorporated into the business plan? Please provide any evidence you have
to support this**

Year	Private sales	
█	None taken place	█
█	2	█
█		█
█	2	█
█	3	█
█	4	█
█	3	█
█	1	█
█	None taken place	█
█	1	█
█	1	█
█	1	█
█	1	█
█	2	█
█	1	█
█	4	█
█	1	█
█	1	█
█	None taken place	█
Average	1.5	█

We only have █ homes on the Park so the above shows an average of 1.5 private home owner sale takes place per year over the last █ years.

However, over the █ years we have had 3 years where no private home owners' have put their homes for sale/sold.

Based on our past experience, we (the owners) pay for any additional purchase of equipment or materials, hoping that the commission received will part pay for this in the near future.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Commission (if any) received along with the pitch fee is required to maintain and to ensure the high standard of up keep for the following

- The day to day up keep and maintenance and repairs –
Grass mowing of communal areas and weeding of communal flower beds.
- Purchasing and planting of shrubs and trees. Ongoing replacement of infected or dead shrubs and trees.
- River bank - stopping soil erosion – maintenance of the river bank and tree maintenance.
- Tree maintenance - specialist tree surgeons have to be brought in.
- To pay for stationery, postage, telephone charges, concerning sending out invoices for electric water and sewerage to individual homes.
- Purchasing of new vehicles every two to three years (to insure they are reliable for of a [REDACTED] van at a cost of £17,000 + VAT [REDACTED] car costing £9750, the yearly cost of insurance for these vehicles, road tax for each vehicle, servicing and maintenance.
- The purchase and regular maintenance of equipment i.e.
[REDACTED] mower £995 + VAT,
[REDACTED] mower £3,600 + VAT,
[REDACTED] strimmer three in one tool long reach £895 +VAT ,
All machinery serviced by the supplier to maintain warranties.
All machinery replaced every three years on an 'old for new' bases.
All other tools are purchased new and replaced on 'a fit for purpose bases'.
- All the electricity and water meters have to be visually read, then recorded, then invoiced out to each home owner, (this happens quarterly).
- The ongoing maintenance of the mains electricity, water and sewerage up to the Park side of the meter to each individual park home.
Twice a year all drains and soakaways are jetted and all silt then sucked up and removed by contractor (lorry tanker) approx. cost £700 + VAT each time.
Blocked drains emergency call out does accrue a cost -price depend on time of day or night and if on a weekend.
- All electric and water meters to the individual park homes have to be maintained and replaced when found to be faulty no additional charge to home owners. The park owners are not legally allowed to profit from electric unit charges to the home owner when their meters have gone wrong and not registered electricity used the Park Owners have no means of billing the individual home for electricity that has been used.
To replace an electric meter is approx. £90 plus a registered electrician to install and connect.

To replace a water meter we have found that it'd better to fit a copper meter than replacing it with a cheap plastic meter that nearly always splits in cold weather. Price for a copper water meter approx. £80 +VAT plus installation.

- The Park has to pay the Electricity provider - monthly (not quarterly) by Direct Debit.
- The Electrical Installation Condition Report, produced by a qualified electrician who as to inspect, test and assess any faults or make recommendations, these works are rectified immediately by the electrician.
We have all our Parks annually tested (electrical) earth testing and breaker tests, all connections in supply boxes and distributing points around the Parks as recommended by the independent electrical contractors.
In our experience prevention of problems is better than cure.
- To pay for legal matters concerning the park.

Our park at [REDACTED] is in an area where there has been major redevelopment applications to the planning authority [REDACTED] causing concern and worry to our residents.

Please bear in mind these are older people who worry about any change that may affect them - we have had to consult with our solicitors and our planning consultant as to the possible effect on our residents.

All of these costs the Park owner pays for.

- The clearing of any rubbish left by residents – hedge cuttings, flower bed waste, fence panels, etc.
- Unblocking of sewerage pipes.
- The upkeep of the tarmac, road ways and curbing on the park.
- The annual servicing and replacement of fire equipment and signage
The cost for inspection and replacement of equipment can vary but normally starts from about £200 + replacements of out of date fire extinguisher.
- Contribution towards wages, PAYE, pension contributions, accountancy fees, and other business Taxes.
On average grass cutting and day to day maintenance of the park takes approx. 20 hours a week the hourly pay is £15 per hour plus travelling time which can be [REDACTED] [REDACTED] each way.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The residents are not asked to contribute any extra amounts on top of their monthly pitch fee.

The main reason the residents wanted to live on our park is because it is kept to high standards which could be lost if the Park loses revenue .i.e. the commission on sales

The value of our customers' homes would then be effected if we are unable to maintain these high standards.

Homeowners will only see their homes increase in value, if firstly the Park is maintained to a high standard (this is an ongoing matter every year), and they personally keep their home and the plot that it stands in clean, tidy and maintained.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We would have to increase the pitch fee or we would have to 'reduce costs' by cutting back on the maintenance and service schedule on the Park i.e. services to each individual home, the communal areas of the park, the tarmac roads and curbing and the slowing of the river bank erosion.

Most park owners of residential parks are very proud of their business unfortunately there will always be people who would like to enter this business who are not concerned about their residents therefore I think like many park owners who entered this business (purchasing the residential park) understanding that we receive a small pitch fee monthly plus 10% commission on the resales

In the event that the 10% commission may be reduced or removed a number of good park owners will no longer be able to maintain the high standards of their parks and may feel that it is better to sell their park at this point I fear parks will be sold to bad park owners at a very big cost to the elderly residents on such parks

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The commission payment does not affect the new occupier (it is not an additional charge to them) the amount is already in the agreed selling price between the seller and the buyer.

New occupiers like the idea of buying a low-maintenance home which is situated in an environment that enables them to live in a small friendly community of like-minded folk.

New occupiers have the full knowledge that only a small percentage of the fixed wage or pension they receive each month will be spent in payment of their pitch fee enabling them to enjoy their new environment which is kept and maintained to a very high standard.

If and when they - or their estate - decide to sell as long as the Park is and will continue to be kept at this high standard, their home will increase in value (for far more than the 10% that they will have to return to the Park when sold).

Almost 46% of the ■ private home sales in the last ■ years were made by the homeowner's estate. Examples can be provided.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Residential Parks are not to be treated in the same way as a Holiday Parks. The purchase price for a park home on a Residential park comes with a built in premium cost which gives the buyer the long term security of being covered under the Mobile Home Act Agreement. The purchasing of a holiday home (static caravan/lodge) is only a 'leisure investment' not for financial gain.

Example

On our residential park

- a. new two bedroom 40' x 20' twin unit sold in ■ for £60,000, this owner sold ■ for £118,000 making a gross profit of 49%
- b. pre-owned single unit 42' x 10' (age of unit approx. ■) sold by the home owner in ■ for £37,000 then resold again in ■ for £46,000. Making a gross profit of 24%.

More examples can be provided.

As stated in Q8, as long as we (the Park Owner) are able to maintain our Park, home owners will see an increase in their park home values.

The Park Home belongs to the home owner if he or she or their estate wish to remove the park home from the park the value would immediately decrease by well over 80-90% and in the worst case, if the home is no longer 'fit for human habitation' there is no value - it will cost to dispose of it correctly (to be scrapped).

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The Welsh Government altered index for the pitch fee review from RPI to CPI.

Before that, we had seen increases of 2-3%, now since the introduction of the CPI taken from the October calculation, we have had no increase at all [REDACTED]

i.e.

[REDACTED] 1st Feb 2014 using RPI 2.6% increase [REDACTED]

• 1st Feb 2015 using CPI 1.3% increase [REDACTED]

[REDACTED] 1st Feb 2016 using CPI 0.05% no increase [REDACTED]

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

[REDACTED]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We have found since the introduction of the new Act:

- decrease in the amount of the annual pitch fee review that we would have received if still using the RPI formula.
- the annual review now takes up a lot more of my time to prepare and to send out to each individual residents.
- we are not able to give any advice to either the home owner selling or the possible new owner of the park home – this is very frustrating when you know of possible problems with the information (or lack of information) given by the current home owners to new possible owners (all they are interested in is a quick sale).

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

In the every changing world we live in. In time wales will possibility once again be an independent country, it is very important that people living inside and outside wales are aware of the welsh language. To promote the Welsh language it must in the near future be on all signage. To enable residential parks in Wales to promote the Welsh language at every opportunity I feel that dramatically altering the revenue on residential parks (abolishing or reducing the 10% commission) will make it harder in the future to ensure all signage is changed firstly to Welsh then secondly to English.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We would like to update all our invoicing and stationary to firstly into Welsh language and then English language
This sounds simple enough but there is like so many things there is a cost. We have consulted with some residents but understandably they are concerned with the cost and feel if would be a good thing to have all correspondence in Welsh and English.
As the park owner we fully understand their concerns but we will be unable to absorb the extra cost IF our income is reduced.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

[Redacted content]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick or cross here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: A Park Owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

BE RETAINED at level set by Parliament following consultation – there is no reason to believe anything has changed following the last investigation into this matter – if there has it has not been satisfactorily explained to Park Home Owners who have made lifetime planning to develop their business along sustainable and viable business plans .

No PARK OWNER has ever had a satisfactory response as to why there was no financial enquiry into viability before the Mobile Homes Act removed their right in perpetuity to hold a licence – this removal may yet be tested in Law and the Assembly must demonstrate they have understood that our business model included long term plans to return commissions into improvements and viable business operations.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Commission forms a vital link in the development of a Park , it is a long term investment by the PARK OWNER not a Council , or an assembly but a private individual who contributes every penny towards development of an asset – that return is vital and obvious .

Why on earth would a business continue to develop , invest millions and see no return when they have improved , invested and risked their money only to find the return is then removed – be very careful in Wales there are only 83 of us as Owners if you (the Assembly) continue to bully us we will invest our money elsewhere , Parks will not provide the vital role they have today in providing low cost housing which all Parties in the assembly wholeheartedly support.

We have invested 1.8million in development costs , these costs continue to be repaid as the project continues – our Park is recognised as being one of its kind ,

We continue to provide unique infrastructure from sewers to transformers pavements to street lights , legislation continues to be our most expensive additional expenditure , planning , local council licensing , legislation and the assembly act as a drag on our investment plans for the future.

So far as we are aware the Park Home sector in Wales supports and creates REAL LOCAL JOBS , we pay and invest in WELSH COMPANIES building our Homes , we put our own money into the investment for a future return we plan ahead and income from commissions is a vital return on investment.

The imposition of any further legislation will make our business plan shrink and we will not invest without encouragement for our sector – no Assembly Member contacted has ever visited our Park unyet they seem to imagine they understand the business – do they really understand that we contribute essential funding for low cost housing.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

About once every [REDACTED] years is our experience , we have invested £ 1.8million and have received less than [REDACTED] commissions over [REDACTED]

Commissions are not easy to predict but form a vital income and return on investment

Commissions are a return on investment – look at it this way , would you develop your neighbours garden , add streetlighting , a pavement , a sewage plant , planting and landscaping , double width roads , BT installation a brand new state of the art electrical installation designed to protect each resident , abundant friendly office and management time , pay taxes , advice and help , new tarmac roads and even a new driveway for each resident and still not expect a return when they sell ?

Of course you would – and so do our residents , nobody when contacted will ever admit that they are delighted to pay a commission but it's a partnership – take it away and the partnership is one sided and unviable .

The Assembly needs to be extremely careful not to antagonise Park Home Owners again – we were bullied last time , the Act is a wholly improved workplace for us as Owners but don't imagine the assembly can simply remove our funding without a reaction, lower income will result in lower build of new homes and the assembly will have to take up the slack by building more low cost houses – this will waste public funds that previously were paid for by us as businesses expecting to operate in our sector. Lower taxes will also follow.

We buy every new Home made in Wales , employment in Wales will suffer we employ Welsh contractors , we are a [REDACTED] year plus Family business all our profits are retained in Wales , we have invested every single year we have owned and operated our business .

(95% of our homes are made by [REDACTED])

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Commission when it is received is reinvested in the Park and continues to assist in the repayment of business loans

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Lower than expected returns will reduce investment or stop it altogether we will expect serious consideration being given to our sector this time disgraceful that the assembly has never conducted any financial review of the business before the 2013 act – it is a fact that the Assembly has not reviewed our business until after the Act this was a disgrace and shows arrogant legislation without regard for the persons investing in Welsh Businesses

We have as Owners of a business bought knowing we had a licence for life now had that removed without consideration to our investments in Wales low cost housing - remove funds from our sector and taxes will fall , employment will be lost from welsh construction firms , the Assembly will face calls for improved public funding of low cost housing.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

The park Home Owner will need encouragement to invest by the Assembly it cannot rely on our funding to continue in an ever increasing loss of funding we rely on.

It is not fair , accurate or correct for Assembly Members to continue to regard it as acceptable to suggest that we as a business that may be legislated against incase of this or that – the Act had been granted sweeping new powers , we are all now vetted as operators and are extremely concerned our honesty at times is questioned – no body has ever been convicted or charged for sale blocking unyet an assembly member wrote to us saying that was a reason to remove the commission being put to them by the public.

The assembly must inform the public that they have significant rights in law against any unscrupulous activity and this cannot possibly be true or accurate of any Park Owner in Wales – if you do not it simply adds to misguided mistrust in our industry .

We are getting extremely tired of being accused of being dishonest greedy operators when precisely the opposite is true when you compare our investment which saves the public funds millions of pounds each year

It is wholly inaccurate to allow the public to believe that Park Home estates allow sale blocking – this has been dealt with by the Mobile Homes Act and it is a criminal offence – no Assembly Member should be making the mistake of allowing the public to raise this matter in relation to the collection of commissions – please note.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

THE HOME will always sell by desirability and we provide a brand new infrastructure in a sought after location – the upkeep of the estate will form part of the desirability – if we are forced to reduce investment desirability and consequently being able to sell will be affected.

No resident has ever contributed to our ongoing development costs they enjoy the rights and privileges associated with a private estate managed and manicured by the business they chose knowing that they had a commitment to recompense the Park home Owners at some future stage

Every single enquiry and resident is completely aware of this , it is easily explained and all sales we have ever been involved in have understood that

the payment of commission is vital to the estate management of their chosen Park Home Estate

We do not believe any Owner would wish to pay more in site rent or cost of home and infact every single home we have ever sold in wales comes with a guarantee that the price paid will be a price the customer can recommend We do not have any record of any customer ever being unwilling or unable to agree to the commission

On the whole we believe that Park Home residents can see value for money and accept that a business has to be viable going forward – realistically we cannot see that residents are unhappy paying a commission on a well run Park Home Estate.

It must be extremely un nerving for our residents always seeing an Assembly legislating against 83 operators and Owners of park Home Estates - this is something we should respond to and our professional trade body will respond to .

Can the Assembly kindly be supportive to our business efforts and as we are all vetted please become reassuring towards often vocal minority groups who may exaggerate to gain attention in the media –in relation to commissions we would urge assembly members to visit our parks and form their own opinion.



9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

You would need to ask a professional valuer that question – our experience is that the Inland Revenue valuation of each plot or pitch varies by location and consequently the community charge varies by band B or C on our Park .

We have highly desirable plots with sea views and it is only common sense that these may be seen to be more desirable and expensive .

A park home would normally be valued by Glass’s guide as a unit for sale in the trade – its value will reflect the market , original purchase and specification , its value on a desirable plot will add many multiples of this trade value.

Our business is selling park Homes and we make our business by selling new homes not renting plots all rentals usually are spent in the day to day running of a commercial Park Home Estate

Return on investment is planned years ahead with our Banks , take away an income from our Park and funding for investments are jeopardised.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The Park will not be invested in for the future provision of local low cost housing

Employment will suffer in Wales

Firms supplying us will contract in Wales

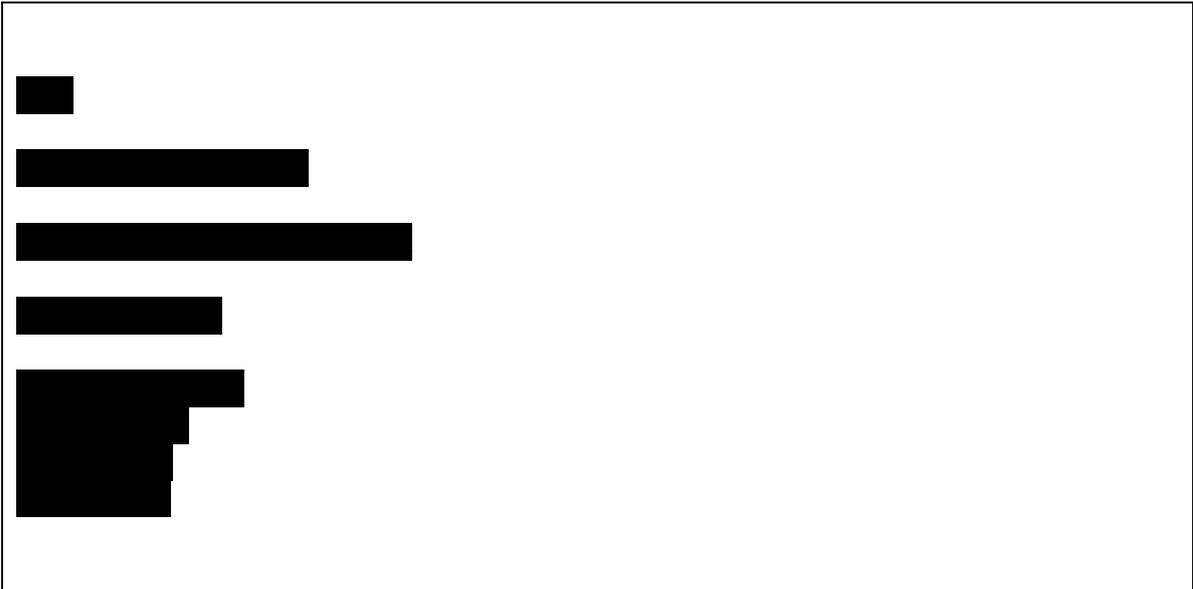
Our taxes will reduce

Local Welsh builders , quarries and contractors will all suffer

Park Home residents will not enjoy sustained development of their Estates

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.



12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The act was originally a model standard for the industry , that is forgotten and it largely antagonises residents now , the form filling the assembly has imposed is generally understood by nobody .

Park home Owners are no longer are involved in the process much to the dissatisfaction of our residents who deserve friendly assistance during their sale and as a result of legislation they can no longer receive , this was a huge mistake .

Generally the Act has cost us money to licence , although this may be tested in law , legislation looks likely again to cost us lost income. Frankly, in the end only the residents will suffer as investment is removed from Park home estates by Assembly legislation again bullying a crucial Welsh Business

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The commission rate will as far as we can see make no difference to the Welsh language or any other language we use .

We sell our homes to worldwide customers.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We would refer you to the above (13)

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Would the assembly kindly start to support our business and not continue to allow derogatory comments about us as Park Owners, we are a well run and honest business in Wales, we are generally with many years of experience and operate using local Welsh experience .

The assembly has been vocal and continues to believe we are a business needing legislation far in excess of any other business – we believe this is bullying and needs to be independently assessed.

Comments to the media about our business need to be supportive as we create Welsh jobs and employment, very often Assembly members simply accept a resident's often inaccurate exaggerated view as fact – surveys are then carried out and even if you ask anyone as a resident whether they are entirely happy paying a fee it is common sense to conclude they will not be - just ask are they happy?

And they are , we know that they are , you tell us a very different story to exactly how park home residents feel and enjoy our community and park home estates.

Very clear that assembly members are not visiting our Parks – please do so before any decisions are made which will be long term and result in poorer quality welsh businesses.

Please take great care to filter out any complaints regarding matters that have already been dealt with by legislation it cannot be fair or accurate to allow previously dealt with matters such as sale blocking to again be mentioned as a reason to abolish a commission fee.

Our professional trade body the British Holiday & Home Parks association have been very careful to advise you as an Assembly – reading the English review of our business may give you a much different picture of our business , please be aware the Welsh Park Home business is small , owner operated small business it relies on an income from commissions for investment.

The assembly risks further expense to the public if you remove our income , we invest to provide low cost housing which is wholeheartedly supported by all members .

**Consultation
Response Form**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

Are you:

- A park owner
- A representative body for park owners
- A park home resident (owner)
- A park home resident (tenant)
- A representative body for park home residents
- Other, please state

Answer:

Park Owner

██████████ Park has been in the Company's ownership for █ plus years. Originally █ pitches. Planning permission was sought in ██████████ to develop a further █ pitches. █ pitches are subject to a 106 Agreement for affordable housing with restrictions on the geographical area for prospective purchasers and they cannot previously have owned a home of their own.

No buyers have come forward who meet the criteria. This has restricted both sales income and any growth in rent income potential. Therefore the small number of private sales is a vital source of income now and will remain so in the future.

Purchasers are attracted to ██████████ because of its beautiful rural location and peace of mind that they can enjoy their retirement with like-minded people. The majority are looking to downsize coming from the ██████████ areas.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

a) Be retained at the current 10% level

Please see our reasons below.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Commission income is sporadic but boosts income generation to support the Park long term:



We will allow access to our Accounts on a confidential basis if required.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Year	Private Sales (Commissions)	
	0	
	0	
	1	
	1	
	1	

$$\text{Average over 3 years : } \frac{2.9\% + 2.9\% + 2.9\%}{3} = 2.9\%$$

You will see from the small number of homes sold in the past 3 years, that we cannot rely on commissions alone however these do provide an important capital top up.
We will allow access to our Accounts on a confidential basis.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Commission is used, in conjunction with ground rent, to facilitate maintenance/repairs, staffing and administration/legal fees. In addition, it will help us fund the purchase of new units when we are able to sell the [redacted] empty pitches (see 1 above).

We maintain roadways, boundary fences, provide residents with paint of approved colour for front fences, grass cutting, tree maintenance and street lighting. These services are provided by our own staff and sub-contractors.

Staff costs - all administration (including rent collection, meter reading, rent review paperwork, legal, sales enquiries) is carried out by [redacted] with a nominal amount re-charged to [redacted]. If the Park [redacted], we believe it would not be viable.

We will allow access to our Accounts on a confidential basis

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

*Overall, general maintenance and repair work would suffer.
Replacement of services would take longer.
Time given to running the Park would be reduced.
Would consider selling the Park due to lack of return on investment.*

We will allow access to our Accounts on a confidential basis

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We would consider seeking to compensate through the pitch fee (subject to the regulatory process).

[redacted]

We would be very reluctant to cut services provided to residents particularly as many of our residents are elderly. We believe this would be a betrayal of our commitment to provide the attractive, well maintained and secure environment that they bought into.

However there are many situations where residents require help that is not our obligation to respond to; but we do so. We would seriously have to consider the cost implications of this action in the future. This could lead to a breakdown in our good relationships with owners and to them suffering additional costs.

Consider that we would sell the Park due to return on investment.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

We have generally found that the market for 'bricks and mortar' properties has the main impact on finding a buyer. If potential buyers cannot sell their properties, then the park resident faces delays in selling.

The information provided to new purchasers is transparent and all are aware of commission payable on sale. We have not encountered any adverse reaction to the 10% commission amongst potential purchasers.

We liaise closely with residents [REDACTED] to facilitate any necessary works required to enable independent living wherever possible thereby extending the timescale before they may need to sell.

Residents leaving the Park fall into several categories:-

- *A partner dies and the surviving partner moves into sheltered accommodation to be closer to relatives*
- *Have passed away*
- *Requiring care in a nursing home*

Very few require capital to fund another purchase.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The ability to find a buyer for a mobile home taken off Park will seriously affect the price, particularly with older homes which may be difficult to move without causing damage and bearing in mind the restricted re-sale opportunities elsewhere.

It has been very rare [REDACTED] for homes to be taken off park.

As each home is based on a standard model but tailored to suit the original individual purchaser, reference to the Glass's Guide (which does not give prices for all models and years) makes it difficult to be specific, however we would estimate they are worth approximately 25% of their sited value dependent on the age and condition.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

RPI v CPI – You will see from figures below the impact on income that the change from RPI to CPI has had :-

CPI	0.90%	-0.10%	1.30%	2.20%
	2017	2016	2015	2014
	Yearly	Yearly	Yearly	Yearly
	Pitch	Pitch	Pitch	Pitch
	Fee £	Fee £	Fee £	Fee £
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

RPI	2.00%	0.70%	2.30%	2.60%
	2017	2016	2015	2014
	Yearly	Yearly	Yearly	Yearly
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	-38.91	-25.53	-16.05	-4.46
[REDACTED]	-46.97	-30.89	-19.44	-5.42
[REDACTED]	-53.43	-35.11	-22.18	-6.17

[REDACTED]	22	22	22	22
[REDACTED]	1	1	1	1
[REDACTED]	7	7	7	7
	30	30	30	30

[REDACTED]	-856.12	-561.72	-353.17	-98.12
[REDACTED]	-46.97	-30.89	-19.44	-5.42
[REDACTED]	-374.04	-245.78	-155.24	-43.18
	-1,277.13	-838.39	-527.85	-146.71

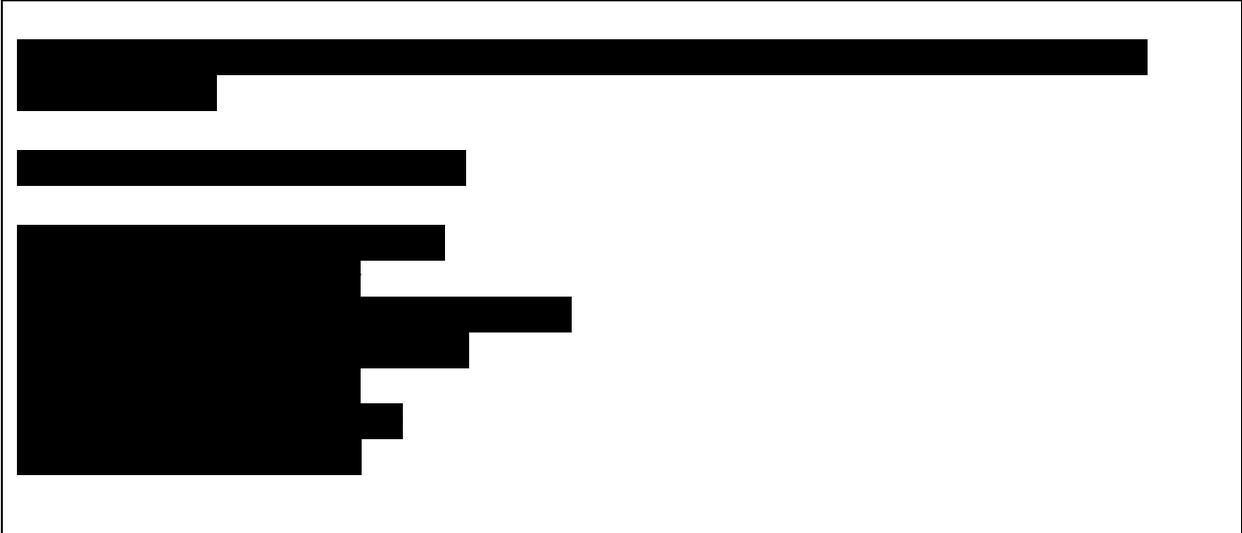
If commission is abolished, we would certainly give serious consideration to selling the Park to re-invest in more profitable business.

However, we envisage the sales potential and market prices of residential parks would drop considerably, particularly with regard to the limited frequency of sales where profit potential and return on investment may not be seen as a good investment.

Reduction in income will have an effect on future expenditure on the site, therefore the environment/service is likely to suffer, leading to a deterioration in the park community.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.



12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

As a responsible business we are, and always have been, committed to providing residents with comprehensive and transparent information. Residents have indicated to us that they find the 8 page review form and the new sales process confusing.

We also consider Site Licence conditions (renewing every 5 years) to be off putting to private home buyers and also may have the effect of limiting development and potential future sale of the Park.

However the introduction of 'Fit and Proper Person' Licence is an important step forward.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We cannot identify any impact.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no suggestions.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

None

Consultation Response
Form

[Redacted]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

E. Residents' Association (RA), representing 23 members out of ■ occupied homes on our park.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. BE ABOLISHED.

The history of this aspect of park home selling is very unclear to us and seems rather outdated; however there can be no justification for charging commission upon purchase of a park home. When a site owner installs a new home onto one of their parks, notwithstanding the VAT etc that they can claim against their business (which obviously isn't of benefit to the home buyer), he/she includes a significant profit margin within the sale price to the first-buyers. Unless a prospective buyer gets into early discussion with the site owner about what he/she wants in their home, brand new homes usually come with all fixtures and fittings, carpets, curtains, white goods, furniture etc, all of which is paid to the site owner, and is added to the purchase price, upon which VAT is paid (and presumably reclaimed by the site owner?).

Since the rules changed in the 2013 Act, the prospective buyer is responsible for paying the commission. How can this be right, and how can the seller explain and justify it to the buyer? They are effectively giving money to a site owner for nothing other than a right to live on their park home site. Why? In our eyes, the (private) sale of pre-owned park

homes is very much the same as a “bricks and mortar” property, and in this situation park homes shouldn’t be treated any differently to that of a leasehold house on a ‘normal’ street. Do buyers of such properties have to pay the freeholder a percentage of the purchase price? NO.

(As an aside, Council Tax banding is also based on the FULL purchase price of a home, not its ex-works price, which is also an injustice. We don’t own the land on which the home is sited, and if we wanted to remove our home, we wouldn’t expect to be entitled to the value of the land upon which the home sits. Wales underwent a rebanding exercise in 2006 – it proved so unpopular that England decided to ditch its plans for rebanding! – and park home owners, [redacted] [on our site anyway] which had previously been banded as A were moved up into Band C. Generally around the whole country, park homes fall into Band A or B, [redacted]

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

This question is directed to site owners, but it is impossible to predict how many homes will be sold privately in any given year. Using our site of [redacted] inhabited plots as an example, in more than [redacted] years, only [redacted] homes have been sold ‘privately’, so it would very much suggest that that the commission contributes very little to the overall income of a site business, therefore there is no need for it, and should not feature as an income stream to their business.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

See our answer to Q3. On our site, almost as many pre-owned homes have been sold directly by the site owner (after having been purchased by him from outgoing residents or the family of a resident who has died) as those sold privately, so the 10% commission is not applicable (presumably).

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Again, a question for site owners, so we cannot answer, however we know that our site owner [REDACTED] run several park home sites – and we're sure there is no such thing a poor site owner.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Again, a question for site owners? As home owners, we feel that abolishing the commission altogether should have very little impact, no impact at all or possibly even enhance viability, as it might serve to encourage more potential residents into the park home 'lifestyle', thus encouraging site owners to expand their empires and gain bigger profits from one of their biggest income streams – new park homes - with the resulting big profit margins and ground rent.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

All site owners need to do is ensure they have a well-run site, keep up with the maintenance (which is paid for from costly ground rent) and promote an atmosphere where people want to live in peace and harmony.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

No one should look to purchase a park home without first doing their research, as park home living comes with a number of restrictions that 'normal home' owners don't have to adhere to. Potential purchasers might well be put off by being told that, for example, by agreeing to purchase a home from a seller for say £100k, they're then told that actually it's going to cost them £110k, as they have to pay £10k to the site owner. FOR WHAT?? This certainly puts lots of people off. Alternatively, seller and buyer might have to negotiate to come to an agreeable arrangement. Either way, the site owner gets their big cut, and the buyer/seller loses out.

In our view, the 10% commission is unjust and is keeping park home living in a more 'niche market', because the commission PLUS a not insignificant ground rent (which, we must say, is far in excess of ground rent paid in a 'normal' leasehold property) is a major factor and is likely to be putting people off buying a park home altogether.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

In our view, being situated on a pitch constitutes the whole park home package, as one can't live on a park home site without being sited. When a new home is sold, as mentioned in the answer to Question 2, the site owner factors in a significant profit margin, on top of what he/she pays for delivery, siting etc, as the ex-works price of a park home is just a percentage of what home buyers pay for the whole package. In addition, other than perimeter fencing, drainage, roadway and lighting (although this varies between sites), home owners are responsible for the upkeep of the ground surrounding their home, so the site operator generally has very little maintenance to do, once a site is fully occupied and running smoothly.

If a park home is sold privately in future years, the seller sells their 'right' to that pitch to the new owner and transfers the Written Agreement to them. In this respect, nothing changes, so how can there be any justification in a 10% commission (or any commission at all)?

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

We consider that abolishing the 10% commission would open up the concept of park home living to a wider population, and make more people want to embrace it. Site operators would benefit by this as their sites would become more attractive to potential purchasers and park homes would hold their value better. Currently, because of the financial outlay in purchasing/owning a park home (with ground rent/commission), and the depreciation suffered in the sector, plus the often restrictive site rules, people are not prepared to buy a park home.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A to homeowners, but good luck on getting agreement on this by site owners.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We feel that homeowners have better rights since the introduction of the Act, and that we have more say in how we are treated by the site owner, although thankfully we have had no issues of conflict here since our current site owner bought the site. Knowing that the cost of a Council's site licence cannot be passed on through pitch fees, that there is a tribunal process should it be needed, and CPI inflation-based increase to pitch fees is of undoubted security to homeowners. We feel that it will make those site owners who are less scrupulous think twice about flouting their responsibilities. Tightening up of rules and regulations means there is less scope for 'ambiguity' between owners and residents.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We don't really see how there could be any noticeable effects on the Welsh language. However, on our site we have a number of English residents, many of whom expressed an interest in learning a little Welsh pronunciation/place names/phrases to feel a little more integrated.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

See answer to Q13. One must remember that not all areas of Wales have Welsh as the 1st language, so it would very much depend on where the sites are.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Naturally this consultation is purely about the commission, and many of the questions contained herein relate specifically to site owners. Perhaps separate questionnaires might have been appropriate?

The fact is that in addition to the commission, significant ground rent is paid on a monthly basis to site owners. This can be quite a burden to people on limited income, the majority of whom are aged 50+ and retired/semi-retired. On our *small* site, (and we are a small site compared to most, ■ out of a potential of ■ pitches currently occupied and with no actual 'amenities' on site) home owners pay on average ■ a month, equating to payment to the site owner of around £ ■ per month and ■ a year - which increases in line with CPI. Given what residents receive in return for ground rent, the commission expected upon the sale of a home is an unfair burden. *It should be noted that our site is not the only one run by our site owner and his company.*

Site owners appear to do nothing whatsoever to warrant receipt of a commission, so why is it still in place? As we see it, there is no valid reason for commission of any sort, however if there are any costs incurred by site owners upon the sale of a home, for example some administrative paperwork (and surely that's all it could possibly be) a small remuneration to cover the costs of

such paperwork would be the most that could be expected?

The 10% commission shows that the industry is squarely in favour of site owners, not residents/prospective buyers, and this needs to change so that park home owners are not discriminated against just because we choose to buy into this kind of lifestyle.

There are many 'unscrupulous' site owners in the industry (thankfully ours isn't amongst them and is reasonable and approachable) who would seem to milk their 'captive market' (i.e. homeowners) for all they can get and give very little in return for the income they receive from the business users (i.e. homeowners).

We fully appreciate that site owners run a business not a charity, however we feel that the *industry* should change so that home owners are treated more equitably.

Please consider **abolishing** the commission on the purchase of park homes for the valid reasons given in this questionnaire by a consensus of park home owners.

Thank you/Diolch yn Fawr

**Consultation
Response Form**

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

[Redacted]



Private Sector Housing Team
Housing Policy Division
Welsh Government
Merthyr Tydfil Office
Rhydycar
Merthyr Tydfil
CF48 1UZ

11 August 2017

Consultation on Park Homes Commission Rate, FAO Consultation Response Team

In response to the above, I am writing on behalf of the CLA (Country Land & Business Association) to offer you some specific thoughts and to offer ourselves to provide further assistance in contributing to housing policy.

We represent over 3,000 landowners and land managers in Wales and campaign to promote the economic development and wellbeing of the rural community. A substantial proportion of our members provide a large proportion of private rented accommodation in the rural community. We ran our UK rural housing conference in Westminster on 5 July in which we published our *Strong Foundations – Meeting Rural Housing Needs* report
<https://www.cla.org.uk/sites/default/files/CLA%20Housing%20Report%20D7%20V2%2028.06.17%20AW%20HR%20SPREADS.pdf>

We have been calling on the Welsh Government to develop a *rural* housing policy as part of its general housing & community development strategy. It is clear to us that the rural private rented sector fulfils a range of social and economic needs in this community which do not exist in urban areas. Here a different approach is required, and this may include supporting the viability of park homes as a versatile low-cost/high-quality option

Our CLA report, based on a survey of over 1,000 landowners in England and Wales published this year reveals that:-

- Over half of our respondents firmly believe that a “Housing Crisis” exists in rural Wales and England. Any development that does not increase rural housing supply clearly exacerbates this crisis
- The private rented sector accounts for 12.9% of the rural housing market, social housing 11% - indicating a shortage of let homes
- In many areas, larger estate landowners manage almost 100% of the private rented sector. Housing associations and private housing supply companies are an urban phenomenon
- Supply and demand does not appear to drive-up commercial viability. Some 45% of respondents to our survey revealed that they let homes for below market rentable value, owing to non-commercial factors: supporting long-term tenants, employees, or compliance

with statutory regulations. It demonstrates that wider social issues influence the rural let housing market which must be taken into consideration

- The average tenancy length in the rural private rented sector is 7.6 years, 35% of our respondents stated that their tenants had occupied a property for over 10 years. This supports the argument that the private rented sector is critical to rural areas: anything that reduces supply clearly does not help to tackle the rural housing crisis
- Some 63% of our survey say they would invest in rural homes if there was greater support from authorities to facilitate this

Another research report published in 2016 demonstrates that rural landowners invest some £1.3bn per annum into the economy – about 30% of this is in rural residential accommodation. More than 30% see changes on Government policy as the key barrier for investment into rural development

We recommend that the Government must make an assessment on the impact of policies – such as fiscal changes affecting rural accommodation - on fragile rural communities and ensure any reduction in housing availability is mitigated by the provision of other residential options. The Government must facilitate rather than frustrate new investment in long term policies which provide stability as a foundation condition for further investment

In Wales, CLA Cymru is leading a conference on Rural Housing issues on 7th November in the Senedd when we will be bringing these issues to the attention of political stakeholders in this country. We expect this conference to be attended by many private sector housing providers. We would be delighted to engage with you in the conference for mutual benefit.

Yours sincerely,

Robert Dangerfield
CLA Cymru

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

Park owner

We own [REDACTED] Park in [REDACTED] Wales.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

a: Be retained at the current 10% level.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Commission supports maintenance of the park including the high upkeep of the park and investment in drainage and electricity. All of these actions are funded by commission payments.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

If commission was abolished the price of residential parks would reduce. Receiving Commission payments make it easier for residential park owners to receive bank loans.

Reducing or abolishing commission would make purchasing a residential park less attractive.

It would also devalue a park home, this is because most of the site is connected to the mains. If the park received less income through reduced commission, this would place the continued maintenance of the utilities at risk. The cost of funding this maintenance would then be added to the pitch fees.

There would be an increase in the number of Residential Property Tribunals about pitch fees where homeowners disputed the increased pitch fees, consequently the standards on parks would deteriorate. The inflated pitch fees would make it harder for people to sell their homes privately. The increase would be inevitable if the park owners were unable to obtain the 10% they would have to fund repairs etc somehow so it would be realistic for it to be added to the pitch fees charged.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Cuts would be needed in the following areas:

- Maintenance/repair
- Replacement and capital spending
- Staffing/administration
- Costs of borrowings

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

The business invested heavily when [REDACTED] Park was purchased through installing services and improving the park. We installed the necessary services, however this was carried out with the expectation that commission payments would allow the business to recoup the investment.

If there had been no commission, we would not have purchased the park and invested in Wales.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Commission payments allow for investment in the park, this in turn then increases the value of a park home. Commission payments allow for pitch fees to remain lower.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Through being located on a pitch on the residential park, this allows for improved utilities through connections to BT, mains electricity, mains gas and water.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The main issue if commission payments were reduced or abolished would be less interest in buying residential parks. Potential buyers would switch to purchasing holiday parks and the value of park homes would also fall with standards and maintenance placed at risk.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

No

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We have noted the reduced income received from pitch fee reviews through being limited to using the Consumer Prices Index instead of the Retail Prices Index.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We haven't identified any impact.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no suggestions.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Abolishing or reducing commission would place investment in the residential park sector at risk and would harm the industry.

**Consultation
Response Form**

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

- a. A Park Owner. My family established the Park in [REDACTED].

We have [REDACTED] pitches with homes ranging in age from 19[REDACTED], being the oldest, and 19[REDACTED] the newest. We have a good, friendly relationship with all our residents.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

- a. Be retained. Reasons for this are explained in the answers that follow.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

The average contribution to park income from commission over the last [redacted] years has been 20%.

Calculated as follows:

$$\frac{\text{Commission}}{\text{Commission} + \text{pitch fee} + \text{sales}} \times 100 = \% \text{ commission}$$



You may see our accounts, if required

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Over the last [redacted] years, the average % of private home sales giving rise to a commission has been 4.16% of homes.

We can provide these figures over **10** years if needed, in which case average increases to 6.25% of homes sold each year.

The figures are calculated as follows:



The commission income is currently being used to [redacted] around park.

Major investment is required on [REDACTED] next, and the [REDACTED] will need work to update structure in the future. These will be funded from commission income.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

The commission income funds:

- maintenance of the park e.g. grass cutting, tree/hedge cutting, weed killing, litter picking, lighting and clearing snow when necessary.
- repairing underground sewerage/water system as required
- staff costs.

It was needed to fund the costs of the 2013 Act as these could not be recouped through the pitch fee.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Loss of commission income would make the park unsustainable on its own. It is a large percentage and vital source of income.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

In the short term, maintenance may have to be reduced e.g. grass cutting etc. less frequent.

Long term, projects to upgrade would be delayed or cancelled if unaffordable.

We would seek to increase the pitch fee to be able to undertake the maintenance required but if that were not possible ?? ultimately, would we be obliged to seek to change the use of the land ??

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Commission has not had a detrimental effect on the ability to sell park homes. E.g.

Since April 2011, there were █ private sales.

█

█

█.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

If a park home was sold off site, the value of the home would be greatly reduced.

█ a

Stately-Albion Sherbourne 1977 32' x 10' with small extension.

We have found 2 homes for sale on the internet, which show how much higher the value is for being sited, as these are also both younger and larger.

The home █ valued at █. The younger, larger homes off site are valued at £1,500 and £14,950.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Home owners benefit from a very reasonable pitch fee i.e. █.

The commission is then paid at the end of their tenure – usually by their estate. If raising the pitch fee substantially is not an option, the park becomes unsustainable without commission.

Selling off the residential land, may be the only viable option ????

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

[REDACTED]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

A lot more administration work incurring higher staff and stationery costs.

Attending courses, having a detailed site plan drawn up and licencing and registering site rules with [REDACTED] cost in excess of £1,500. This cost was not allowed to be compensated for through the pitch fee. Therefore the funding could only come from commission income.

In [REDACTED], our pitch fee review, using the c.p.i. meant that we were only able to increase our pitch fee by [REDACTED] per week. With an 8-page review form per residential, this was a loss making exercise.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We do not have any welsh speakers on our site at present.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We would like to emphasise that since, [REDACTED], we have not generated any income through new sales. The park is sustained by pitch fee and commission income alone.

**Consultation
Response Form**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

a) I own [REDACTED] Park in [REDACTED].

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

a) Be retained at the current 10% level.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

No park home sales conducted yet.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

No park home sales conducted yet.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

No sales conducted yet.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I recently bought the park in [REDACTED] and part of the business plan included receiving 10% commission on future sales of park homes to make my business viable as a long-term investment.

The Park is not fully developed yet and will need further work in the future. If commission had already been abolished, I would not have bought the park and invested in Wales. Commission was a key factor in making the wheels move for my business plan.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

There would need to be cuts across the board and there would be no contingency fund for unforeseen cost. When I bought the park, [REDACTED] works were needed which was a financial cost that had not been expected.

I know there is work that will need carrying out in the future, such as [REDACTED]. I know these costs are coming and without commission, I would struggle to carry these works out.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I have not experienced sales yet, however commission has not come up as an issue in potential sales enquiries.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Being connected to services and having the benefit of planning permission adds substantial value to the park home.

The prices of the park homes run in line with the local property market [REDACTED].

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Abolishing commission would have a really damaging impact on my business. Commission allows for the lower pitch fees over the agreement. I know that applying for a business loan without the projected future income from commission, would damage my chances of receiving a loan.

I would seriously consider selling my park and would not invest in Wales again.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I am committed to meeting the new requirements but have concerns about the time they take to meet. The paperwork can cause confusion for the elderly, retired homeowners and a lot of my time is spent helping the homeowners with the requirements of the Act.

Using CPI seems confusing and unfair where the previous system of RPI appeared to work well.

The homeowners move to my park for security and a simple life in retirement.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I am an English speaker and not able to comment.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I am an English speaker and not able to comment.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I am a new park owner and bought the park with a business plan that included forecasting to receive 10% commission on future park home sales. If commission was abolished, I would seriously consider selling my park and not invest in Wales again.

**Consultation
Response Form**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Private Sector Housing Team
Housing Policy Division
Welsh Assembly Government
Merthyr Tydfil Office
Rhydycar
Merthyr Tydfil
CF48 1UZ.

Reference; consultation response to the park home commission rate.

Response to Consultation Document.

We consent to the contents of this response to be made public but wish to remain anonymous.

Please find below response to consultation questions. Many of the responses cross over to two or more questions.

Q1. Are you a park owner, a representative body for park owners, a park home resident, etc?

We are a park home management company. [REDACTED]
[REDACTED], we manage parks with in excess of 400 residential pitches in Wales. I am authorized to respond to the consultation on behalf of [REDACTED] and the owners of the parks we manage.

We manage [REDACTED] parks in Wales. We also manage parks in England. All of the parks are managed to the same principles and standards whatever the location.

We specialize in high quality retirement parks for over 50 year olds and handle management and improvement/development of parks on behalf of park owners.

We supply new park homes to able bodied and disabled people who wish to continue with an independent lifestyle. The homes are single storey and offer a suitable form of accommodation for the elderly and disabled and being factory built they are easily able to be designed and built for the disabled to a very high standard.

We have very good relations with the residents of the parks and have been managing parks for almost [REDACTED] years. We manage parks which are both under development with new homes for sale through to “full” parks which receive only pitch fee and commission income.

Q2. Should commission on the re-sale of park homes in Wales be retained at the current 10% level, be reduced or be abolished?

The commission rate should stay set at the current 10% for the reasons identified in the answers to the following questions..

this seems to be a view shared by many and I have noted parks coming onto the market recently in Swansea and Pembroke Dock.

Q7. How might a park owner seek to mitigate the impact of those risks to the short or long-term viability of their site.

We develop and manage high quality developments for park owners seeking a long-term investment based on historic predicted income over many years. One of the main factors in choosing to develop to higher standards is the higher commission income associated with re-sales of homes on a high quality well maintained park. Re-sale values of park homes on good parks are much higher than those on bad ones. This benefits both the resident and the park owner. If there is no commission incentive our developments would be carried out to a much lower standard, as any extra profit in the value of new sales is wiped out by the extra cost of higher quality development, which would impact on the quality of life experienced by residents, and the ongoing refurbishment, upgrading and maintenance of parks would be cut to the minimum. In short, if there is nothing in it long term for the park owner why would he do anything other than that which was essential. He still gets his new sales profits and ongoing pitch fee income whatever. Without the commission income we would certainly look to raise pitch fees on any new sales, and on existing tenants where possible, and lower the quality of homes and developments to cut expenses and try to recoup lost revenue.

One park which we manage in Wales, which the owner purchased in [REDACTED], is extremely run down and has been earmarked for a complete upgrading and redevelopment project which would accommodate over [REDACTED] park homes for the over 50s. The infrastructure of the site is in dire need of replacement and at present the income from the park is extremely low. I have spoken with the parks previous owners who told me that the resale values on the park during the last 10-15 years had also been low, homes being sold for as little as £[REDACTED] up to the best on the site at around £[REDACTED]. Income from commissions had therefore been very low and the combination of low pitch fee income, £[REDACTED] per week per pitch, and low commission income had led to a severe lack of investment in the park. This leads to a downwards spiral with the park becoming run down and the homes losing value, not a good situation for the residents or the park owners. The previous owners had started a process of buying back older homes on the park and when the new owner purchased the park well over half of the pitches were empty.

The loss of commission income in this instance would be a real game changer.

The new park owner has been quoted for the complete redevelopment of the park which would involve a complete new layout, new roads, bases and private walled pitches. It would also include new directly billed electricity, mains water and mains gas supplies to the individual pitches, new street lighting, fire-fighting equipment and landscaping bringing what is a very poor facility into the modern era. To all intents and purposes, it would have become a new park. It was proposed to move the existing residents to newly constructed pitches with all of the above benefits and private on pitch parking, completely at the park owners expense, which would be a massive improvement to their quality of life. The overall cost of purchase and redevelopment of this park, if the redevelopment was to go ahead, would be in excess of £[REDACTED] million. This investment was to be made based on a reasonably predictable very long-term return based on pitch fee and commission income, but the potential loss of one of these important income strands has serious implications.

The owner of the park has decided to hold back the redevelopment and upgrading of the site pending the outcome of the commission rate debate and will consider selling the site for either housing or retail development if the rate is abolished or altered. This would mean the

loss of new single storey homes for the elderly located in a prime and sustainable location with the capability of accommodating over [REDACTED] park homes.

It has also meant that a contract with a Welsh park home manufacturer to take over [REDACTED] park homes over the next [REDACTED] years has been put on hold.

I attach at *appendix 4* a response from the manufacturer.

Q8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home?

We don't believe that it does. When purchasing a park home the prospective purchaser is fully aware of the commission payment due when they sell the home and makes an informed decision on the financial implication. They build the cost into their long term financial planning. On parks we manage pre owned homes sell as quickly as traditionally built homes locally and there are so few bungalows built these days that park homes remain very popular. We think you need to start with the question, "why do people buy park homes". In my time in the business it is clear that the business accommodates predominately the elderly who want to live safely and in a pleasant environment and community. Most customers tell me that they make the purchase believing that it will be their last home. They particularly like the fact that parks have rules which are enforceable. This means that they know what is expected of them, but also what is expected of their neighbours. It ensures standards of behaviour. Being in a close knit supportive community allows many residents to live independently in later life, a massive benefit to society. I regularly deal with customers who bring along family to look and decide on the purchase of a new home at our developments. The vast majority simply want the potential purchaser to be in a safe and pleasant environment and to be in a caring community. I regularly hear the comment "we would rather you be happy and us get a bit less in the will".

It must also be noted that purchasers of park/mobile homes cannot obtain mortgages and that all of our sales have been to "cash" purchasers, usually downsizing from larger properties in later life, thereby freeing up family properties to the housing chain. We deal with purchasers making an informed lifestyle choice, not people who can't afford anything else.

When someone purchases a park home in Wales, whether new or pre-owned, it is law that the Written Statement, which is the contract between the buyer and seller, is given to the purchaser a clear 28 days prior to purchase. We have copies in our sales offices to hand to prospective customers who usually receive them much earlier than the 28-day minimum. The fact that commission is payable on any re-sale is very clearly indicated in the Written Statement at section 9. *Sale of mobile home (4)*

The new occupier is required to pay the owner a commission on the sale of the mobile home at a rate not exceeding such rate as may be prescribed by regulations made by the Welsh Ministers

The fact that a commission is payable affects the pricing of new park homes by reducing the initial cost and deferring part payment until re-sale of the home, which in a good percentage of cases is by the purchaser's estate following their death. Without the commission we would most definitely increase the price of new homes and pitch fees.

Park homes are an affordable type of housing. They are considerably cheaper, in many cases around 40-50% cheaper, than similar single storey traditionally constructed homes in the same area. Even when the commission is taken into account a park home is still considerably cheaper and is a viable and affordable option.

Across all of the parks managed by us from 2014 to 2016 of all commissions received from re-sales on parks managed by [REDACTED] during this period 61% have been paid by the estate

of a resident who has passed away causing them no financial impact. A further 16% were paid by residents who went into care.

In effect, the commission is a deferred payment bringing down the initial outlay of a purchaser of a new park home which very often is paid after their death.

We have heard the argument promoted by some residents that it is unfair that a resident of a park home should have to pay commission on any increase in value of their home due to improvements they make to it.

Improvements are rarely required to modern park homes built to the relevant British Standards. The insulation values are now comparable, if not superior, to conventionally built dwellings and the homes are built to last many years. Improvements, as such, are usually only needed to older homes built to lesser standards which require upgrading of such items as insulation, windows, doors, roofs and the like. In any event, there are government funded schemes available to the neediest residents for upgrading or replacing insulation and heating. We have recently had residents of parks we manage have complete central heating systems replaced, boilers, pipework and radiators, under a government funded grant scheme and many others had the same works carried out under the NEST scheme a few years ago. Also, several residents on parks we manage have had full insulation of their homes carried out at hugely discounted rates being part funded by a government scheme. There have also been government funded schemes in the past to replace roofs, doors and windows.

Improvements should not be confused with maintenance, which is required whatever type of property one purchases. Many of the owners of such pre-owned homes purchased them at a discount due to the age and condition of the home. They must also have been aware of the commission obligation purchasing the home on a regulated residential site brought with the purchase and this must have been a consideration in their decision to purchase.

It must also be noted that there is help available from the public purse for the neediest park residents. Residents can, and do, have pitch fees paid by way of housing benefits and can also have full Council Tax payment made. Many residents of parks we manage obtain such help under the benefits system. Park homes are also banded into lower bands than conventionally constructed homes due to the fact that the owner pays a pitch fee.

Q9. How much value to a park home does being situated on a pitch add.

In my experience over 80% of the total value of a pre-owned park home sold on a pitch is down to the home being on the pitch as opposed to being sold “off-site”.

Below is a list of re-sales at one of the parks we manage, indicating model, age, price achieved and Glasses Guide (the leading trade guide for valuation of caravans and park homes) retail and trade values current as of April 2017. I attach a copy of the relevant sections of Glasses Guide at *Appendix 2*.

████████████████████. Sold 20██ for £110,000.00. Glasses Guide trade value £7,625.00 retail value £11,625.

████████████████████ Sold 20██ for £108,000.00. Glasses Guide trade value £8,325.00 retail value £12,575.

████████████████████ Sold 20██ for £82,000.00. Glasses Guide trade value £6,700.00 retail value £10,225.

████████████████████. Sold 20████ for £112,000.00. Glasses Guide trade value £6,700.00 retail value £10,225.

It should also be noted that all of these homes achieved re-sale prices well in excess of the price paid new on site by the first purchasers because they were on a well run good quality park.

I have sold older homes off site for park owners in the past for a fraction of what they would have made on site simply in order to be able to redevelop the pitch and upgrade it with a new home, which in turn improves the general appearance of the park.

10. The Welsh Government wishes to understand all of the consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view.

- i) Less investment in parks in Wales.
- ii) Less maintenance of parks in Wales.
- iii) Lower quality of development of parks in Wales.
- iv) Immediate devaluation of parks in Wales.
- v) Medium to long term deterioration of resident's quality of life on parks in Wales.
- vi) Rise in price of new park homes in Wales.
- vii) Rise in pitch fees on parks in Wales.
- viii) No future new park home developments in Wales.
- ix) The loss of a form of low cost retirement homes in Wales.
- x) As very few bungalows are being built this would cause the loss of one of the few remaining single storey retirement property sources in Wales.

11. If you are a park owner would you be prepared to share detailed information on your park's accounts with the Welsh Office?

We feel very strongly that we should not have to.

The park home business in Wales is regulated by the Mobile Homes (Wales) Act 2013 and as such we can see no good reason to have to provide accounts. The sector is probably the most regulated property business in Wales.

Our businesses are run well, managed well and fairly and are successful.

We feel that following the commission rate being looked at by government in 2002, 2006, 2014 and 2015 this consultation is a step too far. The reasons that the commission rate has remained unchanged for so long still stand the test.

Altering the commission rate would send out a clear message that the Welsh government does not encourage business investment in Wales. We represent owners who have invested huge amounts of capital in Wales and have based business plans and projects on the predicted income generated from these investments. They wish to remain profitable in order to expand their businesses by investing in their existing and further parks and to bring the standard across the park home sector in Wales to a sustainable and high quality.

Most of the parks we manage in Wales are in the development stage and as such much of the income generated is from the sale of new homes and for the Welsh government to base its opinion of the importance of the commission income on accounts from parks during the development phase of the business plan would be very misleading. The development phase of

a park, with multiple new home sales, is a very different business to the full park phase. The long-term effect of the loss of commission income on the viability of the business when full should be the deciding factor.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far.

The change in calculating pitch fee increases from RPI to CPI in Wales has caused an average 2.8% fall in pitch fee income during the period from its inception to the present day on parks we manage compared to what it would have been if RPI had remained.

I can demonstrate this as follows,

The CPI index inflation rate for October 2014 was 1.3%, for October 2015 was zero% and for October 2016 was 0.9%.

The RPI index inflation rate for October 2014 was 2.3%, for October 2015 was 0.7% and for October 2016 was 2.0%.

As the pitch fee rise is compound, the difference in increase from CPI to RPI during the period is therefore 2.86%.

This is the rate at which pitch fee income generated by Welsh parks we manage is falling behind English parks at present.

The introduction of the new procedures for notifying pitch fee increases, the fit and proper person test, the site rules consultation, the resale process paperwork and the five-yearly application process for license renewal and associated fees have added administrative costs to the business.

The Act has now handed responsibility for the repair of any defects to the base upon which a park home sits to the park owner. The park owner is also responsible for the provision of services to the mobile home.

Owner's other obligations

22 (1) *The owner must—*

- (c) *be responsible for repairing the base on which the mobile home is stationed and for maintaining any gas, electricity, water, sewerage or other services supplied by the owner to the pitch or to the mobile home,*

These are ongoing obligations and are transferred by the seller of a pre-owned park home to the purchaser. In effect, the purchaser has a guarantee from the park owner that any defects to the base or services, however caused and however old the base is, will be rectified by the park owner free of charge to the purchaser should the commission rate be abolished. If a base has defects it can be the case that the mobile home must be removed to another pitch, the base repaired and then the home returned and made good, all at the park owners expense.

Q13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We can see no effect on the use of the Welsh language.

Q14. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for

people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no suggestions.

Q15. If you have any related issues which we have not specifically addressed, please use this space to report them:

The planning consent required to develop a park home estate is virtually the same as for a conventional residential development. Licensing requirements limit the number of mobile homes on a development to approx. 15 per acre. The density on conventional residential developments is much higher. The only real incentive for a developer to develop park home estates is the long-term income derived from pitch fees and commission sales. It's a fine balance but park home investors are swayed by this long-term income as in the short-term income derived from sales of conventional housing is higher than income derived from selling new park homes. If the long-term income from commission sales is lost or reduced the balance will be tipped and the development of new sites and upgrading or redevelopment of older sites will give way to the land being sold off for conventional housing. A very popular and socially cohesive type of living accommodation and an "attractive, suitable and economically viable housing option" would most likely shrink in size and possibly disappear altogether in the medium to long term.

We invited AMs from all parties to visit [REDACTED], in order to see a well-developed, well managed park, as opposed to some of the really poor parks in Wales, and to be able to understand this side of the business. AMs from Plaid Cymru, the Conservative Party and UKIP responded and visited to discuss the issues and see the development. Whilst we did not agree on everything I believe that the visit was informative. They really seemed to have no idea that there was a quality side to the mobile/park home business. We invited 3 Labour AMs but they all declined. [REDACTED]

[REDACTED] Carl Sargeant also declined. His statement that he was minded to abolish the commission payment, before the consultation, leads many in the sector, myself included, to believe that he and his party have already made up their mind. We are convinced that the consultation is just window dressing to make it appear that they have listened to the argument. I have heard park owners say that they will not respond because there's no point, "they've made their minds up anyway". We do feel that there is a complete and utter misunderstanding of the sector by the Assembly. Without viewing a large cross section of the types of sites in Wales you will never understand the arguments.

We do feel that it would be extremely unfair to alter the commission rate since every single purchaser of a home on a residential site, whether new or pre-owned, is aware of the commission requirement. When purchasing a pre-owned home, they are most certainly aware that the previous owner had 10% deducted from the sale proceeds. The new purchaser, fully aware of this, and obviously after considering the implications, then signs a legally binding agreement with the park owner that includes their obligation to pay the commission should

they re-sell the home on the plot. It does seem a little rich that a group of residents have now decided that they want to renege on this obligation and break the contract between themselves and the park owner. Frankly, if they didn't want to pay a commission they shouldn't have purchased the home in the first place. Put simply, they purchased it because they liked the home, liked the price, liked the park and liked the lifestyle. They just don't seem to like the obligation to pay the commission that they legally entered into. It is a fact that when a resident sells their park home to a purchaser they are also selling the right to use the park owners land for many years to come and giving the new purchaser a guarantee that any defect in the base that the home sits on, or the services connected to it will be repaired or replaced in future, all at the park owners expense. They do of course have the option of selling the home off site, a right granted under the Mobile Homes (Wales) Act 2013, without paying any commission, an option rarely taken up due to the fact that 80% of the value of any resale is achieved due to the home being sited on the park owners land.

If the Welsh government is serious about lowering the costs of living on a park home estate perhaps it should go back to banding all homes in band A for Council Tax purposes, as they still are in England. The re-banding of park homes increased the cost of living in most park homes significantly. It should be remembered that as park home estates are privately maintained by the park owner, with no public money spent, very little is received by the residents from Council Tax payments other than refuse collection.

Be careful of unintended consequences. If the commission rate is altered you could end up with a race to the bottom with Welsh parks becoming the worst in the UK due to lack of investment and lack of incentive for park owners to maintain to high standards. This would impact both on the viability of parks in Wales and on the quality of life of all park home residents living on parks in Wales.



(Revised Quotation 2)

ITEM	DESCRIPTION	QTY	UNIT	RATE	VALUE
	Existing Site Road To your suitably swept and cleansed asphalt foundation Supply and apply a tack coat of bituminous emulsion	1859	m ²	£ 0.35	£ 650.65
	Surface Course Overlay - Option one Supply & lay by machine 30mm average thickness of AC 10mm Close Surface Course, 100 /150 penetration Bitumen binder, limestone agg'. All in accordance with BS EN 13108 Part 1 and BS 594987:2015	1859	m ²	£ 8.27	£ 15,373.93
	Surface Course Overlay - Option two Supply & lay by machine 30mm average thickness of SMA 10mm Surface Course, 40 /60 penetration Bitumen binder, Limestone agg'. All in accordance with BS EN 13108 Part 5 and BS 594987:2015	1859	m ²	£ 8.87	Rate Only
	SHEET No. 1 of 1				£ 16,024.58

Park Home Commission Rates

Further to your call this morning and as discussed, affordability of finance is the key aspect for us when considering and assessing finance proposals. We are always keen to ensure that the total debt repayment costs (capital and interest) are affordable, with some level of comfort, from the generation of profit and / or cash from the relevant business(es).

Track record, security, management, etc., etc., are also considered and assessed once we are comfortable with affordability.

With regard to existing / well established / full Park Home sites, the Park Home Commission rates are a key factor in the existing, ongoing and projected profit and / or cash generation of the site. If that income is reduced it could make the affordability of finance more stretching. I would also assume that a reduction in Park Home Commission rates would also potentially reduce the asset value of existing / well established / full Park Home sites.

It is difficult to quantify the size of the impact of a reduction in Park Home Commission rates but I believe that it could potentially impact some sites by between 5% and 30% of annual income.

Yours sincerely,



Relationship Director
NatWest Commercial Banking

GLASS'S

April 2017
Caravan Values

Caravan Guide

CONFIDENTIAL NOT FOR RESALE

@GlassGuide



Touring Caravans Underwritten

Paul Clarke
07788 925 825

THE CARAVAN COMPANY

Andrew Scott
07850 536 767

APPENDIX 3

APRIL 2017

* -- ALL RETAIL VALUES ARE INCLUSIVE OF VAT -- *

OMAR

	Type	Length (ft)	Width (ft)	Cost New	Glass Retail	Model Year	Glass Trade
QUILTON EXCEL — Continued							
2DB X Lounge	36	36	20	29051	10750	1997	7000
				34361	13350	1999	9275
				35392	14900	2000	10800
				37547	16550	2001	12450
				40038	18700	2002	14225
				43936	20575	2003	15775
				44171	22375	2004	17250
				45496	24350	2005	19225
				51383	26500	2006	20875
				56147	28225	2007	22225
				56869	29475	2008	23850
				62701	31075	2009	24850
				65225	32550	2010	26550
				65225	33950	2011	27700
				64201	35325	2012	29000
				65224	36725	2013	30400
3DB	36	36	20	29329	11025	1997	7450
2DB	36FD	36	20	32903	12775	1997	9125
2DB En-suite, FD				35722	14175	1998	10425
				37551	15500	1999	11675
				38978	16875	2000	12800
				41032	19175	2001	15100
				43074	21675	2002	17200
2DB	38	38	20	43147	—	2002	—
				45110	—	2003	—
				46791	—	2004	—
				50254	—	2005	—
				52766	—	2006	—
				57658	—	2007	—
				61426	—	2008	—
				64331	—	2009	—
				66907	—	2010	—
2DB CH DG TPR	40	40	20	62633	—	2008	—
				65587	—	2009	—
				68224	—	2010	—
				68224	—	2011	—
				68979	—	2012	—
				68003	—	2013	—
2DB CH DG TPR Uty	40	40	20	63910	—	2008	—
				66937	—	2009	—
				69616	—	2010	—
				69616	—	2011	—
				68532	—	2012	—
3DB	40	40	20	31688	11625	1997	7625
2DB				36930	13150	1998	8975
				38716	14375	1999	10125
				39877	16000	2000	11800
				42305	17950	2001	13750
				45113	20275	2002	15800
				46015	22300	2003	17500
				49772	24275	2004	19125
				51275	25400	2005	21275
				53839	28725	2006	23100
				58831	30625	2007	24625
				58831	31950	2008	26300

APRIL 2017

* -- ALL RETAIL VALUES ARE INCLUSIVE OF VAT -- *

STALEY

	Type	Length (ft)	Width (ft)	Cost New	Glass Retail	Model Year	Glass Trade
TREDEGAR — Continued							
2DB Uty	38	38	20	31055	10075	1997	6525
2DB En-suite Uty				33107	11175	1998	7350
				33107	12225	1999	8500
				35723	13300	2000	9325
				36737	14800	2001	10800
				39994	16700	2002	12225
				41695	18375	2003	13575
				42346	20000	2004	14850
				46446	21775	2005	16850
				47839	23700	2006	18050
				49753	25225	2007	19225
				53807	28350	2008	20700
				56315	27800	2009	21525
				58475	29125	2010	22300
				58475	30350	2011	23150
				62944	31600	2012	24100
				62844	32825	2013	25325
				69811	34075	2014	26575
				69811	—	2015	—
				72831	—	2016	—
2DB	40	40	20	31786	10225	1997	6700
2DB Uty				33864	11425	1998	7350
				33864	12575	1999	8325
				36718	13750	2000	9300
				37820	15200	2001	10650
				41106	17000	2002	12525
				43161	18700	2003	13900
				44456	20350	2004	15200
				48080	22150	2005	17000
				49522	24100	2006	18450
				51503	25675	2007	19675
				55700	26800	2008	21175
				58302	28250	2009	22000
				60532	29600	2010	22900
				60532	30875	2011	23750
				65047	32125	2012	24700
				65047	33400	2013	25975
				72280	34650	2014	27225
				72280	—	2015	—
				75180	—	2016	—
2DB 1SB	40	40	20	32255	10250	1997	6525
2DB 1SB En-suite Uty				34386	11450	1998	7525
				34386	12600	1999	8425
				37236	13750	2000	9225
				37820	15200	2001	10700
				41686	17000	2002	11600
2DB En-suite CH DG TPR	40	40	20	48758	—	2005	—
				48758	—	2006	—
2DB 1TW CH DG TPR UI	40	40	20	52230	—	2007	—
				56484	—	2008	—
2DB 1SB CH DG TPR UI	40	40	20	61386	—	2010	—
				61386	—	2011	—
				65962	—	2012	—
				65962	—	2013	—
				73277	—	2014	—
				73277	—	2015	—
				76238	—	2016	—

APPENDIX 4



14th August 2017

Dear Sir,

Re: Consultation on 10% commission rates on Park Home sales.

I write to express my deep concern regarding the possible removal of the ten percent commission rate on the sale of park homes.

[REDACTED] are the oldest manufacturer of park homes in Europe and one of the largest producers of residential park homes in the UK.

[REDACTED] for over forty years and employ over 200 people in our 2 factories.

We have been made aware of the intention of the Welsh National Assembly to either abolish or reduce the commission rate on the sale of a residential caravan/park home in Wales. This matter is a grave concern to us for several reasons:

1. A reasonable percentage of our business is sold in Wales. The reduction or abolition of this commission will undoubtedly cause a slowdown in business for both the short and long term.
2. This action may set a precedent further adopted both in England and Scotland.
3. [REDACTED] The said customer has now put the development on hold pending a decision on commission rates.
4. We are being told by other customers with parks in Wales that they are already cutting back on investment in parks and park infrastructure due to the uncertainty surrounding the commission rates. We fear that there will be a continued cut in such investment in the event of a change in the rate and that this will affect our business and jeopardize the jobs of our workforce, which primarily come from the Welsh Valleys.
5. Park owners have a limited amount of tools to improve their parks and the commission is a major part of that. Given the large amount of new legislation there is a fear that a lot of owners will not continue to invest and there will be an inevitable slide in standards on parks.



Our business suffered severely from the effects of the recession following the credit crunch of 2008 and we had to shed a number of staff due to poor trading conditions. It is only during the last couple of years that business has picked up. This said, margins are still very tight with material and labour costs outstripping inflation and we have had to increase the cost of our homes by 5% this year to remain profitable. We are a family business who have been in constant production for over [REDACTED] years and wish to continue for at least as long again.

We would request that you consider the effects of your decision on our business, along with other Welsh businesses which may be affected.

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

We are the park owners of [REDACTED] [REDACTED]. I am a director responding in behalf of the company. We have approximately [REDACTED] privately owned residential caravans ([REDACTED]). We have been at this site since 19[REDACTED].

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

In our view it should, at the very least, be retained at 10%. The income, whilst modest, subsidises to some extent the costs of maintaining our residential site given the very low ground rents we are able to charge. We retain grounds staff in winter who work on the residential site despite there being no income from the holiday site which is closed in that period.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

By illustration, firstly and on a confidential basis, the level of income from commission for the last 4 years is:

[REDACTED]

This amounts to a not-inconsiderable contribution to the annual overhead for the residential site.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Sporadically. The figures shown in the answer above resulted from [REDACTED] transfers in 2013/14, [REDACTED] transfers in 2014/15, [REDACTED] transfers in 2015/16 and [REDACTED] in 2016/17.

Income from commission cannot therefore be anticipated in the annual budget nor incorporated with any degree of precision in the business plan for the year.

Income from holiday pitch lettings are by far our main source of income which subsidises the residential site.

Furthermore we do not sell residential caravans ourselves any longer – the rights of occupation new owners acquire make this unattractive to us in our longer term plans for the site. Potentially also any new ‘owners’ with such rights would. Indirectly, effect negatively the value of our Park should we choose to sell it.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Payment, usually by cheque, is received from the new residential caravan owner after transfers are registered in our records

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The loss on commission would add considerably to the burden of maintaining the residential site for the reasons explained above. We are very constrained in the income we generate from ground rents (our current average charges are ██████ per week to include water rates). Unless we are able to increase ground rents significantly then we have to rely on other sources of income.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Any loss of commission would mean that we may have to reduce the hours of/ or lay off one or two grounds staff and certainly cut back on maintenance and capital projects

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

There is no evidence as far as we are aware of the sales commission affecting the mobile home owner's ability to sell. In many cases the sale is by the estate of a deceased residential caravan owner and such a charge is not queried.

Primarily however, the sale price agreed is the gross figure and market value – bearing in mind there is considerable choice for buyers in south Wales and the seller will have little or no scope for 'mark-up' on the price to allow for the commission.

It must not be forgotten that once a residential tenant is situated here they can be here indefinitely paying almost a nominal charge to us for the privilege.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

It is very difficult to supply such a detailed analysis. Certainly a residential caravan situated on a pitch at [REDACTED] is worth considerably more than the intrinsic value of the caravan. We are a coastal park in a woodland setting which, in turn, means we have high maintenance costs. A modest commission is perfectly justifiable in our view having regard to the value added to the owner.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

- 1. Loss of staff**
- 2. Less money available to maintain the site**
- 3. Less well maintained services**

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Only on a confidential basis

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Little direct impact as far as we are aware albeit the preparatory work (consultations etc.) were time consuming and the administration now involved is more than we would have liked. It could be said that the residential side of our business is no longer financially viable – we no longer sell (for the reasons explained above) and we have the burden of maintaining the residential site for extremely modest returns.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We haven't identified any impact

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no suggestions

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

None

[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B

Because the park home site owners no longer convey the sales and only have an administrative role in change of ownership and I feel a lower now would be more than adequate for this cost

- 3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.**

Not known

- 4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this**

Not known

- 5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.**

Not known

- 6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.**

Not known

- 7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.**

Not known

- 8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.**

I don't feel as a resident I would be affected by the commission however this does have to be a consideration when selling your home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Unknown

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Not known

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Not a park site owner

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Not known

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None as I feel that the Welsh language is not affected by this act

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

None

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Consultation

Response

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

**Answer: e. A representative body for park home residents
Independent Park Homes Advisory Service.**

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Answer: b. Be reduced. The present rate of ten percent is far too high and is applied to the full value of the home including value added by improvements made by the occupier. The effect of losing ten percent of the sale price of the home when selling reduces the amount that is available for the seller to purchase a new home.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Answer: Although the site owners claim that the commission is an essential part of their income, this cannot be correct because the income from commission is unpredictable. No one knows how many sales will occur during the coming year, not even the residents themselves. A resale of an occupied home may occur for a variety of reasons such as death, illness, family reasons or other unpredicted happenings. During a year, the number of resales could be any amount or nil. When a business man is calculating his budget for the coming financial year, it would not be sensible to include an unpredictable factor which could easily be zero.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Answer: This can vary tremendously. As stated in answer 3 above, the amounts received can only be treated as an unpredictable bonus and therefore cannot be incorporated into the business plan.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Answer: The park owners often claim that the income from commission is used to make improvements to the park but this is not correct. When a park owner makes an improvement to the park, the cost is usually recouped by an increase in pitch fee at the next pitch fee review in accordance with implied term 18. Every business has its ups and downs and so commission can only be considered as one of the ups because of its unpredictability.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Answer: As in the previous answers, because of its unpredictable nature, commission should not have an effect in the short term. For example, a park owner is unlikely to go bankrupt if one year passed with no sales. In the long term, a reduction in commission would inevitably result in a reduction in the overall profit margin. The park owner's representatives have previously explained the park owner's income as follows: the residents pay for their occupation of a pitch on the park in three ways, (a) the initial purchase price which could net a profit of about £100,000 GBP, (b) the regular pitch fee which is a guaranteed, inflation proof income averaging about £2,500 p.a. for each pitch, and (c) commission which site owners sometimes call an 'exit fee'. Many other businessmen would envy this income from a captive clientele. I suggest that most businessmen would be satisfied with (a) and (b) and would consider (c) to be an undeserved icing on the cake.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Answer: Unfortunately, not all park owners are fair and, in the event of the rate of commission being reduced, the unscrupulous owners would attempt to recover the lost income by an increase in pitch fees or service charges.

To prevent this, any legislation implementing a reduction must be accompanied by legislation stating that the reduction cannot be considered at the pitch fee review.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Answer: A resident selling his/her home would probably add on ten percent to the estimated value to allow for commission. This would then lead to a difficulty in selling and, after bargaining with the prospective buyer, would probably have to reduce the price in order to sell.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Answer: Although a park home has an ex-works value, without a pitch to site it on, the home would be worth very little. This why all homes are sold 'on site'. Therefore, the park owners are correct in saying that the park adds value to the home. But it must also be mentioned that a park with no homes on it would gain no income, so the homes also add value to the park.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Answer: Some consequences are explained in answers 7 and 8, Some unscrupulous park owners will try to recover the lost income by increases in pitch fees, utilities and other charges and this will cause problems and resentment between residents and owners. But the present situation where a resident has to give away ten percent of his most valuable asset, the home, to the park owner when the owner does nothing to earn it also causes resentment.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government? If so, please provide the preferred method to contact you to discuss any such arrangements.

Answer: Not applicable.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Answer: The new procedures for pitch fee review and selling the home are a major improvement in the rights of residents.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Answer: I believe that the proposed changes will have little or no effect on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Answer: I cannot see how the proposed policy can be changed to have any effect on the Welsh language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Answer: I believe the answers above have covered the subject.

Consultation Response Form

[Redacted]

Organisation: Independent Park Homes Advisory Service

[Redacted]

[Redacted]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper and identify which question your reply relates to.

1. Are you:

- a. A park owner.
- b. A representative.
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents.
- f. Other please state

Answer: e. We are the National of Park Home Residents which is a Representative Body for Park Home Residents.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other (please specify in box below)

Answer b. We believe that the Commission Rate of 10% on the resale of park homes should be reduced the reason for that answer is that commission charges was an invention created by Park Owners in the late 1950's early 1960's because park home owners were selling their caravans/mobile homes at a profit and they decided that the said profit was being made because the home was sited on their land and therefore they should have part of that profit and were charging between 20% to 30% which did not come under any form of Legislation.

Due to many concerns by home owners being made to Government sources the caravan sites act 1975 was enacted which legalized the commission and set the chargeable rate at 15% of the sale price.

Due to the rise in the selling prices of the homes and the amount of monies that park owners were receiving through sales the Government made a further reduction to 10% within the 1983 mobile homes act.

We are now 34 years from the enactment of 1983 act which means that the 10% rate is giving park owners a greater commission due to higher value on the homes further to the above the park owners make a substantial profit when selling a new home for example a home costing £70,000 from the manufacturer (less the trade discount) will be sold by the park owner for £180,000 + if that home owner then wishes to sell at a later date and the home is valued at £160,000 (as park homes when re-sold rarely make profits) they have to give the park owner £16,000 which is taken from the sellers assets and not from any profits as they have made a loss on the sale price anyway so the park owner has had a large profit of £100,000 (approx) on the original sale plus £16,000 on the resale.

It is therefore an obvious fact that the park owner is not having commission payments from any profits that the seller might have made but is taking the home owners capital which is legally permitted by the Government Statute which allows the owner to have 10% of the sale price of the home which in most cases give the home owner a capital loss and further unearned profit to the park owner which cannot be fair nor reasonable.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Answer: The amount of commission received by the park owner can only be classed as a bonus to his income as sales on the park cannot be guaranteed and are unpredictable therefore cannot be a factor to be considered as a contribution to his annual income as sales could well be nil and never know when the next sale will take place.

4. On average how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How the income incorporated into the business plan? Please provide any evidence you have to support this.

Answer: As stated above the sales are unpredictable therefore commission is not guaranteed which means that if there are no sales there is no extra income to incorporate into any financial plans.

5. How is the commission income received by the park owner used? Please give examples and provide supporting evidence where available.

Answer: There is no correct answer to this question as park owners do not disclose any information to residents as to how they spend their money apart from claiming that they cannot afford to make any improvements or carry out his responsibility of further maintenance as required so the unpredictability of the commission is also an excuse to extra charges through the pitch fee reviews.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence supporting documentation you have to support your comments.

Answer: We at N.A.P.H.R. have carried out a survey of parks in our membership to ascertain charges for pitch fees and have found that they range from £65-00 to £300-00 per month which gives an average of £136-00 per month per pitch which is guaranteed income which also is increased annually by the R.P.I. so the short term would not affect the viability of the park however if the commission was predictable then a reduction to his income through a lower commission rate could affect his profit margin but as already stated the commission being so unpredictable it could not be considered as guaranteed income in the parks financial budget therefore it can only be a bonus.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability on their site? Please provide evidence you may have to support your view.

Answer: Park Owners would state that they had the right to re-coup any lost income ie. through any reduction in the commission rate through pitch fee increases or any other charges there are many unscrupulous owners that have terms written in residents written statements giving them the right to pitch fee increases if any legislation comes into force that affects their income therefore any legislation that makes changes that reduces the commission rates must also have supporting legislation that prevents the owners from increasing pitch fees or any other means to cover their lost income.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Answer: Any seller normally would make an allowance in the selling price to cover the commission charge which makes it harder to sell.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Answer: A park home when new sells for a lot of money because of the site that it is stationed on without a pitch the home has very little value but nor has a park with no homes.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Answer: There is a lot of nasty park owners that will harass/bully/aggravate so as to make people unhappy and leave the park which gives park owner some more commission and the increase the pitch fee to the new occupant all which creates unrest and fear in residents.

All of the above creates resentment as the unscrupulous owners only think of money and have no duty of care to people.

11. Not applicable.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide evidence to support your view.

Answer: The 2013 Act has given residents better procedures and improved their rights we look forward to further improvements.

13. We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased or negative effects be mitigated

Answer: I cannot see any reason for the Welsh language to be effected in any way through the proposed changes.

14. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language and no adverse effects on opportunities for people to use the Welsh language and on treating the language no less favourably than the English language.

Answer: There is no reason for the proposed policy changes to effect the Welsh language..

15. If you have any related issues which we have not specifically addressed please use the space to report them:

Answer: I think I have covered everything in my above answers.

Consultation Response Form

[REDACTED]

Organisation: National Association for Park Home Residents.

[REDACTED]

[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous please tick here.

The Park Homes Commission Rate

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

a.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

a.

The commission rate should be retained at 10% as this is an important percentage of the park owners income, the industry has already been hit with new legislation and deductions in pitch fee reviews. We purchased our park in [REDACTED] and took in to consideration assignment fees(commission's) when calculating the return on our investment.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Over the ■■■ years We have owned the park we have received 3 commission payments totalling £20,300.
Approximate pitch fees over ■■■ years £150,000

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On average it has worked out to be just under 1 home sold per year on our park.
With only a 5.5% return on our investment, park owners find it difficult to finance the purchase of parks and very often repayments are reliant on guaranteed pitch fee, using the commission payments for the upkeep of the park.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Some of the money is used for the park maintenance/Improvements, for example towards the end of ■■■ we had 2 assignments and spent more than half the money on a road improvement scheme. We also tend to keep some money in reserve as we are responsible for the upkeep and maintenance of all the services ie. Water mains and stopcocks, electricity cables and metering equipment and the underground sewerage system, all of which by law we are unable to charge for on the supply charges.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please

provide any evidence, supporting documentation you have to support your comments.

In my opinion it will affect the park over the long term, basically it will reduce the income the park receives and therefore the amount returned back into the park. This will then have an impact on the value of the individual homes, in the long term it will affect both the park owner and the occupier. All occupiers and prospective occupiers are made aware of the 10% fee and freely accept and sign the "legal binding contract" .

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I feel there are 2 ways to mitigate the impact, firstly not to abolish the 10% commission, or secondly if you feel it is necessary to abolish it, then only abolish it on new agreements from this date on. This will allow us to raise the pitch fee on the new agreement to compensate the abolished commission.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I don't feel it affects the ability to sell the home as the funds are deducted from the sale price and not added to the sale price, hence not affecting the purchase price at all.

**9.How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

The value of the home can be multiplied tenfold by being sold on a licensed park in comparison to its offsite value (10% is a small price to pay for that). I recently purchased a home for £10,000 and sold it for £1250 offsite. I can find proof if needed.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

As mentioned above we purchased the park [redacted] years ago with the intension of expanding our business throughout [redacted] Wales. If the commission is abolished there is no doubt in my mind that I will not be looking to expand in Wales and will probably sell the park we own. The previous park owner [redacted] as he could not afford to run the park in Wales successfully. I have managed to turn the park around to the delight of all my residents but feel I could not continue to keep these standards if this income is removed. Please feel free to contact any of the residents on the park [redacted] as I am sure they will verify these facts.

11.If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

**The biggest impact has been the additional administration work involved, our admin cost's have more than doubled.
The sales procedure and paperwork is very complex for the elderly occupiers, I am always getting occupiers/estate agents and solicitors asking me questions about the forms, and very rarely receive all the necessary documents.**

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No coment

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No coment

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

No coment

**Consultation
Response Form**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

With regard to the above paper and implications of this can be summarised as follows.

It is important that Government addresses the key issues facing those who have chosen to or intend to choose Park Home living, a wider proportion of the sector will ultimately fall into the hands of rogue traders and that eventually, the industry will implode, depriving both Government and retirees of an important low cost housing option. The 2013 Act has laudably succeeded in limiting overt sales blocking,, an issue driven by The Park Home Owners JUSTICE Campaign. It also equipped Local Authorities with essential tools, however, the element that has brought the market into disrepute continue their illicit trading practices uninterrupted and so more now needs to be done. In 2013, it was advocated that the objectives were to "drive the rogues and criminals out of the sector" and whilst this is unlikely to materialise, there remain essential safeguards that must be included after the 2017 review that will both enforce greater compliance's and provide clear disincentives to exploitations.

Where a site owner is evidenced by a Local Authority or Authorities to be unfit, it should make application to a Court seeking suspension of the license and it's transfer to a reputable private sector organisation experienced in the managed of tenanted estates with operating costs drawn from the sites revenue stream, the license returned to the site owner only after a probationary period with agreement by the Court. Conferred responsibilities of all Local Authorities protective services should no longer be an option, but a statutory duty. There should also be an implied requirement that Local Authorities formally exchange intelligence and the facilitate joint actions where rogue site owners operate cross-county.

ALL site owners should be required to enable the independent metered supply of ALL UTILITIES, offering competitive market choices to all occupiers, a right available to almost all other home-owners.

ALL site owners should be required to allocate a proportion of received pitch fees into a sinking fund, where annual maintenance and repairs are agreed between majority residents and the site owners. Where site owner financial irregularities are evidenced to be involved, the 1st Tier Tribunal, which has no powers of direct enforcement, should be required to refer the Application for hearing at a County Court.

There is also other anomalies in the industry, namely the misleading sales of new homes, the removal of the opportunity for unlawfully imposed utility, intentional negligences in site repairs and maintenances and improved access to early justice in the event of financial abuses.

Of course such measures are likely to be opposed by the industries representatives, and who, if they are at all serious in seeking to protect the sector from what they assert are minority exploitations, could not viably object to such measures - where they similarly argue that the site owners which include the rogues, should remain

entitled to a 10% sales commission, regardless the devaluation home-owners assets, as a consequence of their negligences, intended for longer-term gain.

A not insignificant part of the industry is based upon the effective selling of aspirations under false pretences by con merchants and the exploitation of those who fell for the well rehearsed patter taken from the same book "How to get Richer At The Expense of the Unwitting and Vulnerable".

We need your interest and input into the 2017 review and its outcome.

As an example pitch fee

[REDACTED]

These figures are conservative estimate of average income.

[REDACTED]

Mr [REDACTED] owns approximately [REDACTED] parks.

We are aware that our park owner has diverse business interests, one of them being [REDACTED], yielding further income. [REDACTED]

Therefore bankruptcy in the event of the loss of 10% sales commission is unlikely.

Since sales blocking by park owners was quashed by the Mobile Homes (Wales) Act 2013, other means of interfering in a sale have been devised by unscrupulous owners. When involved, by some mischance, in the purchase of a park home by a potential buyer, and the buyer has a choice of homes owned by park residents wishing to move away, or homes owned by the park owner himself, the park owner will intimidate the buyer into purchasing from himself by other means. One strategy is to refuse to allow the buyer, for example, the opportunity to bring a pet dog or cat with them to the park, refuting this, or any other attractive condition of sale advertised in his general publicised sales literature, to suit his purpose.

Another way in which the 10% commission charge has been known to be abused, is for the park owner to receive his 10% commission following the sale of a home to a new resident, then harass and intimidate the new owner to the extent that he or she simply puts the recently purchased home on the market to get away. The park owner then collects another 10% commission. A nice little earner.

The level of pitch fee payments is based on historical conditions. Since the original pitch fee for an individual park home was set, however long ago, it may only be increased (annually) by the rate at which the CPI (formerly the RPI, prior to the Mobile Homes (Wales) Act 2013) increases. To attempt compensatory pitch fee increases would not be possible under these conditions, nor fair to the agreement under which any individual buyer originally purchased the home.

We are aware of a [REDACTED] park owner attempted [REDACTED] to intimidate some residents of older properties into increasing their pitch fee to an exorbitant amount suggested by himself. In one instance the home owner quite legitimately refused, under which conditions the park owner should have adhered to the procedure cited in the Mobile Homes Act 1983 and subsequent Housing Act amendments 2004, should an occupier not agree with the proposed new pitch fee. Briefly, the increase in pitch fee is a proposal, and if the home owner does not agree, he is considered to be 'in dispute', in which case he will continue to pay the existing rate until such time as the 'dispute' is settled either between the two parties or by a court (now a tribunal, instituted in 2012).

The park owner refused to enter into negotiation according to the law, and consequently the home owner did not pay any increased pitch fee for [REDACTED] years until the park owner demanded, via a solicitor's letter, a sum of slightly less than [REDACTED] [REDACTED] pounds 'arrears' for the missed payments, when in fact the home owner was lawfully 'in dispute'. A response to the solicitor by letter from the home owner, composed with the assistance of neighbours, pointed out the illegality of the situation and legitimately refused payment of the sum demanded. On sight of the letter and the legal conditions cited therein, the solicitor (obviously interested only in their fee, and pathetically incapable of researching an area of legislation with which he/she was unfamiliar), advised the client that there was no hope of recouping any payment. The relevant pitch fee increase was correctly reinstated according to CPI regulations from the point at which it had become fixed ten years previously, the park owner thereby losing several years' additional income through his own determination to ignore procedures set out in current legislation. We understand that other home owners approached in the same way at this time submitted to the threats and accepted increased charges.

We dispute that the 10% commission is 'tied into the whole economics of park homes'. A resident may live on a park for 3 or 30 years and it would be impossible to include commission charges as a calculable income for the purpose of preparing a business plan. It is merely a perk devised by the park owner for the park owner when residential park home occupation evolved from holiday caravan businesses many years ago.

Carl is requesting residents views on the 10% issue, obviously to abolish this sales tax would be the perfect solution, but if a compromise with the site owners is the only way forward, please consider the following.

Base the sales commission, on the difference between the purchase price of a home, and the selling price.

Purchase Price £ 120,000,

Selling Price £140,000,

Gain to Resident £20,000,

10% sales Tax £2,000 To site owner,

You are still giving the site owners 10% commission, which considering they no longer have any input in the sales process, is basically unearned income. Introduce this proposal for a five year period, and STRESS that no alteration to the excellently drafted Welsh 2014 Mobile Homes Bill would be tolerated. I trust my proposal may balance out the “ set in stone” views you will be receiving from both Site owners and Park residents.

As a park home owner I am confused and somewhat unhappy to say the least as to why we, as residents have less rights than those people who reside in bricks and mortar.

I have personally lived in bricks and mortar that was a leasehold property. The leaseholder was not responsible for the water/ sewerage etc. That was my responsibility.

On the sale of my home I was NOT required (quite rightly so) to pay the leaseholder 10% of the sale price. I certainly was NOT responsible for the income of the owner of my bricks and mortar property in so much that I had to pay 10%of the house sale (or any monetary input other than an annual ‘pepper corn’ rent), to keep his business viable!!

A site owner has absolutely NO input into the selling process, financial or otherwise, as long as the new owner fits the park residential criteria, i.e. over 50 yrs of age etc. The park owner receives a monthly rent, plus water sewerage and maintenance fees from whoever owns the park home. These payments are infinite for the duration of the site /business existence.

The park home resident is responsible for the upkeep and maintenance of THEIR home and residential plot.

When a park home has reached its ‘end of life’, usually when a resident passes, the site owner often agrees a monetary settlement, (usually in his favour, with the family for the home, NOT the plot. A ‘new’ park home is purchased by the site owner and re-sited at a considerable profit (anyone can source the price of a park home) and sold on to new residents.

Can you answer one question please? Why must we, as park home residents, be responsible for the income/success of a business? A business that cannot / will not /have not produced impartial validated accounts to justify this charge?

I have yet to see or hear of a park site owner who is 'scraping' through. Their lifestyle says it all if anyone cares to investigate. If this type of 'business' is so poorly paid why do so many remain in this field of industry??

I would like to see the public response to legislation that tried to implement such a charge on the sale of bricks and mortar.

I moved [REDACTED] to this Park Home site, and was very happy here. I paid commission to the owner under the false impression this money was for any repairs to my pitch or site, I still have [REDACTED] cracks on my pitch. The access road is full of potholes, the building housing the electricity is a sight for sore eyes. A grassed area was cleared to be replaced by stone chippings but no stones were laid now it is full of weeds. The site sign is falling down rotten. These things have been pointed out to the owner with no results. At least [REDACTED] homes have been sold since I moved in so what has he done with the commission? That is why we want it abolished.

Of course there is always a get out for these people they just pass the sites on to other family members who then form a new company.

Many of the homes that go up for sale are sold by relatives after the death of their loved ones and are at the mercy of the site owner who buys it cheap and sells it at market value. [REDACTED]

We act in the capacity of specialist Chartered Surveyors, Valuers and Agents in the sale, valuation, acquisition and provision of consultancy services in respect of holiday and residential park home estates across the UK. Go to [REDACTED]

In the context of the residential parks market as a whole, there has been prolonged debate about the uncertainty of a change in commission rate charges and therefore any successful challenge by the Welsh Government to reduce or abolish the current 10% commission rate entitlement would have a negative impact across the UK market as a whole and presumably lead to a further amendment of the Mobile Homes Act 2013.

Sustainability of residential parks in Wales is potentially at greater risk as generally some of the Parks are in secondary locations and therefore compete directly with the local housing market and thus the margins on the sale of individual park homes are below the national average. Therefore, a loss or reduction in assignment commission would have a negative impact on the viability of this type of property investment. The knock-on effect would be a potential deterioration in the level of site maintenance, improvements, investment and management services.

Whereas I fully appreciate the cause and effect of updating the 1983 Act to the provisions of the 2013 Act was driven mainly by moral issues, I believe tampering

with the assignment commission is a commercial issue. Inevitably, this would lead to a general reduction in the standard of care and maintenance of Park Home Estates as site operators will not be in a position to offset rising costs against a reduction in the income stream. On a straight line pitch fee income only basis, the return on this type of capital asset is relatively modest and sporadic top up income from assignment commissions is a useful source of revenue to offset routine overheads and a sinking fund for reinvestment.

I believe the Welsh Government together with the Residents Association lobby should consider the wider picture and think about the importance of maintaining the integrity, standard, reputation and quality of the park home estate environment as a whole and after all, such factors impact on the resale value of individual homes. Surely, that is in everyone's interest?

To further illustrate the point, I manage a Park Home Estate on behalf of [REDACTED]. It comprises a mature retirement style Estate for [REDACTED] homes with mainly elderly residents. At the time of purchasing the Park, my clients were made aware of a residents' association and soon after taking over the business we engaged in a proactive relationship with the residents and the association members. We immediately set about undertaking general cosmetic improvements and discretionary expenditure at no cost to the residents. We maintain a very positive relationship with the residents and plan further upgrading merely to improve the living environment for the residents including routine maintenance and management services. All of this is only viable by reinvesting part of the park income and therefore the discretionary expenditure is a commercial decision and is only sustainable if the business is generating a realistic yield to allow for reinvestment and upgrading. It is worthy of note since the purchase of the Park in [REDACTED] there have not been any home sales or assignment commissions, in which case all site improvements, upgrading and maintenance are out of the site operator's private funds or the pitch fee income alone.

Whereas there is a provision within the Mobile Homes Act to offset legitimate site improvements by upward adjustments in rent, however, many of the routine operating overheads are trading costs and cannot be passed on and therefore in the spirit of maintaining a high quality living environment the majority of professional operators absorb the costs and take a great deal of pride in the reputation of the Estate.

In closing, the provisions of the Mobile Homes Act 2013 are bedding in but fundamentally the feedback from the sector is that the revised legislation is unworkable and has led to an erosion of a site operator's authority to manage the business and monitor the assignment process. It will give rise to discord and discontent and some residential park operators are moving out of the sector for these reasons.

We are instructed in the sale of a Park Home Estate in [REDACTED] Wales and a deal was proceeding until the buyer was made aware of the consultation process and wanted to delay the purchase until the outcome is known. For that reason, the deal has collapsed due to the delay. We consider the market for Park Home Estates in Wales will continue to falter until the process is resolved. Clearly, a negative outcome of the

consultation process will deter buyer interest in the sector and inevitably lead to a fall in market value.

We hope this reply is helpful and we consider the commission on the resale of Park Home Estates in Wales should be retained at the current 10% level.

It's really difficult to give reasons to abolish this fee as its utterly ridiculous that it exists.

Would anyone, anywhere give 10% of the proceeds of their home away.....for what??

We sadly are trapped in this bizarre situation, how in the name of God can it be justified. We pay rather large site fees for not too much in return but we are in this predicament as many of us cannot afford to stay, or not able through health problems, in the homes we have.

I'm not a complainer , we the older generation put up and shut up. We have, all our lives, paid our dues, our taxes and have helped this country in any way we could, now it would be great if this country could help us out and relieve us of this burden. We ask you please to eradicate this ridiculous burden heaped upon us by park owners.

No one at all (other than park owners) would condone this daylight robbery, it should be made illegal, there seems to be absolutely no possible justification for this fee, in fact no effort at all, other than banking the 10% , is made in return for it.

Local authority

The implementation of the Mobile Homes (Wales) 2013 has undoubtedly raised residents expectations as to what the Council can do to assist them. Most complaints from residents relate to the terms of occupation agreements and site rules over which the Council has no power to intervene. Unfortunately, residents fail to understand this and then vociferously complain about the perceived indifference and unhelpfulness of the Council.

I have received representations from several site owners in connection with the sale commission on park homes. The consensus is that the 10% commission reflects the fact that the plot and amenities of the park add to the resale value of the home. For example, I am aware of an older park home which recently sold for £19,000. However, if this particular home was sold off-site it would struggle to achieve £1,000. It has been impressed upon me that considerable investment is necessary to develop and maintain a residential park home estate. A reasonable return on this investment is essential to ensure that the park continues as a viable concern in the interests of both the home and park owners. All park owners concerned have stated that if the commission rate was abolished they would have to increase pitch fees by 20% and may even consider disposing of their sites or redeveloping them.

With regard to the above paper and implications of this can be summarised as follows.

It is important that Government addresses the key issues facing those who have chosen to or intend to choose Park Home living, a wider proportion of the sector will ultimately fall into the hands of rogue traders and that eventually, the industry will implode, depriving both Government and retirees of an important low cost housing option. The 2013 Act has laudably succeeded in limiting overt sales blocking,, an issue driven by The Park Home Owners JUSTICE Campaign. It also equipped Local Authorities with essential tools, however, the element that has bought the market into disrepute continue their illicit trading practices uninterrupted and so more now needs to be done. In 2013, it was advocated that the objectives were to "drive the rogues and criminals out of the sector" and whilst this is unlikely to materialise, there remain essential safeguards that must be included after the 2017 review that will both enforce greater compliance's and provide clear disincentives to exploitations.

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Mobile Homes (Wales) Act 2013) increases. To attempt compensatory pitch fee increases would not be possible under these conditions, nor fair to the agreement under which any individual buyer originally purchased the home.

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The park owner refused to enter into negotiation according to the law, and consequently the home owner did not pay any increased pitch fee for [REDACTED] years until the park owner demanded, via a solicitor's letter, a sum of slightly less than [REDACTED] pounds 'arrears' for the missed payments, when in fact the home owner was lawfully 'in dispute'. A response to the solicitor by letter from the home owner, composed with the assistance of neighbours, pointed out the illegality of the situation and legitimately refused payment of the sum demanded. On sight of the letter and the legal conditions cited therein, the solicitor (obviously interested only in their fee, and pathetically incapable of researching an area of legislation with which he/she was unfamiliar), advised the client that there was no hope of recouping any payment. The relevant pitch fee increase was correctly reinstated according to CPI regulations from the point at which it had become fixed ten years previously, the park owner thereby losing several years' additional income through his own determination to ignore procedures set out in current legislation. We understand that other home owners approached in the same way at this time submitted to the threats and accepted increased charges.

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Gain to Resident £20,000,

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As a park home owner I am confused and somewhat unhappy to say the least as to why we, as residents have less rights than those people who reside in bricks and mortar.

I have personally lived in bricks and mortar that was a leasehold property. The leaseholder was not responsible for the water/ sewerage etc. That was my responsibility.

On the sale of my home I was NOT required (quite rightly so) to pay the leaseholder 10% of the sale price. I certainly was NOT responsible for the income of the owner of my bricks and mortar property in so much that I had to pay 10% of the house sale (or any monetary input other than an annual ‘pepper corn’ rent), to keep his business viable!!

A site owner has absolutely NO input into the selling process, financial or otherwise, as long as the new owner fits the park residential criteria, i.e. over 50 yrs of age etc. The park owner receives a monthly rent, plus water sewerage and maintenance fees from whoever owns the park home. These payments are infinite for the duration of the site /business existence.

The park home resident is responsible for the upkeep and maintenance of THEIR home and residential plot.

When a park home has reached its ‘end of life’, usually when a resident passes, the site owner often agrees a monetary settlement, (usually in his favour, with the family for the home, NOT the plot. A ‘new’ park home is purchased by the site owner and re-sited at a considerable profit (anyone can source the price of a park home) and sold on to new residents.

Can you answer one question please? Why must we, as park home residents, be responsible for the income/success of a business? A business that cannot / will not /have not produced impartial validated accounts to justify this charge?

I have yet to see or hear of a park site owner who is ‘scraping’ through. Their lifestyle says it all if anyone cares to investigate. If this type of ‘business’ is so poorly paid why do so many remain in this field of industry??

I would like to see the public response to legislation that tried to implement such a charge on the sale of bricks and mortar.

I moved [REDACTED] to this Park Home site, and was very happy here. I paid commission to the owner under the false impression this money was for any repairs to my pitch or site, I still have [REDACTED] cracks on my pitch. The access road is full of potholes, the building housing the electricity is a sight for sore eyes. A grassed area was cleared to be replaced by stone chippings but no stones were laid now it is full of weeds. The site sign is falling down rotten. These things have been pointed out to the owner with no results. At least [REDACTED] homes have been sold since I moved in so what has he done with the commission? That is why we want it abolished.

Of course there is always a get out for these people they just pass the sites on to other family members who then form a new company. Many of the homes that go up for sale are sold by relatives after the death of their loved ones and are at the mercy of the site owner who buys it cheap and sells it at market value. [REDACTED]

We act in the capacity of specialist Chartered Surveyors, Valuers and Agents in the sale, valuation, acquisition and provision of consultancy services in respect of holiday and residential park home estates across the UK. Go to [REDACTED]

In the context of the residential parks market as a whole, there has been prolonged debate about the uncertainty of a change in commission rate charges and therefore any successful challenge by the Welsh Government to reduce or abolish the current 10% commission rate entitlement would have a negative impact across the UK market as a whole and presumably lead to a further amendment of the Mobile Homes Act 2013.

Sustainability of residential parks in Wales is potentially at greater risk as generally some of the Parks are in secondary locations and therefore compete directly with the local housing market and thus the margins on the sale of individual park homes are below the national average. Therefore, a loss or reduction in assignment commission would have a negative impact on the viability of this type of property investment. The knock-on effect would be a potential deterioration in the level of site maintenance, improvements, investment and management services.

Whereas I fully appreciate the cause and effect of updating the 1983 Act to the provisions of the 2013 Act was driven mainly by moral issues, I believe tampering with the assignment commission is a commercial issue. Inevitably, this would lead to a general reduction in the standard of care and maintenance of Park Home Estates as site operators will not be in a position to offset rising costs against a reduction in the income stream. On a straight line pitch fee income only basis, the return on this type of capital asset is relatively modest and sporadic top up income from

assignment commissions is a useful source of revenue to offset routine overheads and a sinking fund for reinvestment.

I believe the Welsh Government together with the Residents Association lobby should consider the wider picture and think about the importance of maintaining the integrity, standard, reputation and quality of the park home estate environment as a whole and after all, such factors impact on the resale value of individual homes. Surely, that is in everyone's interest?

To further illustrate the point, I manage a Park Home Estate on behalf of [REDACTED]. It comprises a mature retirement style Estate for [REDACTED] homes with mainly elderly residents. At the time of purchasing the Park, my clients were made aware of a residents' association and soon after taking over the business we engaged in a proactive relationship with the residents and the association members. We immediately set about undertaking general cosmetic improvements and discretionary expenditure at no cost to the residents. We maintain a very positive relationship with the residents and plan further upgrading merely to improve the living environment for the residents including routine maintenance and management services. All of this is only viable by reinvesting part of the park income and therefore the discretionary expenditure is a commercial decision and is only sustainable if the business is generating a realistic yield to allow for reinvestment and upgrading. It is worthy of note since the purchase of the Park in [REDACTED] there have not been any home sales or assignment commissions, in which case all site improvements, upgrading and maintenance are out of the site operator's private funds or the pitch fee income alone.

Whereas there is a provision within the Mobile Homes Act to offset legitimate site improvements by upward adjustments in rent, however, many of the routine operating overheads are trading costs and cannot be passed on and therefore in the spirit of maintaining a high quality living environment the majority of professional operators absorb the costs and take a great deal of pride in the reputation of the Estate.

In closing, the provisions of the Mobile Homes Act 2013 are bedding in but fundamentally the feedback from the sector is that the revised legislation is unworkable and has led to an erosion of a site operator's authority to manage the business and monitor the assignment process. It will give rise to discord and discontent and some residential park operators are moving out of the sector for these reasons.

We are instructed in the sale of a Park Home Estate in [REDACTED] Wales and a deal was proceeding until the buyer was made aware of the consultation process and wanted to delay the purchase until the outcome is known. For that reason, the deal has collapsed due to the delay. We consider the market for Park Home Estates in Wales will continue to falter until the process is resolved. Clearly, a negative outcome of the consultation process will deter buyer interest in the sector and inevitably lead to a fall in market value.

We hope this reply is helpful and we consider the commission on the resale of Park Home Estates in Wales should be retained at the current 10% level.

It's really difficult to give reasons to abolish this fee as its utterly ridiculous that it exists.

Would anyone, anywhere give 10% of the proceeds of their home away.....for what??

We sadly are trapped in this bizarre situation, how in the name of God can it be justified. We pay rather large site fees for not too much in return but we are in this predicament as many of us cannot afford to stay, or not able through health problems, in the homes we have.

I'm not a complainer , we the older generation put up and shut up. We have, all our lives, paid our dues, our taxes and have helped this country in any way we could, now it would be great if this country could help us out and relieve us of this burden. We ask you please to eradicate this ridiculous burden heaped upon us by park owners.

No one at all (other than park owners) would condone this daylight robbery, it should be made illegal, there seems to be absolutely no possible justification for this fee, in fact no effort at all, other than banking the 10% , is made in return for it.

Local authority

The implementation of the Mobile Homes (Wales) 2013 has undoubtedly raised residents expectations as to what the Council can do to assist them. Most complaints from residents relate to the terms of occupation agreements and site rules over which the Council has no power to intervene. Unfortunately, residents fail to understand this and then vociferously complain about the perceived indifference and unhelpfulness of the Council.

I have received representations from several site owners in connection with the sale commission on park homes. The consensus is that the 10% commission reflects the fact that the plot and amenities of the park add to the resale value of the home. For example, I am aware of an older park home which recently sold for £19,000. However, if this particular home was sold off-site it would struggle to achieve £1,000. It has been impressed upon me that considerable investment is necessary to develop and maintain a residential park home estate. A reasonable return on this investment is essential to ensure that the park continues as a viable concern in the interests of both the home and park owners. All park owners concerned have stated that if the commission rate was a abolished they would have to increase pitch fees by 20% and may even consider disposing of their sites or redeveloping them.

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C Park Home Resident Owner.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B&C Abolished preferably but certainly reduced.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I have no idea if it does contribute to overall income.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

To my knowledge three pre-owned park homes sold in last six months. No knowledge whether commission income received by site owner.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

No knowledge of question 5.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

No knowledge of question 6.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

No knowledge of question 7.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

No knowledge of question 8.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The value is in not having to move from site for a period of 2/12 months every year.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

May make selling park homes easier.

How it will affect attitude of site owners is not known.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Yes in writing or by telephone I have no E-mails or anything with technology.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Clearer instruction and information state in writing.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

As site owners are English on my site not sure if the Welsh language has any consideration.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

As above.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

Park Home Resident Owner.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be abolished.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We have no idea – But based on the number sold in the last [REDACTED] since we have lived here, maybe only 2 or 3 have been sold so not a very big contribution to the site owner.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

No body can even make a guess at the answer to this question! But certainly on [REDACTED] where we are, very few over the last [REDACTED], 3 residents have died and one went into a care home.

Ill health, Disability or the loss of a partner, would be the main reasons for residents to have to sell their homes, but would only receive 90% of its value to buy somewhere else.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

How the commission is received by the park owner is something we haven't had to deal with yet.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

It shouldn't make any difference, as the commission paid is NOT spent on the park itself. The park owners charge a pitch fee which is paid monthly by every home owner and this fee is increased every year.

This is for having our home on their land, but we have paid in full price for our homes from new, so to live here incurs this extra cost. Where else do you have to give someone 10% of the amount you sell your property for when nobody has acted on your behalf to sell it? If a home is left unoccupied the site owner does not maintain the plot until new residents take over.

So none of the previous owners 10% is used to keep the plot tidy. Strictly speaking the plot belongs to the site owner and is their responsibility. Families of deceased residents may live miles away and cannot maintain the plot, gardens etc until the home is sold. They shouldn't be expected to either as the site owner will be paid 10% commission when the home is sold.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

The site owners should be made to provide you with their accounts to show that they need the 10% commission, if they don't or won't, it shows they have something to hide and they should have to face the abolition of the 10% commission.

The 10% commission is not being used to improve the park. This is a reasonably new park compared with some in the country and all the homes are well maintained by the owners and relatively new.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The payment of commission by a new occupier would be the same as any occupier, should they decide for any reason to sell & go elsewhere they would be liable for the 10% commission too.

The payment of 10% commission should be explained to all prospective buyers of a park home before the sale is made, instead of finding out about it only by reading the contract after moving in.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

A park home has to be on a pitch for electricity, gas, water etc – but a pitch fee is paid for this purpose each month. The occupier pays separately for gas, electric water, council tax as do owners/tenants of ordinary houses.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The majority of parks like [REDACTED] are for retired people, on fixed incomes and this charge is an example of an amount having to be paid by most vulnerable people – the elderly.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

If they won't, then ask them why they won't!! It's money for nothing, sheer profit on behalf of the site owners and greed.

They (The site owners) should if they want to oppose the abolition of the 10% commission, be forced by law to produce their published accounts.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Very little as far as we can see.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We can't see what effects the changes would have on the Welsh language, except that maybe it would be a feather in the cap for Wales if the Welsh Government would take a lead on this issue and abolish this very unfair extra charge.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

If Wales took the initiative more people contemplating buying a park home would want to come to Wales and in so doing, Wales would reap the benefits.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

NONE

**Consultation
Response Form**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C) A Park Home Resident (Owner).

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Be abolished.

██████ do nothing to sale your home so why should they be intitalled to 10% of my money needed for nursing or care?

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

None
Maybe to buy another helicopter?

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

When someone needs nursing home.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Do not know?

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Do not know of care required in the future?

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Lots of spare plots. Maybe work harder at selling more homes.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I have no evidence, as not sold my home, I have to look to the future. Need to know that I can sell with out penalties to the new owner as every penny counts towards any care needed in future.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

None

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

I am not getting any younger. I think 10% should be abolished as it is something that [REDACTED] have not earned. Also every new home sold has different amounts. Amounts of ground rent ranging from [REDACTED] per month also we pay council tax on our properties. We think [REDACTED] are very unfair on Sale of our Homes.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

I think they should?

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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I am increasingly worried about my home becoming negative equity. If I can't sell my home because of 10% off my sale of home this will give me less for my pot for care.

I become dependent on the welsh goverment and much needed wonderful N.H.S which puts a drain on the system!

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Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

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- f. Other, please state**

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2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
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- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. - Be abolished.

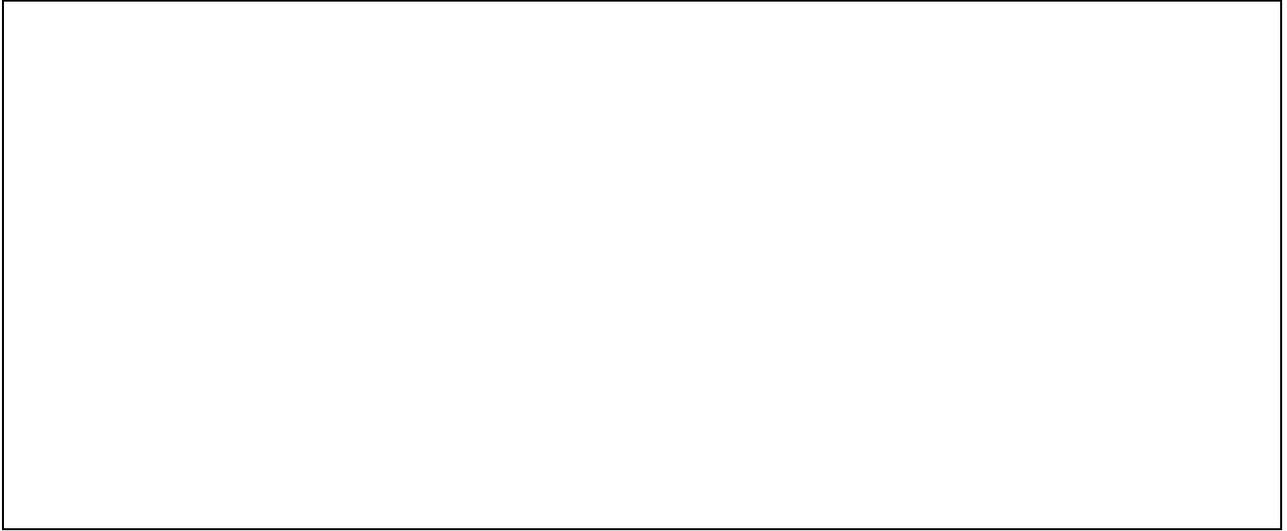
The site owner is no longer involved in the sale. Owners selling their park homes through an Estate Agent pay commission to that Agent.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

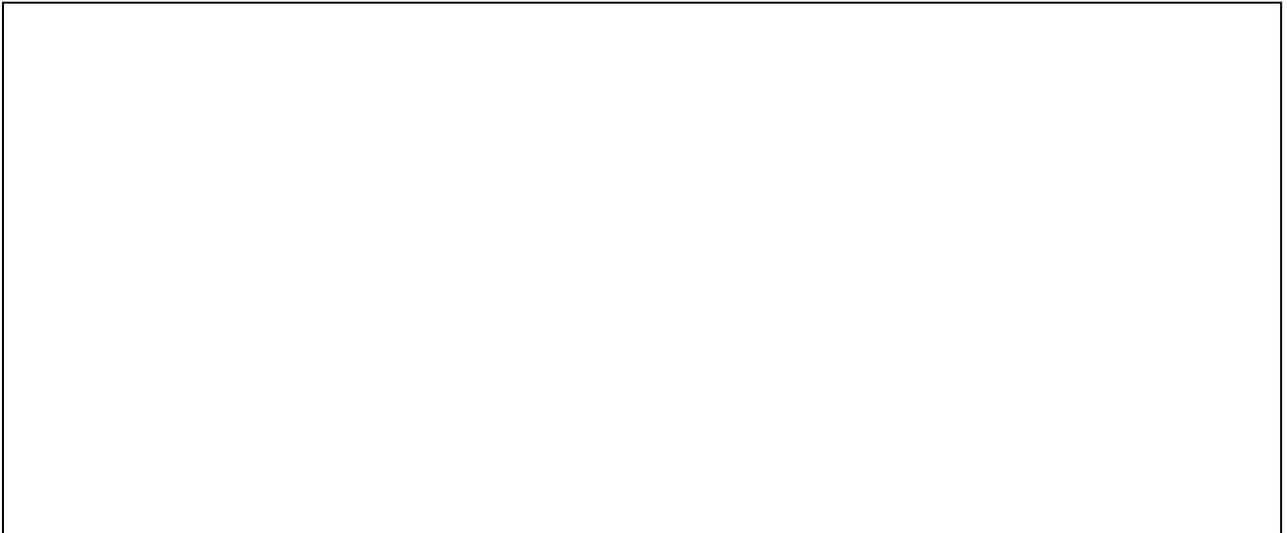
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5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number:

Your address: [REDACTED]

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Answer:

C) A Park Home Resident (Owner).

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. - Be abolished.

The site owner does nothing to earn his commission. It is money for nothing.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Don't know. It depends on how many people sell up or die.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

██████████ I have lived here for ██████████ & to my knowledge only 2 second hand homes have been sold. We don't know how income is incorporated.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Some of the income has been used to tarmac roads. Not much other work done.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The business should be based on Rental Income only.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Through last transactions only thus avoiding vat & overcharging for fencing ect.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

To sell my park home I would have to add [REDACTED] to the price, as my home cost [REDACTED] thus affecting my prospects of selling.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

How can you have a park home not sited on a pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

There is no need for this commission as he makes huge profits on sales of both new & old park homes & water.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Given much more protection to Residents.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

In my opinion this would have no affects.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

English incomers would be encouraged to learn Welsh.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

In my opinion park owners overcharge for homes & work done. Also we have been told several lies which have resulted in costing us several extra amounts of money.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number:

Your address: [REDACTED]
[REDACTED]

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

<p>Answer:</p> <p><u>C</u></p>

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

<p><u>C</u></p> <p>It is a difficult one to answer as to where this charge came from in the first place, and what is its purpose, with the site, in my opinion being very low maintenance, so what purpose does it serve, I just have no idea, but to create divisions between a seller and a buyer, or a buyer and a seller, and a practice for the twenty first century that seems so draconian and out of step to this day and age. I and my long term partner took early retirement [REDACTED], and paid an awful lot of money [REDACTED] that we had worked hard for to buy the home that we have, [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]. So again I go back to my point, a commission for what, for me to do all the footwork, along with all the expense to reach the point of sale, to hand over another 10%. I suppose the point that I am trying to make is yes, it was something that I signed up for in the beginning, but I need to take into account my</p>
--

age, along with my circumstances at the time and accept that I am not as sharp as perhaps I was in the past. It is a situation that I alone am responsible for, but that is not to get away from the fact that it does not bother me, because it does, it is my home, but it never fully feels my own, there is this cloud hanging over me, a cloud that I tell no one about, not to my children, or friends, because I am too ashamed, and embarrassed to say that this is the deal that your dad, or friend signed up to in the first place. I would also like to say should the charge be stopped or altered in any way then that would not be limited to just future sellers/buyers, but to include present park home owners also, because if that were the case, it would only serve open up even more division.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

In the short term I feel not a great deal.

In the long term I feel it could only be a good thing and would increase the demand with plots not lying empty for long length of time.

I am sorry that I have no evidence.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

With the park owner taking a more forward approach with the demand that would open up with people not afraid to put their homes up for sale, so more sales more opportunities with new sales of homes.

A new vibrant atmosphere and not a dead and dissipating being!!

This is just my view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I feel that it is without any doubt to be the number one obstacle that would stand in the way for me.

I can only speak for myself.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

A positive chance of selling it on to someone, but then we come back to the 10% service charge where for me all roads lead.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

See my answer to question seven.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

A great more peace of mind.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

This question is a little above me, but I cannot see that it would have any, as I am only at the mercy of myself.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Thank you for bringing this matter to light, whoever brought it about in the first place and to bring it this far has my admiration. the form has been a challenge for me and it has taken some time but I have to say that I have really quite enjoyed it.

Thank you again.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

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- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

Park Owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Abolished.

The site owner has no impact in sale of a park home it is done privately through the owner or estate agent.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Question not known.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On every park home sale the site owner receives commission to date 4 homes have been sold with commission this year.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not known

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Sales will in proof with considerable financial saving.

No evidence.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not known.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Substantial saving on sale of property.

No evidence available.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Minimal value.

Cannot provide evidence.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Not known

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

No

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Less sales.

No evidence available.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Not known.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Not known

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Our site has no [REDACTED] also no [REDACTED] and no maintenance of [REDACTED].

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): [REDACTED]

email / telephone number: [REDACTED]

Your address: [REDACTED]

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 - c. A park home resident (owner)**
 - d. A park home resident (tenant)**
 - e. A representative body for park home residents**
 - f. Other, please state**

Answer:

Park Home Resident (Owner)

- 2. Should commission on the re-sale of park homes in Wales:**

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Be reduced (to 5%)

Park homes should benefit (as traditional houses do) Re increase in Value – 10% does not inspire improvement of park homes. Estate agents – charge up to 3% only (at 5% park owners still get more re-sale).

A reduction in commission could mean more sales for the owner.

50 yrs+ people wish to be flexible & mobile re moving home.

- 3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.**

N/A

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

N/A

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

A reduction in commission – would open up the buying & selling of park homes making them more attractive to buyers & sellers alike.

Sales could well go up as a result.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

“Housing” has very much a buying/selling mentality. Park home selling should be encouraged a reduction would do this.

Life does not “begin to end” at 50 home owners still wish to be able to think more of their park home as an asset as if it was brick built.

The more sales on park homes means more will be improved thus enhancing the park home site.

11. If you are a park owner, would you be prepared to share detailed information on your park’s accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

N/A

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh

language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number:

Your address: [REDACTED]

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Dear Sir or Madam,

My husband and I received a form on Park Home commission rates. Having looked online at the questions set out, we feel they were more targeted for the Park Homes owner, not the residents.

We feel that the questions should put in easy to answer questions of the 10% commission to the people who own their homes. The park homes owners will never lose out as they also charge the residents a monthly rent.

When people buy homes other than park homes – such as brick builds, they would probably not buy if they were told that there was a 10% commission.

We feel this is a high price for the over 50's for living in a park home.

Dear Commission,

With regard to the 10% charged on the re-sale of park homes.

House builders i.e. Bovis, Wimpy, Persiommon etc. sell their homes outright with no commission on re-sale, so why us?

Park owners profit greatly from the initial sale with a mark up of between 40 – 60% more than the price they pay (please find enclosed [REDACTED] Leaflet with prices paid by park owner & price charged to me, being Ex works £[REDACTED] If I sell the car I drive to someone else I do not have to pay commission to the dealer from whom I purchased, the 10% is a joke & must be stopped as they make a fortune on sale & ground rent.

Couple the 10% commission with ½% estate agents fee based on todays value of £145,000 is £14,500 to park owner & £2,900 to estate agent, Total £17,400 this will not leave enough for re-purchase of another home.

Most of Park Home sites seem to be run by [REDACTED] who see us home owners (retired) as captive cash cows ripe for milking every which way, this has to stop.

To sum up profit from sale of new properties plus the high ground rents is more than sufficient to keep them in continuous profit.

I do hope you come to a sensible conclusion as this our last chance to break free from this extortion.

Yours sinerely,

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C) Park Home Resident (Owner) [REDACTED]

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C) Be abolished, but at the same time do not expect any loss to the park owner to be recovered through increased plot fees. The whole idea of the 10% is outrageous.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Unable to provide an answer to this.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

There is a low turnover of pre-owned homes on this park. No knowledge of income to owners.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Unable to answer this question.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Unable to say how the commission is used on this Park.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Most certainly not by switching any possible loss on to pitch fees.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The loss of 10% to the average home seller would have a huge impact on their future plans.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Impossible to say.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Already explained.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Not Applicable.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Cannot comment.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Cannot comment.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Cannot comment.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

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[REDACTED]

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 - c. A park home resident (owner)
 - d. A park home resident (tenant)
 - e. A representative body for park home residents
 - f. Other, please state

Answer:

C) Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C) We pay ground rent every month so I do not see why we should pay (Estate Agent) and park owner. We would after to pay park Owner over £15,000 that is a rip off.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We have a few park homes for sale at the moment and they will sale it will go in his bank account.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

We have the grass cut [REDACTED]. We have no street lights so that's the only thing he does on this site.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

None.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

When you tell people they have to pay 10 percent it puts people off buying your property.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

If we pay the 10 percent, we will not have enough money to bye anything else, we have tried to sell [REDACTED] so I would like to move back to [REDACTED] but I would not have enough to bye with estate agents and the 10 percent.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I hope you keep on fighting because we are being taken for a ride. We also have to buy our electric from the owner. We did not no any off this when we came.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We would not complain because he would make your life very unhappy.

**Consultation
Response Form**

Your name: ██████████

Organisation (if applicable):

email / telephone number:

Your address: ████████████████████

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Dear Sirs,

I feel that now is a relevant time to air my concerns relating to [REDACTED] – a residential retirement park in [REDACTED]. I have [REDACTED] seen it go from bad to worse with the residents constantly on edge awaiting the next 'event'.

I realise that the current focus relates to the maximum commission rate of 10% currently chargeable on the sale of every park home but consider that numerous other areas are of equal importance.

You state that the three main sources of income for a park owner are:

1. The sale of new homes
2. Pitch Fees
3. Resale commission

With LPG gas prices unregulated the last park owner [REDACTED] (who never had a site license!) and the current owner [REDACTED] have been making [REDACTED] on the gas prices and also grossly overcharging for the water. [REDACTED] was using the retail price index when increasing his pitch fees and nobody ever checked on anything he did.

On the sale of new homes the park owners are making a profit of at least 35% and in the case of [REDACTED] is actively preventing the resale of properties by not telling prospective purchasers the utility prices on the park and [REDACTED] being so rude [REDACTED]

As residents wishing to resell their properties still need to use the services of an estate agent incurring the normal fees – I fail to see what the park owner actually does to warrant the receipt of any monies at all let alone 10%. I believe that it is essential for the amount to be abolished or at least standardised to 1% so that you prevent all the residents thinking they have negotiated differing amounts and new park owners refusing to recognise such and demanding 10% if they sell their homes.

The Mobile Homes Act Wales 2013 was supposed to address several problem areas – however it seems it has failed to do so.

Firstly there is the site license and a fit and proper person test for site owners. A site license is obviously a totally irrelevant document as [REDACTED] allowed to trade [REDACTED] without one! [REDACTED] deemed an unfit person and [REDACTED] would not have [REDACTED]

It also seems extremely vague as to what the site license actually covers as the stock council reply to any queries from residents is 'that is not covered by my/our remit'.

The enhanced enforcement powers for local authorities when inspecting sites is dubious also. People seem afraid to enter sites run by [REDACTED] and certainly do not inspect things thoroughly. For instance [REDACTED] has been requested by the council to [REDACTED]

[REDACTED]. None have been done properly and nobody has been to check.

[REDACTED] would not recognise the concerns if individuals so the residents took advice and formed a residents association and approached [REDACTED] with problems. [REDACTED] would not acknowledge the residents association and would only speak to individuals! [REDACTED] taken to a tribunal regarding [REDACTED]

Are these really 'fit and proper persons' to be running sites for retired people some of whom are vulnerable and infirm?

People should be allowed to retire and live in peace not constantly worry about what is going to happen next. There also needs to be consistency, not a different park owner every couple of years (as the [REDACTED] seem to do).

Park home laws need to be very, very specific and also enforceable. Departments need to take responsibility and act accordingly.

Yours sincerely,

Dear Sir/Madam,

We are writing in reply to the leaflet we received on Park Homes Commission Rate. We think it should be changed.

We moved into our home [REDACTED] years ago, during this time we have replaced [REDACTED], added [REDACTED], fitted a new [REDACTED] including a [REDACTED] and fitted [REDACTED], we have also [REDACTED] much of outside and [REDACTED] our shed.

We have paid ground rent monthly and although the road in front of our home was re-tarmacked, we had to pay for our drive to be done. We have also paid for the [REDACTED] to be replaced.

We don't see why the owner of the site should benefit from this, especially at 10% which is extortionate. 1 ½ - 2% would be more acceptable.

Yours sincerely

[REDACTED]

Consultation questions:

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1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C) A Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C) Be Abolished.

Park owner is doing nothing to justify any commission, They even capitalise on any improvement you make to your property. Therefore any improvement you make to increase the value of your park home they will take 10% on the improvement at sale.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

N/A

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

N/A

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

N/A

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

New occupier are not happy paying 10% to owner and are put off the purchase the seller also receives 10% less and can impact on available money for health care or any related health issues and once you down size to a park home the 10% commission aggravates any possibility of moving else where.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

No value added to park home as park home is supplied by park owner and in turn inflates the original cost of park home and with out exception as soon as you purchase a new home from park owner then devaluation accrues. These park homes do not increase in value as brick & mortar homes do.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

N/A

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

N/A.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N/A

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

To insist of a generic job description for site managers, to make the site manager more professional in the running of their parks.

Presently park owners are employing site managers who have no formal qualifications to manage or administrate park owners sites and as a direct result allow incumbent to run the park as they see fit, a detailed generic job description and job specification will standardise professional standard.

**Consultation
Response Form**

Your name: [REDACTED].

Organisation (if applicable): N/A

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

A) A Park Owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

A) Be retained at the current 10% level. Commission on re-sale is a vital income stream which is utilised to maintain and develop the park site. With out commission most park home sites would be financially unviable.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

20% of total income (on average).

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

2/3 Park home re sales per year.

Relied upon to assist with general maintenance and upkeep of the park.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

- **General Maintenance and upkeep.**
- **Employing grounds keeper.**

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Short term = less spent on upkeep/maintenance parks would deteriorate

Long term = Park home sites would close down.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

A substantial increase in ground rent charges to park home owners to cover lost commission.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

We are of the opinion that it is generally accepted by park home buyers & sellers.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

All depends on which park site the pitch is situated.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

It would be difficult to maintain standards of park sites.

Long term ground rents would increase significantly to cover lost income.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Yes

[REDACTED]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Extra legislation has increased costs.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

None.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

None

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C) A Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C) Be abolished.

Do you have to pay 10% before you can leave your home NO, why should struggling pensioners fund the luxury lifestyle of [REDACTED] who own our site.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

It just lines the pockets of these lying rogues.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Depends on hoe many old residents they can force to sell up, get rid of you for next to nothing, then re sell at massive profit, legal robbery.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

To fund a luxury a lifestyle. Check out the T.V programmes showing the obscene wealth these crooks have. Not spent on our park improvements.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

It would not our owner bought the park four years ago for £[REDACTED] has just sold for £[REDACTED] not bad for doing nothing but collect our money.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

By increasing every bill we pay. Force old people of site, resell to some other sucker, hope I can be rehomed by council.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many purchasers drop out, they have more sense than I had, solicitors advise their clients to reduce the asking price by 10% you are left with a pittance.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

It is obvious this form was written by idiots, many residents will not bother to reply, you do not have a clue on the workings of a mobile home park.

“A HOME OFF SITE IS WORTHLESS”

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

To site owners nothing, one less week in Barbados. To a resident everything we will invest more money in our homes and gardens in the knowledge that 10% will not be taken from us.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

From the Owner,

You must joking, we [REDACTED] have made our fortunes by ripping people off, cash in hand no accounts my Mercedes was given to me by my [REDACTED], the mansion form [REDACTED], contact ucontunt at [REDACTED].

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Great piece of work, if councils and site owners abide by the new legislation instead of ignoring them life would be rosy.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I am learning a lot of new Welsh swear words, when they read this useless document.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

This question highlights the pathetic nature of university idiots we have in the Welsh Assembly, god help us all.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

In conclusion, you are in the back pockets of site owners, another whitewash will be turned led out by the nodding dogs who are brain dead, nothing will change, you are spineless individuals who could not organise a free [REDACTED]

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number:

Your address: [REDACTED]
[REDACTED]

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Dear Sir,

In reply to your letter my view on commission being charged on park home is ridiculous because nothing warrants it. On this park I pay [REDACTED] a month ground rent that's [REDACTED] a year and have just paid [REDACTED] for [REDACTED] for side of road, also only 50year old or over can buy here, that means there has been 12 vans sold in last [REDACTED] years, there are about [REDACTED] vans on site selling for 60 to 90 thousand pounds average van 75 thousand pounds = £90,000 not small change £18,000 a year and I myself would like this charge abolished.

Thank you.

[REDACTED]

This charge serves no purpose, only to put money in owner's pocket.

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C plus D, refer to attached Letter

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

See attached letter.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Having lived on [REDACTED] for over 10 years we have seen 6 park homes resale with no obvious signs of improvement to the park with the 10% commission.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Unable to answer this question.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

See attached letter.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Welsh not used at this site.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

See attached letter.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): Home Owner

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

[REDACTED]

25 June 2017

[REDACTED]

Dear Sir or Madam,

Reference: Consultation on The Park Homes Commission Rates.

I believe that the maximum commission rate of 10% currently charged should be abolished at best or changed to 1%.

I believe that 1% is a justified amount; given that the current paid in each monthly ground rent by me is already £[REDACTED].

Consider that a 10% payment commission rate to be paid at a very stressful time, perhaps when a remaining partner decides that he or she cannot remain by themselves in the property or a family going through the process of grieving for their mother or father and at the same time having to sell the park home.

If you think of all these feelings at this time and then having to sell up the 10% can become a second loss and tragic big dip into your profit or your future working capital. i.e. having to pay about £10,000 set against the sale of your home. Say £50,000 instead of £60,000 all these monies have to pay for any funeral expenses etc.

As I have already pointed out in paragraph 2 there is already enough monies within the monthly ground rent to sustain payment to cover any expenses that occur when the sale of any park home is completed.

It would be good to know where and when the 10% commission was arrived at and who polices the commission scheme.

I have lived on the [REDACTED] for [REDACTED] years, to date there have been 6 park home re-sales with no obvious improvement from the commission.

I would be, along with my partner wish to contribute at any meetings.

Yours sincerely,
[REDACTED]

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

B Be reduced.

Give owners a fixed fee of £1,000 for every sale or they will make our lives hell.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Cannot be assessed some sales one year, none the next. Most of the site owners will always show a loss.

“creative accounting”

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Depends if by their unsavoury actions they can force people to leave the site, upset enough people make a lot of resale money.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Our owner [REDACTED] has just bought a brand new [REDACTED] together with [REDACTED] [REDACTED] cost £500,000.

Not a penny spent on our park.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

None. It's just an unearned bonus, pocket money for owners, who of course will all cry poverty.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

By ripping of residents even more than they do now, higher rent, double the price of L.P.G. threaten to close the park invent charges for maintenance work which should be paid put of pitch fee.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I have lost [REDACTED] sales, when people are made aware by their solicitor of the 10% sales tax walk away.

We pay £[REDACTED] per month in pitch fee, band [REDACTED] council tax then to be informed that a further 10% paid to the site owner at sale time, must be mad to live here.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The man who developed our park [REDACTED] [REDACTED] . £150,000 homes off site sold for £20,000 at auction so the answer to your question is WORTHLESS.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The owners response will be without the sales commission we will have to close the park and sell land for building houses, make residents homeless, serve them right for contesting the 10%.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Not on your life. [REDACTED] who own these sites work cash in hand any accounts will not show a true reflection on profit and loss. They can afford top accountants to fiddle the books their lifestyle will give the game away.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Brilliant, we lead the country on legislation, England trying to play catch up; in particular C.P.I instead of R.P.I is a great step forward. Congratulations to all Welsh Ministers involved.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Far more people who decide park home living is for them, will choose to live in Wales, our daughter now speaks Welsh after lesson from our next door neighbour.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Site owners will benefit from increased sales as purchasers especially on the Wales/England border are convinced that our mobile home act together with amended/abolished re-sale tax makes Wales for more attractive.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I apologise for my writing, onset of [REDACTED] I would love to live in sheltered accommodation, paying my own way not relaying on state hand out's but the 10% commission charge means I am stuck forever in what has become a prison.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number:

Your address: [REDACTED]
[REDACTED]

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- b. A representative body for park owners
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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C). I don't feel that much of any income received from the commission contributes to the overall income of a site up keep. We have crumbling concrete, and walls that have not been maintained. Also over grown hedges and the general look of the site is in decline and unkept. If I ever get lucky to sell my park home it won't be based on the up keep but despite above comments.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

The site has only approx. [REDACTED] homes on it, a larger area of static vans, caravans, & camping site would be the main source of income for the site owners. I'm not able to provide any evidence of this only an eyeball comment.

Unfortunately the residential side on this site is in decline and stagnant.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

I don't think the park homes are sold very often now, there are at least 3 [REDACTED] park homes now empty (have owners but no one lives in them I sad).

There is no evidence that when a park home is sold it is incorporated into any business plan for our site sadly.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I can't comment as I do not know. Sorry.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I don't have any documentation evidence to support my comments.

Only my own observations that this is a site in decline that will not exist in the future.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I think the payment of commission by a new occupier Owner or Selling occupier/owner, is made quite difficult when these hidden costs/loses of 'sale' entry to a new occupation is will make people think seriously about looking at this purchase as an investment when knowing a % is lost to commission etc.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

A well maintained expanding and a popular situated pitch adds greatly to the value and demand for buying and selling a park home or renting to a resident.

I can only refer you to the many catalogue park home sales where prices vary based on above.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The site owner makes profit on the sale of the original park homes & regular income for ground rent here is where maintenance cost could be added. However to continue to make pure profit every time a 'Park home is sold is some what frustrating and gets in the way of buy/selling your owned park home, knowing a set % is lost ground/maintenance costs to for many years while living/residing there.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

N/A

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated

or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N/A

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [redacted]

Organisation (if applicable) [redacted]

email / telephone number:
[redacted]

Your address: [redacted]

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If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

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- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C) A Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

B). Be Reduced.

The park owner provides no sales help or extra facilities.

Park homes lose their value year on year unlike bricks and mortar.

Commission on selling a house is around 2% for which professional help is given.

Nowadays new companies sell houses for under £1,000 commission.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Over the last █ years there have been approx. 8 re-sells on a site of █.

This provides around £80,000 from the same sales.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Approx. 8 re-sells over last █ years I have no evidence of what happens to the commission. We have no extra facilities over last 7 years.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

No evidence.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

None.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I have heard of a new buyer being unwilling to pay an extra 10% to the park owner and the current owner not wanting to drop the sale price.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

No value at all. Park homes lose value and rarely make any profit unless money has been spent on improvements.

It is an ongoing battle for the owner to re-paint and have surveys and work done so their home is kept up to standard.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

No evidence but it is reasonable to expect a company to cut back on expenses or try to increase pitch fees in some way.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

N/A

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N/A

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Because park homes are effectively lease hold as regards to the plot and values decrease I think the council tax band should be band A not C at present, this would compensate partly for having to pay commission.

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Response Form**

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Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C) A Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C). Be Abolished.

Ground rent & council rates are together expensive.

Sold houses do not pay this commission, why should park homes.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Do not know!

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

This varies year by year. At this moment 2 No of the ■ homes are up for sale.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

This is not spent on the site. Presumably goes into park owners bank account.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Only time will tell. I feel ground rent payments to be adequate return.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not Known.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Off putting, but one has to accept it, or not buy.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Unknown

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The seller will keep all sale money as with normal house sales.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

None.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Nobody speaks Welsh on this site.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

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Organisation (if applicable):

email / telephone number [REDACTED]
[REDACTED]

Your address: [REDACTED]
[REDACTED]

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C) A Park Home Resident

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Be Abolished.

My homes rent is being paid at the same rent as the previous owner. If I sell the new owner will set his own rent. So getting 10% of my sale plus more ground rent money without lifting a finger.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Depends on how many sites the park owner has. We rarely see ours, if lucky once a year. But am always able to contact him when needed, personally find him reasonable and easy to talk to.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

This depends on how happy the park residents are. Our park is made up of elderly residents, re. over 55's. Some have been here for 20-30 years. So as we die off homes are sold

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Have no knowledge as no improvements have been made.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Any new occupier takes into consideration the 10% when buying so looks for a lower price.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

This is affected by the park as some are very well maintained and some are not. Also by where does it have bus, shops, surgeries locally and views.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Not to sure as surely this depends on the site owner and how difficult he can make the residents feel.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated

or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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 - c. A park home resident (owner)
 - d. A park home resident (tenant)
 - e. A representative body for park home residents
 - f. Other, please state

Answer:

C) A Park Home Resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C) Be Abolished. The park owner has made initial profit and they are also in receipt of the monthly ground rent charge of [REDACTED] off every park home on site and they have spent nothing on the site in the [REDACTED] years I have been a resident.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Not known.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Not known.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not known.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Not known.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not known.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

No help what so ever. If the site owner has new units on site it is easier for him to do a deal with a new buyer even if the seller of an existing home is selling at a reduced price.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Not known.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Not known.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Not known.

We do not have any information on our Parks accounts. So we could not share any details with anyone.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Not known.

Again – it's not very helpful knowing that if we do sell our park home this 10% has to be paid to whoever. When no one offers any help to sell your park home.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Not known.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Not known.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Park home site owners help new owners to buy but not owners wishing to sell.

We cannot put a for sale board outside your park home – only a small notice in the window.

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We have our park home up for sale. We will have to reduce our price to sell it. We can't really afford to drop it any more. We have to buy somewhere else to live and we will struggle to get a property for what we sell our park home for. Then with this 10% to be taken from the sales makes it even more difficult. [REDACTED] – it's very worrying for us.

[REDACTED]

Consultation questions:

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1. Are you:

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer: Park Home Resident Owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Be abolished or certainly reduced to 5%

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

How is a resident supposed to know? What commission is involved?

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Again, how is a resident supposed to know what income is received by the park owner?
(Silly question)

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

How does a resident find out how the park owner uses that income. (One daren't ask).
(Another silly question)

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Again: how are residents expected to know? All I & others know is that the park owner does nothing to earn any commission on a sale.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

How the hell are we (residents) supposed to know!

10% commission on a sale for the pocket of a park owner is tantamount to “qualified robbery” as not a finger is lifted to earn it.

8. How does the payment of commission by a new occupier affect a resident’s ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

You should know. It can stop a sale because the purchaser refuses to pay what they regard as “blackmail”.

An “Estate Agents” fee is earned not so, commission for a park owner. Its Daylight Robbery

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

NONE

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Welsh Assembly – Cost is at Westminster.

At the moment, any commission on the sale of a resident’s ownership of a park home to the park owner is not short of Extortion.

11. If you are a park owner, would you be prepared to share detailed information on your park’s accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The Welsh language is a dead language. I was taught it at school but Britain is “English” not multi-cultural and that’s what I fought for 1939-1945.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N.B Is this supposed to be a question of language or a question of what is “right” or “wrong” with this 10% rip off of park home residents?

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

This whole questionnaire appears to be one sided and irrelevant to the idea of Right or Wrong. Let’s hope the “Welsh Assembly” can put an end to this “illegal” practise of 10% or any % commission for park owners on the sale of “homes”.

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

I am a Park Home resident who [REDACTED]
[REDACTED]. (Be Abolished).

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

The purchase of our home was 150,000 and we feel that the owners have already had sufficient profit on the property and also receive a ground rent which is a profit to them. Why does the site owner need to take a percentage when the house has to be sold, as he had already had his profit.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

From our experience how can we forecast how long we are going to live, therefore we cannot forecast how many homes will be sold over a period of time.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

It is impossible to forecast how often the owner will receive commission on the sale of a Park Home. We have only known 3 homes over the past █ years to be sold, due to major circumstances of the owners, i.e. death, going into care home.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I cannot honestly answer this question. Based on Personal observations, programmes on channel 4 & 5 and Park homes mag and articles in the National Newspapers.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

The Sale of New Park Homes, the income from pitch fees the (illegal) profits from the "Recharge of Utilities" and EXTRAORDINARY high income from 10% commission are cited as the major sources of a site owners income.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Making sure that people wish to purchase their new Park Home on a friendly, well maintained Park home site. Providing a Park Home site that existing residents are proud to call their home and to promote as a well worthwhile place to live out your retirement in a quiet enjoyment place.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The provision of an adequately sized property serviced and will maintained pitch on a fully licensed and well maintained Park Home site is probably worth 50% of that Park Homes value. This is always reflected in the price that a site owner charges. Manufacturers standard charge would be approx. £80 - £90K and a site owner would expect to receive a discount on that purchased price. It would cost the site owner around 8K to site that home on their park home site and depending on the location of the site, they will expect to receive between £185,000 and £250,000 for it when it is sold, so how can 10% of the home be justified.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition of the 10% commission in Wales, would attract more people to come and purchase Park Homes where by this will give the Site Owners more profit of Sales and will also encourage more money and boost council tax in the areas.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

In Wales we have the “fit and proper person” provision, our pitch fees can only be increased by CPI inflation index and the charge by a local authority for site’s license cannot be added to our pitch fees are some of these advantages.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I believe these changes will have no noticeable effects on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We moved here ■yrs ago and in that ■yrs we have had no problem with the Welsh speaking people most of them speak English as well and we see no problem with our ages of ■■■ we feel this will not cause any problems.

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[REDACTED]

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

<p>Answer: C</p>

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

<p>C. See note 15</p>

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

N/A

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

N/A

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

N/A

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

N/A

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

N/A

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Providing the abolition of the commission does not cause an increase to the pitch fee.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

N/A

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N/A

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

A Park Owner already makes a handsome profit on selling on a Park Home. I do not see why they should be able to profit twice from the same home, especially as these homes depreciate in value.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): [REDACTED]
[REDACTED]

email / telephone number: [REDACTED]

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer: C. A park home owner.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be abolished.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

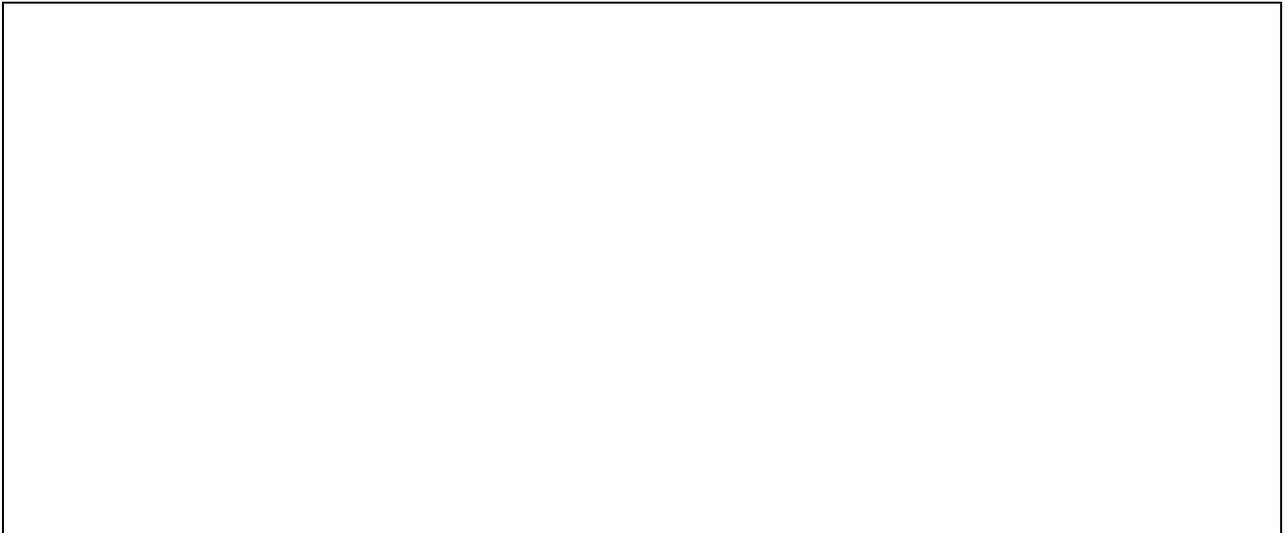
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5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

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12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Not Applicable

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Don't Know

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not Known

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Not Known

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not Known Only the park owner knows this information.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Did not pay commission when bought.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Not known

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The ten percent collected does not go to park maintenance on this park.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Not Applicable.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

?

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

?

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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

Park operator [REDACTED]

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Retained at current 10%. Our ground rent is very low [REDACTED] per pitch per week, loss of commission would put us out of business.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

In [REDACTED] £11,500 commission on a turnover of [REDACTED]. Taxable profit was £11, 746. In [REDACTED] £4100 commission on a turnover of £[REDACTED] taxable profit was £7469. [REDACTED] we were able to carry out some repairs.

[REDACTED] Caravans a year are sold at an average of [REDACTED] per van. This allows for repairs & renewals to take place. See accounts available.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

[REDACTED] caravans a year are sold at an average of [REDACTED] per van. This allows for repairs and renewals to take place. See account above.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

For repairs and renewals, cover bad debt and pay [REDACTED].

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Loss of commission would make park unviable and the company would cease trading. The land would [REDACTED] uses for housing if no licence. Only other alternative is it increase rent to a sensible level i.e. 50% increase.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Increase ground rent by 50% to cover loss of income.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Caravans sell very quickly at very high prices due to location and very low ground rent. All our tenants accept the 10%, there are no arguments about it.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

**Selling on site adds a minimum of 100% to value and in one case 1000%.
Recently we sold a caravan [REDACTED]**

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Our company would cease to trade unless the ground rent rose by at least 50%. We would not be able to make a profit if there was any bad debt or legal costs i.e. Eviction.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

You may see accounts, please call [REDACTED] to arrange.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We can no longer "vet" [REDACTED]

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

In our case none what so ever.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No effect here

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

You are welcome to call to discuss.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): [REDACTED]
[REDACTED]

email / telephone number: [REDACTED]
[REDACTED]

Your address: [REDACTED]
[REDACTED]

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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C - I am a park owner in residence.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. I do think this commission should be abolished completely – when we come to sell our Park Home we get no help from anyone. Why should we have to give 10% to whoever, when we also pay £[REDACTED] each month and nothing gets done on the park.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We don't know anything about income and the site business so we cannot answer this question.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

New homes are selling on the park, but pre-owned park homes not very often we are struggling to sell.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

We do not know.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

We have no evidence to this question.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

No evidence what so ever. We are not informed.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

People buying new park get a lot of help from site owners, but site owners do not help the people who live on park and want to sell their park home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

It's better being on a pitch but we have to pay £[REDACTED] ground rent every month, so really we should have well paid for our pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

I feel I have paid ground rent since [REDACTED] so this government tax on commission should be abolished completely. I was [REDACTED] and I had to pay for the [REDACTED] along with other resident who were also affected. Site owner not interested.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Yes I will give any information if I can be of any help as I feel strongly about this 10%, but I do not know much about the site owners [REDACTED].

Phone [REDACTED].

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Not known.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No idea what effect it would have.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Do not know any about Welsh Language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I have tried to answer questions the best I can, but the sooner the 10% is abolished it will be better for all park owners.

With thanks

██████████

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): N/A

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C: I own my own park home

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

B: This is a way for Park Owners to take more money from residents for doing nothing.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Park owner answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Park owner.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Park owner

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Park owner.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Park owner

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Commission paid by Vendor.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Stupid question!! Cannot be on site without renting a pitch!!

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition of this system would reduce the number of site millionaires!

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Would you???

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I do not own a sector!

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I see no reason for language to be a concern for these questions.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Dito!!

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

?

**Consultation
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email / telephone number [REDACTED]

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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C. Park Home Resident Owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Either abolished or greatly reduced.

That is the reason that I cannot sell up and move on. The park home owners do not deserve the money! We get no improvements and very little maintenance for the ground rent. If a building society sold a property they would get less percentage than 10%

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

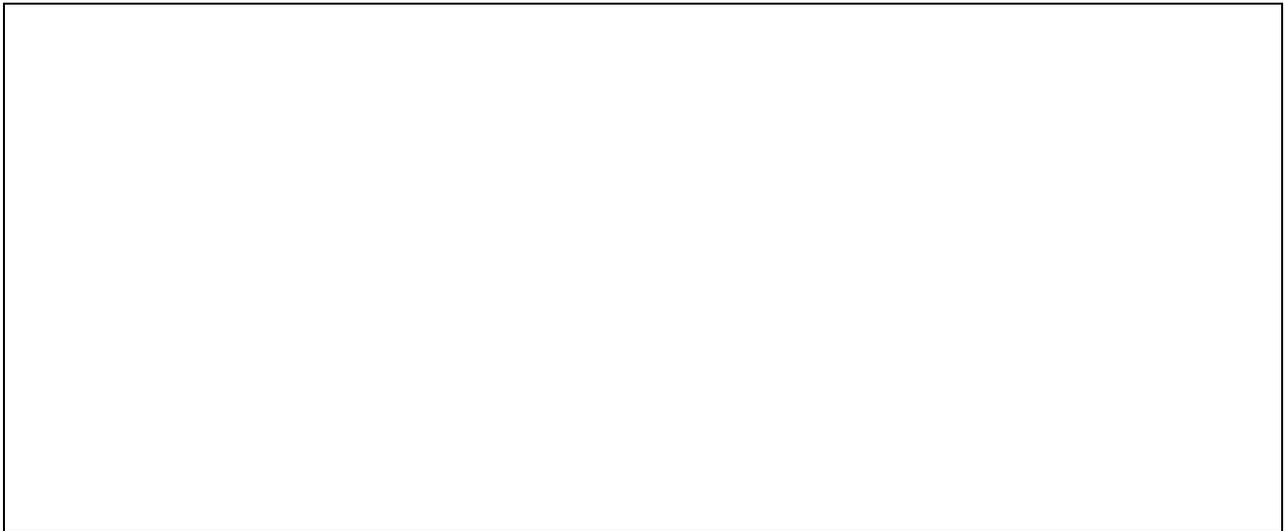
4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

They receive commission quite regularly, it does not reflect on the state of this park. I think that the owners accumulate the money to buy more parks therefore receive more ground rent.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Certainly not used for improvements.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

A lot of new residents are not told about the 10% until they receive the contract and that can be along time after purchase. Although now we can sell our homes and I would be honest and tell them. That might make me loose a sale.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

None

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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 - f. Other, please state

Answer:

C. Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Be abolished

The site owner has no involvement in the sale of the park home.

No involvement in

- (A) Advertising for sale of the home**
- (B) Conduct viewing of home to prospective buyers**
- (C)**

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Not Known

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Three park homes have been sold on our site in the last [REDACTED].

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not known.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

No viability at all.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not known

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Not known

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Minimal value

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Cannot envisage any consequences of the abolition of the commission

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

I am not a park owner.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Not known.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Not known

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Not known

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

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Organisation (if applicable):

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[REDACTED]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

A Park Home Owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Be Abolished.

My reasons are.

The park owner does nothing to earn this commission

They do not advertise for us or do any paper work towards the sale. We still have to pay estate agents & Solicitors fees.

This of course in most cases falls to inheritors on our demise. 10% is for too much.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

N/A

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

?

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

?

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Commission is paid by the vendor not the new occupier.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

We have assumed all park homes are situated on a pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

?

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

?

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

?

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

See question 14

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no understanding of questions 13 & 14 and fail to see what relevance the Welsh language has to do with this questionnaire.

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Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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 - c. A park home resident (owner)**
 - d. A park home resident (tenant)**
 - e. A representative body for park home residents**
 - f. Other, please state**

Answer:

A Park Home Resident (Owner)

- 2. Should commission on the re-sale of park homes in Wales:**

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Abolished.

The Park owner does nothing to improve the site with the money received. Our monthly rent more than covers any jobs he does. None of the 10% goes on the park.

- 3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.**

We have no park manager. The previous manager left [REDACTED] [REDACTED] He used to keep the grounds tidy of park homes for sale. Now the grass & weeds are 2ft high [REDACTED]. They are a disgrace. [REDACTED] [REDACTED]

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

The park owner sells on average [REDACTED] homes a year & none of the money is ploughed back into the park. I am [REDACTED] & I can't afford to move when I moved in the park was kept perfect. If I was younger I would clean the park myself, it is so depressing.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

None of this income goes back into the park. The owner keeps on promising to do jobs but never does. Most if the owners work hard to keep their homes neat & tidy but the entrance is a mass of weeds. We really should have a Park Manager.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

[Redacted]

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I cannot send you any photos [Redacted]. I wish someone could come & see the mess. They would see the state of it. [Redacted]

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

You say commission by a new occupier. On our site the seller has to pay 10% to [REDACTED], this reduces the money we have left to buy a new home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

When our site had a manager it was a picture, but now it is neglected it puts people off from buying. When [REDACTED] was selling the new buyers withdrew 3 times because of the terrible state of the [REDACTED] this shouldn't happen.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

If the seller has to pay 10% commission they can't buy a new home. If the buyer has to pay 10% on top of the house price it puts them off buying.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No one speaks Welsh on the park as there are very few residents that speak Welsh. Most residents are people from England moving to Wales because homes are cheaper.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I am ■ & when my family visit I am ashamed of the mess around me. It is very depressing. There should be a site manager to keep the park tidy.

10% commission for what?

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

I am a Park Home Resident Owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Be abolished as the owners already get our monthly ground rent for ■ of our homes that amounts to quite a good income. This commission on the re-sales is nothing but GREED. Rate on this park is from ■.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I cannot answer this question because I am not privy to my site owners business dealings. As far as I can ascertain no money from 10% commission is spent of repairs or improvements.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

These homes are difficult to sell because of monthly ground rent plus 10% commission.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

As far as I can tell the money goes into the owners pocket.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

As a resident of a Park Home site the abolition of the 10% will make it easier to sell my house.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I cannot answer this question.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The homes on our site have been sold for much less than what we purchased.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

As my pitch has to be maintained by me it has already cost me quite a sum of money. Site owner has no part in keeping the upkeep of my garden etc. The value of my pitch on which my home stands comes from my own pocket ONLY.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition of the 10% will make it easier to sell my home.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

I am not a Park Owner

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Don't know

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I have no beliefs

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I fully support the abolition of the 10% & people working to abolish it & I would like to thank them for their hard work.

(I am a Welsh National)

Diolch yn fawr.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): [REDACTED].

email / telephone number [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

A.

C.

Home Purchased for cash

Rent for Land paid monthly

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Answer B. Ground rent paid monthly

Other questions not relevant.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. A park home resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B. Be reduced.

Caravans are a lot more expensive than when I first came here in [REDACTED].

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

No idea, not a great deal from the appearance of the site.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Not very often, although unusually there are now a quite a few places up for sale. I know nothing about the business plan.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I do not know.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The landlord might decide to improve the appearance of the site.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I do not know.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

If it is too expensive it might not get sold.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

I do not know.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The 10% commission has always been required since I came here. I really do not know anything at all about the landlords business.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I cannot see how in this area () how coming to live in a caravan site would improve any chances to speak Welsh – unless of course you may be lucky.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I have no idea.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

My caravan is old. It was not new when I bought it () I do not expect to sell it. If and when I leave the caravan will have to be taken off the site.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer: C. A park home resident (Owner)
--

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B. Be reduced.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number:

Your address:

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Consultation questions:

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. A park home resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

- A. No current 10% level too much
- B. Be reduced – suggest to 1% - More than adequate.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Income (ie. Commission onsale) is paid by park home owner when they sell their home at the present time 10% of sale price goes to park site owner.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On this site each home is considered as leasehold and ground rent of £[REDACTED] per month is levied by the site owner.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

[REDACTED] employed to look after the general appearance of this site other than the area covered by each home owners responsibility.

The owner has office accommodation on site to run his business.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The new owner (purchaser) does not pay commission when buying. The seller has to pay the 10% commission on the same price to the park site owner. The last [REDACTED] three homes have been sold (secondhand) for approx. £270,000 total.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. A park home resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Commission on the re-sale of park homes in Wales.

C. Should be abolished. My reason being the park owner does nothing for the 10% he is claiming.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Residents don't know much about the commission which is a bonus for them, and a great loss to anyone selling their mobile home. After putting all of their hard work and money into a home and reduced by 10% to give to someone else.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Mobile home owners are given the deeds to sign, so with every new owner the same will apply, to leave 10% of value of the mobile home in commission for the owner. Who does nothing toward any sale. We don't know how the money is used. Business or otherwise. They drive expensive cars (we do know that).

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Same as above.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

To change the way of commission payments short and long term is to stop charging money for something you don't work for.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

The park owner will make some crime easier to understand if he's getting something for nothing and that's what this is a crime.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Not everyone has the reason for selling property in the same circumstances when I sold my bungalow I paid the estate agent a small rate of 1 ½% but he sold my bungalow and did all the work. Not someone who sits back for the money to roll in.

I could phone him and I would look at all different details which would make the selling faster. He would take photos of all the rooms in colour and help with everything possible. The circumstances at the time I moved to [REDACTED] was something I found myself in. Couldn't avoid signing the deeds.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The park mobile home situated on a pitch wouldn't had value. Its not freehold. The land belongs to the park owner so you are limited to what you value and its just the home. You can't do what you like, he the park owner makes all the rules. We pay all the money.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Because I don't own anything but the mobile home everything we do we are scrutinized. [REDACTED]
[REDACTED]. If they see you doing the wrong kind of work they don't allow they make certain you are told.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

N/A

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

You can only speak the language you know understand, spoken or written with ease.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Not known

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I have something that could create an issue. [REDACTED]
[REDACTED]. I would like to move closer to an hospital that would treat me. Would I still have to save 10% for commission or medical ground be different wanting to move.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:
C. My husband and I have lived on [REDACTED] for [REDACTED] years

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

The 10% commission should be abolished as Park Homes are more desirable now and years ago where very cheaply available and ground rent costs to. As both homes and ground rent have increased and more people wanting to live in them the owners of the parks ar getting u to and over 20,000 pounds commission as well as ground rent and not only get it once it's every time a home gets sold on. It is totally not fair

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We can't be sure about, only the site owners know the answer to this, but I think the amount of ground rent should go along way to cover any improvements made, as the improvements made are to the park owner's advantage to get more people to buy.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

The park owner's gets commission every time a home is sold by home owner or through death or just a decision of home owner to move. This is outrageous and greed by park owners. How it's incorporated into business plan is any ones guess.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I cannot answer honestly this question, but seeing the cars that owners [REDACTED] all drive and T.V. programmes CH4's TV How do you get rich and C5's channel Million pound motors, site owners live very extravagant lifestyles.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

A lot of sales are affected by the 10% commission costs and the site ground rent so it would be easy to sell homes at reasonable costs.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

By providing a park home site that is friendly and well maintained for future park home residents and a park existing home owners will promote a nice place to live and enjoy. As they all don't live up to the big promotion park owners promote in the magazines they hand out.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Owning a home on another persons land is very different from bricks and mortar homes, some people are made more nervous by finding out about rules park homes have they previously knew nothing about and would have difficulty selling them your home more so if you are of a nervous disposition.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

I would estimate 50% of that park homes value. The manufacturers standard charge for a modern double park home is approximately £80- £90K. cost to site home estimated guess 7K and they go on to sell between £85,000 to £250,000. The new owner has an agreement for paying a monthly pitch fee to site owner.

Then if they decide to sell privately the agreement is transferred to new owners on completion of sale, new owners pay pitch fee nothing as changed, how can 10% commission of £18,000 to £20,000 be justified.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

To abolish 10% commission should attract more people to buy park homes across Wales. Making them more desirable and park sites more valuable resulting in direct monetary benefits to site owners, The local economy, local authority by receiving a boost to council tax from less populated area of the nation.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

It has had a better effect as to make it more fair to owners of park homes and site owners.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I don't think this will have a noticeable effect on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Should English people buy a park home in Wales they may like to learn something new and wish to learn the Welsh language this would be up to the new owners.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

N/A

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number:

Your address: [REDACTED]
[REDACTED]

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C. My wife and I have lived on [REDACTED] for the past [REDACTED] years.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

I think the commission on the re-sale of park homes should be abolished. The reason being is years ago the park homes could be bought fairly cheap and ground rent was also cheap, but over the years the cost of both has increased the cost of mobile home are now more expensive than a lot of brick built houses and it is unfair to charge up to £20,000 commission to the park owner as well as ground rent.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

This is something we can not say for sure but surely the amount the park owner receives from ground rent should cover the cost of any improvements made on park.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Every time a park home is sold whenever a home owner dies or wants to move.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Unable to comment on this question. We are never told by park owner.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

More park residents may be able to sell their homes for a reasonable price. Between the cost of commission and ground rent put a lot off possible sales going through.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

This must be answered by park owner.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

See answer of question No. 6.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

You can buy a park from between £30,000 to £80,000 but sited on pitch could be sold for £80,000 to £200,000.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

All relevant answers have been said in my answers to all questions.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The above act has made owning and living on mobile sites more fair for both site and home owners.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

This would be up to every individual living on sites.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

It would be very useful for non welsh speakers to learn the language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]
[REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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Dear Sir,

In reply to the leaflet concerning the 10% on the sale of our homes, it should be abolished as soon as possible, it is neither earned or deserved. It also goes to putting people off buying, if we decide to sell.

Yours



Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer: A park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

c. Be abolished

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Substantial I would think.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Some years no commission as none are sold.

This [REDACTED], 5 have been sold resulting in 50% of the total value of those going to the park site owner.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

We do not know.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

No comment other than it would make it easier to sell your home.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Don't know.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

At present it means harder to sell as the new owner would have to pay the 10 per cent with out the commission – it would mean an owner would be able to sell their home for a little less making it easier to sell without any commission to the site owner.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Depends on where it's pitched. In our case we are in a prime position having a lovely view and high up making it one of the easiest to sell.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Consequences are good for the seller & buyer as no one would have to worry about to pay the 10 per cent.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Don't know.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comment

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Don't know.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

A park home resident.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Be abolished.

This is an age old idea set up by site owners as away of making a profit with having to earn it. It is now 2017 and it should be abolished completely.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Site owner.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Site Owner.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Site Owner.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Site Owner.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Site Owner.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It could make a home more difficult to sell when the buyers realise they have to pay the owner 10% commission.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Do not know.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

See question 8.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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Organisation (if applicable):

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Your address: [REDACTED]
[REDACTED]

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

A). A park owner with my husband in [REDACTED]. We have owned our home for [REDACTED] years.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C) Be abolished.

The charge goes back to the 1960's but over the years has been changed until 1983 10% rate was introduced. The "Mobile Homes (Wales) act" was brought in, in 2013 removing site owners from the private sales of the park homes. They can no longer claim the 10% commission for helping to sell a private sale so it has now become obsolete.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

It's impossible to say how many park homes in our site will be sold privately, in any particular year.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

It's impossible to say how often commission income is received as there has been only 1 private sale in the last █ years as far as I know.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I couldn't say how the commission income is used by the park owner.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I cannot say how changes would impact on park home sites, except it is in addition to the sale price. Not many buyers would want extra costs.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Now owners would be assured of a well maintained site and get feedback from existing residents to promote the site as a good place to spend in their retirement.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

In buying a park home some purchasers are nervous about not owning the land and of the house being made of wood. If they are still interested then you mention about the 10% commission on top, that would then put a lot of purchasers off.

Abolishing the 10% could help sellers and purchasers alike.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

As far as I know, as long as the pitch is of a decent size and properly serviced it is probably 50% of the park home's value. As long as the pitch fee is paid regularly then the pitch is yours indefinitely and this would be passed on to new owners signing the contract.

Effectively nothing has changed, so how can 10% commission be justified.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

With the abolition of the 10% commission in Wales along with the Mobile Homes (Wales) Act 2013 makes living in Wales a better prospect than sites in England. If homes are sold quicker then everyone benefits, the local economy and local authorities with council tax. Park homes would hopefully be more desirable without the 10% commission and become more valuable.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The Mobile Homes (Wales) Act 2013 gives park home owners a safeguard for pitch fee increases. They can only be increased by the CPI inflation index. Also local authorities don't charge for the site's license on the home owners pitch fee. The English do not get these benefits at the moment.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I can't see it making any difference to the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I cannot see it making any difference to where I currently live although I suppose it could do more English moving to West or North Wales.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I just hope that if park home owners all challenge the 10% commission charges then it will influence the outcome!

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

- 1. Are you:**
 - a. A park owner**
 - b. A representative body for park owners**
 - c. A park home resident (owner)**
 - d. A park home resident (tenant)**
 - e. A representative body for park home residents**
 - f. Other, please state**

Answer:

C. A Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Be abolished.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I would think very substantial.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

This year on our site ■ were sold at 10% of selling price of each home other times none are sold, sometimes the same home could be sold more than once.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

We do not know.
We have no ■, no ■, not facilities so looks like no outgoings.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

It would make it a lot easier to sell your home. People do not like the 10% commission.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Sorry don't know.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It is more difficult to sell as the 10% comes into effect it would mean more sellers could sell their property for less as the site owner wouldn't have their commission.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Depends where the park home is sited some homes are sited where there are no views, others are sited in a better position not being overlooked.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

It would be much easier if you did not have to worry about the 10%. Buyers & sellers.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Don't know.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Comment.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Don't know.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

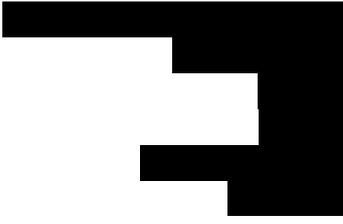
Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:



Dear Sir,

We enclose the questionnaire regarding the forthcoming consultation and would further like to express our views regarding this important matter.

Firstly, we would like to bring to your attention that we sign an Agreement with the Park Owner and in this Agreement it is laid out in plain language that we are liable to pay the Park Owner a 10% commission in the event of selling your Park Home to a third party. Most owners come onto a park home to retire and live out their lives in peace and tranquillity, it is desirable and above all affordable, this is the scenario we envisaged when we decided to buy our Park Home.

It is our understanding that the 10% commission that the Park Owner receives on sales is taxable, are you not shooting yourselves in the foot? Who is going to be held accountable in the future when the Government realises it is running out of money which it already is. Furthermore the ramifications if you remove this commission will be untold; we will lay out some home truths;

1. Where will the Park Owner get his money from to invest in park improvements and general upkeep, maintenance, legislation regarding electrical modifications forced on him to keep us safe? The list is endless, fire regs, water, sewerage and licences, all paid for out of rents, **Don't Make Me Laugh!** I had no idea that Park Homes have magic money tree.
2. We recently had the [REDACTED], oh you think for two and six. The [REDACTED] costing thousands.
This has all been paid for by a couple of sales where residents have suddenly passed away. These sales only happen now and again they are not regular.
3. The words fail us that it has come to a consultation process to remove or reduce the 10% commission. On this Park we pay [REDACTED] every 4 weeks this includes water and sewerage, there are [REDACTED] homes on our park, the owner comes [REDACTED] usually to visit and [REDACTED] [REDACTED] we might add not in a Rolls Royce but in a leased vehicle. This rent is controlled by the CPI and this year at 1% very difficult to pay all these bills, you do maths. This is the Park Owners Business; he also has to pay himself a salary out of this.
4. By removing the commission you will jeopardise the small park owner and could force him to look elsewhere to try and make a living. Then what? Install a local authority manager with a salary 3 times more than the Prime Minister, no wonder we are in a mess. Where does it all end? We hope that if this goes through the vote is recorded and in the future the appropriate officers and Assembly members can be held accountable.

Finally please, please make our responses public or invite us to your consultation, we have lots more that we can help you with a final judgment on this important matter. Make sure you get the decision right, the ramifications we have brought to your attention could be horrendous, or you will put the small Park Owners out of business. Then what?

Yours sincerely

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. A Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

A), Be retained at current 10% level.

The park owner will not be able to invest, upgrade or sustain levels of maintenance required to keep the park in a fit and proper manner, i.e. Hedges, fencing, roads, street lights, safety equipment – most of this is not sustainable from pitch fees alone.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We had the [REDACTED] refurbished the cost alone was some £6K – this was achieved by a park home sale.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

I have lived on [REDACTED] years – To my knowledge we have had [REDACTED] sales in this time – [REDACTED] every 2 years.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Road refurbishment – Fencing – New Walls and general grounds maintenance.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

This lovely park will go to rack & ruin in a short space of time. The rents would not cover general maintenance and upkeep. It would be madness to remove the 10% level – this proposal is ill conceived and no thought for the consequences.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

How can he? The park owner is controlled by the CPI on rents 1% at the moment not exactly a fortune is it.

You do the maths – Especially small parks.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Nothing what so ever? You sign an agreement with the park owner – it is clearly pointed out to you what you are letting yourself into. If you engage a solicitor he would point all this out.

You have to understand that small park owners owning only one or two parks with say ■ units on are not having that many sales.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Depends on where you are sited on the park and the site of the pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Please see my attached letter. I have made a strong case to retain the 10%.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

By not allowing the park owner to vet incoming residents. We could end up with the wrong or undesirable coming on-board.

You draw your own conclusion

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Dim Problem.

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Organisation (if applicable):

email / telephone number: [REDACTED]
[REDACTED]

Your address: [REDACTED]
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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

A Park Home Resident for [REDACTED] years.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

BE ABOLISHED.

This outdated charge effectively traps a Park Home Owner, because unlike a traditional bungalow which appreciates in value, unfortunately a Park Home depreciates, therefore, if for whatever reason a Park Home owner wishes to move they would have far less equity in their property to be able to buy something of similar quality or standard.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I worked out some figures which I obviously cannot support but based on common sense and a lifetime of experience which I believe shows that a site owner can expect to make in excess of £500,00 per year per Park Home clear profit, which would mean on our site of £50,000.00.

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5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

It is impossible to forecast how often commission would be received therefore I repeat my comment for Question 3 – no business man would rely on this income to main the viability of their enterprise.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I can only assume to pay for the little extras in life such as owning their own helicopter.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

If we believe that Park Home sites will remain viable without the 10% commission charge, then there would be no impact.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

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Judging by what site owners add onto an obviously discounted price they pay for a new Park Home from the manufacturer and allowing for preparing a base, brickwork, drainage, services, drives and paths, I would suggest it is probably in i.e. £30,000.00 and upwards.

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Owner to reply

12.

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None.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

None in [REDACTED].

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Answer:

C

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6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

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Answer:

C A Park Home Resident (Owner)

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Answer:

Park Home Resident (Owner)

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None in [REDACTED].

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Answer:

D.

2. Should commission on the re-sale of park homes in Wales:

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- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B.

If the commission is abolished the park owners will increase the monthly rent.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

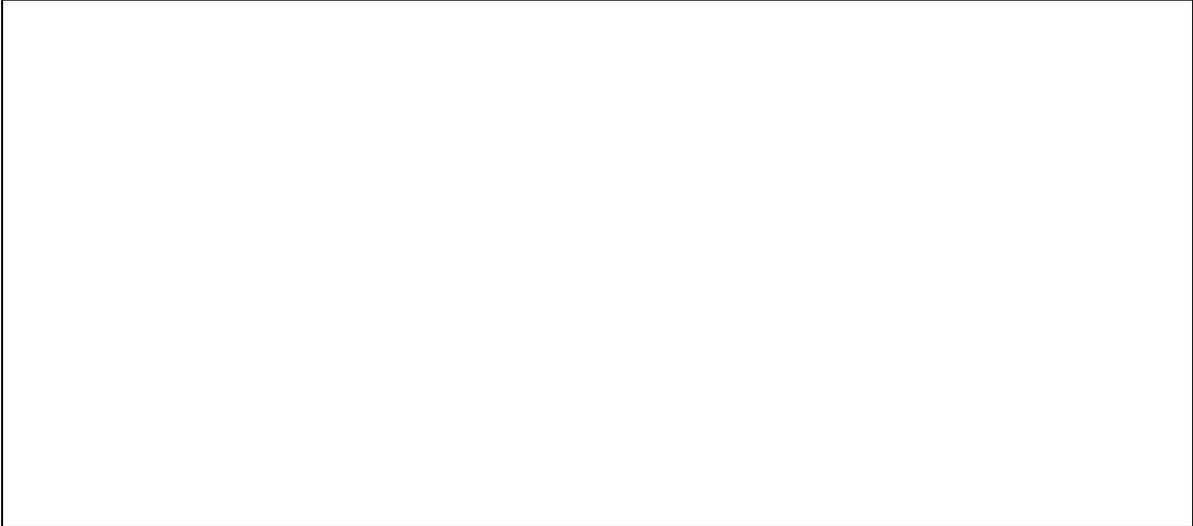
4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Random sales are not guaranteed annually.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

10% of sales on homes

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



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At the moment the park owner has not invested for several years to improve the appearance and safety for the residence. So sales here have not preceded as the feed back to the relevant estate agents is the park is very shabby.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

When the overall appearance of the park has down graded this devalues the whole park. This should be part of the park owners license agreement that maintenance must be provided to be done, this then improves the chance of a sale and add value to the park and properties.

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We put more than 10% into our properties. We as residents modernize and repair & paint to keep the inward and exterior appearance good to very good but when the park owner does nothing then there should be a reduction.

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2% to 5% is a more reasonable commission rate.

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- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished because the park owner does nothing to earn the 10% currently being paid.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

It is impossible to forecast how many homes would be sold in any one year so impossible to tell how much the income received would contribute to the overall income of the site.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

It is impossible to forecast how often commission will be received.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I cannot answer this question.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I do not think the change to the payment of commission would have a major impact. The majority of the park home sites income must come from the regular pitch fees paid each month.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

The impact would be mitigated by having more homes on vacant pitches. This would be helped by having a happy set of residents who promoted the benefits and joy of living on a good well run park.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

On this park the 10% is paid by the vendor so the question does not arise.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The provision of a good sized properly serviced and well maintained pitch on a good park home site is probably worth half of that park home's value. When the home is subsequently sold the site owner would expect to receive anything to £20,000 (sale price £200,000). It is very hard to understand how that can be justified.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Having to pay a 10% fee on the sale of your home will be a great deterrent to potential new purchasers. Park home living is becoming more popular but this could increasingly be helped by the abolition of the 10% charge with the immediate effect of making park home sites more valuable and also benefiting local authorities through more council tax.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I think in Wales there are benefits of

1. The fit and proper person provision
2. Pitch fees can only be increased by the CPI index.
3. The charge by a local authority for a sites license cannot be added to our pitch fees.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I believe these changes will have no effect on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

These may be some positive effects where people from outside Wales come to live in Welsh Park Homes and get involved in Welsh speaking events near their parks e.g. Welsh choirs and other cultural events.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. Lived here ■ years

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

BE ABOLISHED.

This outdated charge effectively traps a Park Home Owner, because unlike a traditional bungalow which appreciates in value, unfortunately a Park Home depreciates, therefore, if for whatever reason a Park Home owner wishes to move they would have far less equity in their property to be able to buy something of similar quality or standard.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I worked out some figures which I obviously cannot support but based on common sense and a lifetime of experience which I believe shows that a site owner can expect to make in excess of £500,00 per year per Park Home clear profit, which would mean on our site of £50,000.00.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

The 10% commission does not give guarantee of income. No business man would rely on this to maintain the viability of his enterprise.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

It is impossible to forecast how often commission would be received therefore I repeat my comment for Question 3 – no business man would rely on this income to main the viability of their enterprise.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I can only assume to pay for the little extras in life such as owning their own helicopter.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

If we believe that Park Home sites will remain viable without the 10% commission charge, then there would be no impact.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

By maintaining their sites to a high standard which in turn will ensure that individual Park Home owners will be proud of their park and encourage people looking for a new home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

First you must consider the individual purchasers situation, most buyers are elderly people who wish to downsize due to either not requiring so much space or need a level floor, bungalows are hard to find, therefore most would view their move into a Park Home as their last move. The 10% commission charge does put a lot of people off buying Park Homes, but due to a lack of reluctantly accept it.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Judging by what site owners add onto an obviously discounted price they pay for a new Park Home from the manufacturer and allowing for preparing a base, brickwork, drainage, services, drives and paths, I would suggest it is probably in i.e. £30,000.00 and upwards.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

The abolition of the 10% commission would make the purchase of a Park Home far more attractive and would encourage new Park sites to be created and existing ones extended where possible.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Owner to reply

12.

The only obvious benefit is that the increase/decrease in ground rent is controlled by the CPI and the RPI.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

None in [REDACTED].

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. A Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

BE ABOLISHED.

This outdated charge effectively traps a Park Home Owner, because unlike a traditional bungalow which appreciates in value, unfortunately a Park Home depreciates, therefore, if for whatever reason a Park Home owner wishes to move they would have far less equity in their property to be able to buy something of similar quality or standard.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I worked out some figures which I obviously cannot support but based on common sense and a lifetime of experience which I believe shows that a site owner can expect to make in excess of £500,00 per year per Park Home clear profit, which would mean on our site of £50,000.00.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

The 10% commission does not give guarantee of income. No business man would rely on this to maintain the viability of his enterprise.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

It is impossible to forecast how often commission would be received therefore I repeat my comment for Question 3 – no business man would rely on this income to main the viability of their enterprise.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I can only assume to pay for the little extras in life such as owning their own helicopter.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

If we believe that Park Home sites will remain viable without the 10% commission charge, then there would be no impact.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

By maintaining their sites to a high standard which in turn will ensure that individual Park Home owners will be proud of their park and encourage people looking for a new home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

First you must consider the individual purchasers situation, most buyers are elderly people who wish to downsize due to either not requiring so much space or need a level floor, bungalows are hard to find, therefore most would view their move into a Park Home as their last move. The 10% commission charge does put a lot of people off buying Park Homes, but due to a lack of reluctantly accept it.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Judging by what site owners add onto an obviously discounted price they pay for a new Park Home from the manufacturer and allowing for preparing a base, brickwork, drainage, services, drives and paths, I would suggest it is probably in i.e. £30,000.00 and upwards.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

The abolition of the 10% commission would make the purchase of a Park Home far more attractive and would encourage new Park sites to be created and existing ones extended where possible.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Owner to reply

12.

The only obvious benefit is that the increase/decrease in ground rent is controlled by the CPI and the RPI.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

None in [REDACTED].

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 - e. A representative body for park home residents**
 - f. Other, please state**

Answer:

We are a Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished

We think it is an unfair tax on our ability to move on due to our increasing age and our ability to maintain the property. This after maintaining and improving the property for a good number of years. We lose 10% on the sale price.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We have no information as to how much the owner puts into the business but there is no evidence of much going in to our park as over the years the overall state of the park has deteriorated. Despite the sale of several homes.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

In our experience over [REDACTED] years four homes have been sold, but we have no evidence of anything going into the park or business. Question for the owner.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

We have no evidence as to what the owner does with the commission received from the sale of the homes.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

As far as we are aware the only answer we can give is to abolish the commission. In our opinion and our experience of living here we have seen no benefits on our park. We have no evidence written or otherwise as to what the impact might be.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We have no evidence.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The loss of 10% on the sale of our home would seriously effect our ability to purchase or rent a new home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Apart from the fact we are already paying pitch rent of [REDACTED] per month which gives us security of tenancy, as per park rules. We cannot see how it can add value to the home.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition of commission would greatly improve the likely hood of a sale. As many prospective buyers are put off by this as we have experienced first hand.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

None

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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- d. A park home resident (tenant)**
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- f. Other, please state**

Answer:

Park Home Resident (Owner)

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- a. Be retained at the current 10% level**
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Please provide your answer choice and explain the reason for your answer

BE ABOLISHED.

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It is impossible to forecast how often commission would be received therefore I repeat my comment for Question 3 – no business man would rely on this income to main the viability of their enterprise.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I can only assume to pay for the little extras in life such as owning their own helicopter.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

If we believe that Park Home sites will remain viable without the 10% commission charge, then there would be no impact.

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By maintaining their sites to a high standard which in turn will ensure that individual Park Home owners will be proud of their park and encourage people looking for a new home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

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10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Judging by what site owners add onto an obviously discounted price they pay for a new Park Home from the manufacturer and allowing for preparing a base, brickwork, drainage, services, drives and paths, I would suggest it is probably in i.e. £30,000.00 and upwards.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

The abolition of the 10% commission would make the purchase of a Park Home far more attractive and would encourage new Park sites to be created and existing ones extended where possible.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Owner to reply

12.

The only obvious benefit is that the increase/decrease in ground rent is controlled by the CPI and the RPI.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

None in [REDACTED]

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. We are all park home owners but as our views are identical we are responding collectively i.e. as a voluntary participating group.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. the residents feel that the commission rate should be abolished for the following reasons:

The park owners do not contribute to any increasing value of individual homes. Home owners are fully responsible for improvements and maintenance of their own properties and it is wholly unfair for park owners to benefit from any increase in value resulting from any work completed by individual home owners.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We have no information on this aspect. We would point out that the monthly pitch fees paid by home owners are substantial and constitute a very significant contribution to the overall income of the site business.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

We have no specific evidence to offer on this point but would observe that, on average , we would think around 2 or 3 homes are under transaction most of the time.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

As far as we are aware there is no direct relationship at all between commission received by the park owner and tangible outcomes of use of that commission for the benefit of home owners.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

As indicated in the previous answer, we would not anticipate any particular impact on the park home site, either short term or long term, since we are unaware of how the commission is used by the park owner.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We are unable to comment on this point.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

A resident seeking to sell a home has to consider how the potential 10% commission to be taken by the park owner will affect the asking price. A new occupier has to evaluate the value of the property both in terms of the money paid to the vendor and of the extra 10% collected by the park owner – a significant figure in today's average cost of a home. The psychological impact of paying 10% to a park owner who does nothing to merit such a payment, can effect adversely the position of the seller in fixing the asking price.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Being located on a fixed pitch adds a significant degree of a feeling of permanence and 'stability' both to the home owner – who is motivated to improve the quality and character of the immediate surroundings- and to any potential new occupier who is likely to be similarly motivated.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The major consequence of the abolition of the commission would be that occupiers will feel that 'fair play' has been established between themselves and the park owner. Any feelings of being 'exploited' by park owners, who in effect benefit from the efforts of occupiers to maintain and improve their own properties, would cease. The natural process of selling one's property to a potential new occupier would prevail without any of the complications of the present 10% 'rake-off' system being endured.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Not applicable.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The Act sets out clearly the rights and responsibilities of both the occupier and the site owner and is a valuable resource of information for both parties. Specifically, [REDACTED], the site owner has confirmed in writing our pitch fee situation and that it will be reviewed in future on the basis of the CPI percentage. This position is welcomed.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We feel that any effect that the proposed changes to the commission rate would have on the Welsh language would be insignificant.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on

treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Our current population consists of people aged 50 years and over and, as it happens, English is the language used. No limitations exist on opportunities to use the Welsh language if desired and our linguistic ethos is genuinely an open one.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

There are no further issues relating to the abolition of the 10% commission that we wish to raise at this time.

**Consultation
Response Form**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.

The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, [REDACTED].

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

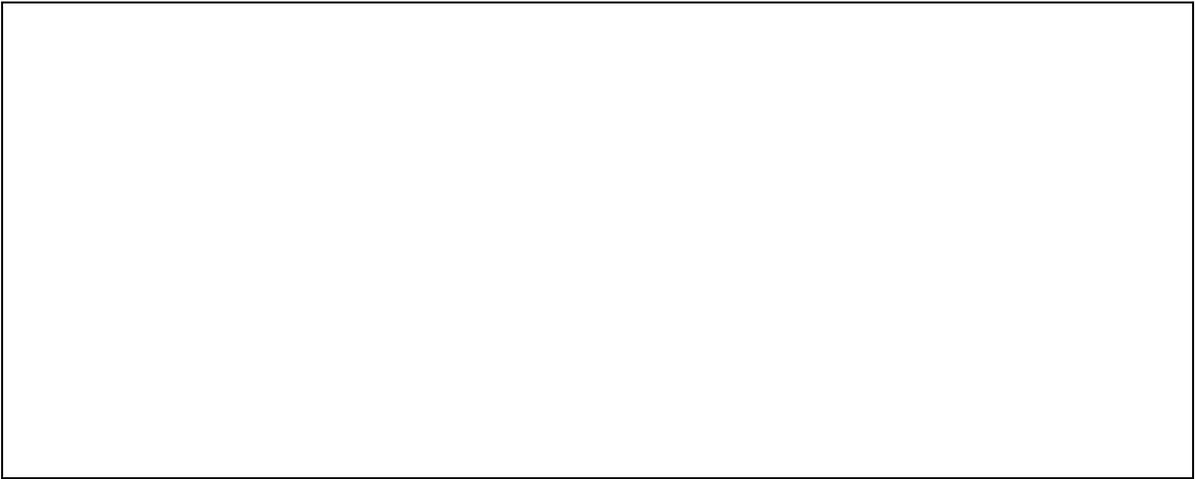
4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more that pays for the upkeep of the common areas of the site. There are probably some [REDACTED] units on this site all paying site fees.

**We know from Companies House records that [REDACTED]
[REDACTED] Their shareholders enjoyed a joint dividend payment for the year of [REDACTED]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.**

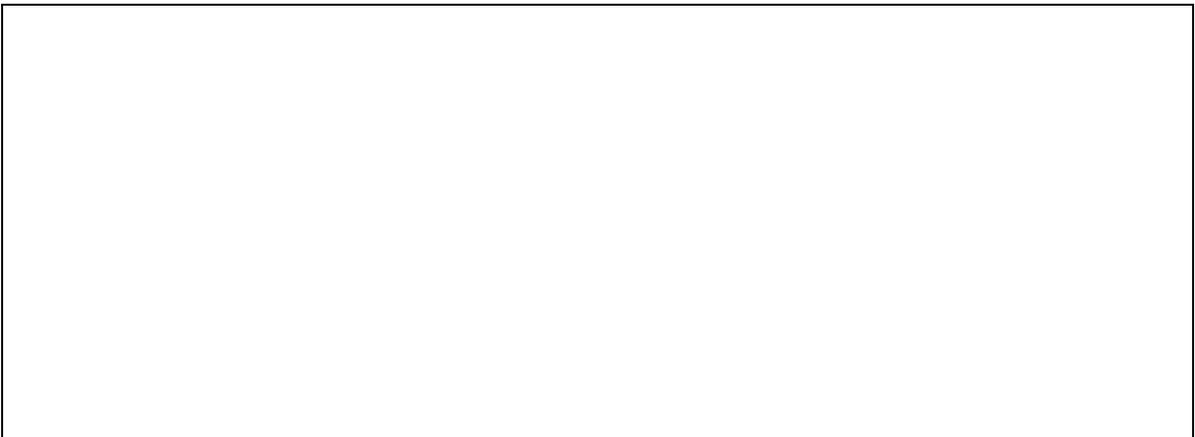
On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.



6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

A large, empty rectangular box with a thin black border, intended for a user to provide a response to the question below.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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- e. A representative body for park home residents**
- f. Other, please state**

Answer:

No to answer (a)
C to answer yes

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

A) No
C) Be abolished does not add to or enhance park or home
D) Owner/s very secretive re: financial mostly.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

On average, owners very secretive and refuse to be open, re this issue.

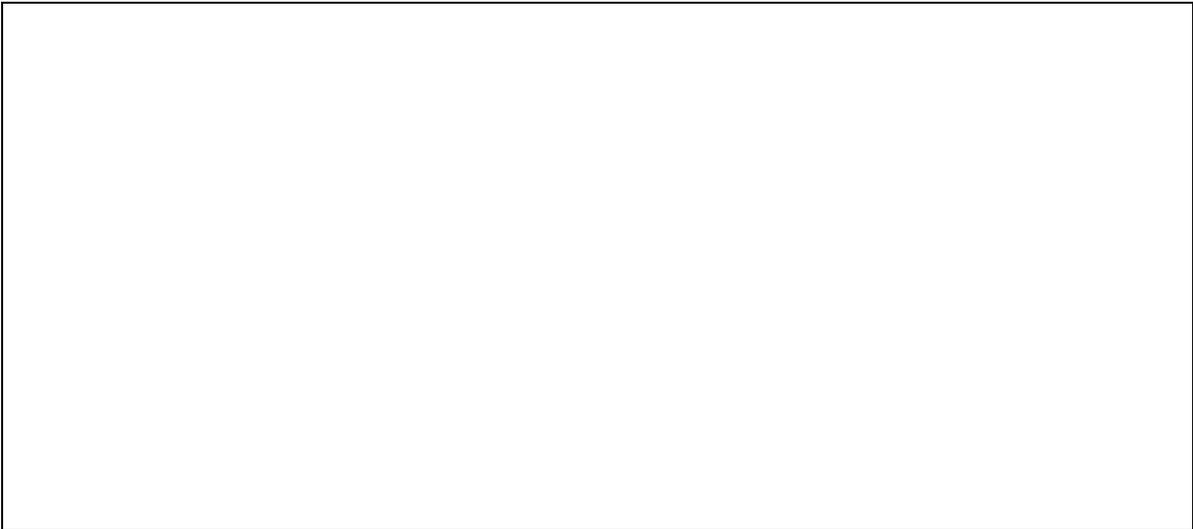
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As and when a sale takes place information divulged from other sources e.g sites, but is very guarded and never brought forward.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Is never divulged, again it is very secretive and not forthcoming, creates major problems.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

As far as we know it's an extremely short term and nullifies it.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The 10% commission is as little used for upkeep as we've said before its secretive.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

More often than not a park home depreciates with age.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

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Make it possible for both Welsh & English to be used as & when possible it would bring Welsh people & English together.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The form very difficult to put into words. If you have a house when you come to sell it you never pay 10% commission so why should O.A.P's have to give 10% commission from their park home. We pay in excessive site fees and object to have monies deducted on sale. Site owners are well kept financially and have an abundance of finances.

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When selling a Park Home 10% commission to the park owner leaves the person who is selling the home short changed. For example if two park homes have been sold within a week

E.G £50,000 – commission £5000.00

E.G £69,000 – commission £6900.00

£11900.00 in a week

Which does not yet again enhance the park a lot of park owners are secretive.

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- f. Other, please state**

Answer:

Park Owner – Resident for █ Years █

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- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

BE ABOLISHED.

This outdated charge effectively traps a Park Home Owner, because unlike a traditional bungalow which appreciates in value, unfortunately a Park Home depreciates, therefore, if for whatever reason a Park Home owner wishes to move they would have far less equity in their property to be able to buy something of similar quality or standard.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I worked out some figures which I obviously cannot support but based on common sense and a lifetime of experience which I believe shows that a site owner can expect to make in excess of £500,00 per year per Park Home clear profit, which would mean on our site of £50,000.00.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

The 10% commission does not give guarantee of income. No business man would rely on this to maintain the viability of his enterprise.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

It is impossible to forecast how often commission would be received therefore I repeat my comment for Question 3 – no business man would rely on this income to main the viability of their enterprise.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I can only assume to pay for the little extras in life such as owning their own helicopter.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

If we believe that Park Home sites will remain viable without the 10% commission charge, then there would be no impact.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

By maintaining their sites to a high standard which in turn will ensure that individual Park Home owners will be proud of their park and encourage people looking for a new home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

First you must consider the individual purchasers situation, most buyers are elderly people who wish to downsize due to either not requiring so much space or need a level floor, bungalows are hard to find, therefore most would view their move into a Park Home as their last move. The 10% commission charge does put a lot of people off buying Park Homes, but due to a lack of reluctantly accept it.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Judging by what site owners add onto an obviously discounted price they pay for a new Park Home from the manufacturer and allowing for preparing a base, brickwork, drainage, services, drives and paths, I would suggest it is probably in i.e. £30,000.00 and upwards.

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12.

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None.

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None in [REDACTED]

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Answer: C

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Answer:

C. A park owner.

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None.

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None in [REDACTED].

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We have lived here for [REDACTED]! The last place we are going to live at. Either leave in a box or a win on the lottery! Which is very unlikely, so for our children to sell our home & leave them a legacy, not have to give 10% to these park owners.

[REDACTED]

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Organisation (if applicable):

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Answer:

A) A park owner of site with ■ pitches, in business for ■ years.
Street lighting, maintenance of roads, landscaping of park including communal areas.

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- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

- a. Be retained at the current level 10%

The commission is necessary to cover costs in providing a good decent park for home owners.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

On average commission accounts for 6% of the income of the business.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On average commission is received twice a year. This commission goes into budget for running and maintenance of the park.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

The commission income is spent on
Maintenance/repairs
Replacement and capital spending
Staffing/administration
Costs incurred on borrowings.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Without the extra 6% income, the business would not be able to cover necessary maintenance and upkeep costs. It would be impossible to keep the park at its high standard without the maintenance works provided by commission income. In the long term the park would fall into disrepair and business would be lost.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

By cutting back on maintenance and repair – the parks attractive landscape features would not be able to be provided.

Re-tarmacking of roads could not be afforded.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Often there is no impact on homeowners as the home is sold by their estate in around 35% of cases. The attractive environment and supportive community provides a perfect environment for homeowners living independently in their senior years, this would be at risk if commission was abolished.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The value of the home on a pitch is increased in value by all the development which had been done in landscaping the park and the level of services provided.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Going forwards if the commission were abolished it would be impossible to recoup the lost income by increasing pitch fees due to controls on pitch fee increase by CPI. I would speculate that I would have to sell the park as it would no longer be financially viable.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The Mobile Homes (Wales) Act 2013 has made it much more difficult to sell homes. The increased time it takes to meet new requirements is adding further cost and time to the process.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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?

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We as park owner/operators strongly feel that a reduction or abolition of the 10% commission fee would make it extremely difficult to maintain the high standards currently provided at [REDACTED]

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Answer:

Resident owner can't wait to get off and pay the site owner [REDACTED]

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Please provide your answer choice and explain the reason for your answer

Be reduced to 5% based on the difference between buying and selling price. Buy £100,000 sell £120,000. £20,000 profit @ 5% = £1,000 to site owner.

Money for nothing, site owner no input in selling process.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Our owner has made £80,000 in the last two years, he makes life unbearable for pensioner residents makes them sell. Legal robbery supported by the Welsh Government.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Severn sales in ■■■ years ■■■ more on market, legal way to rob the elderly, we are held hostage by ■■■■■ who now own nearly every site in England.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

He buys luxury cars, has a mansion in ■■■■■ just bought two ■■■■■
£500,000.

Has never even cleaned the one road once in four years.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Will have to cut back on their luxuries, high pitch fees give a good income to these individuals. [REDACTED] per month for nothing, our park bought for [REDACTED] [REDACTED] years ago now for sale [REDACTED] not a bad profit for doing nothing.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Try to increase pitch fee, pretend to improve park and charge us get rid of older caravans, threaten to sell and make us homeless, more people they evict more new units and more sales commission.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I have been up for sale for [REDACTED] have been honest with potential buyers, never seen them again, can only sell if sale commission is reduced or abolished. No other property in the U.K have this penalty when selling. "Why us".

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Any park home off site is worthless, owner always threatens us with eviction if we speak out, most evil people on gods earth. Will have to go on council house waiting list all money gone.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

We will be able to sell our homes a fair price not having to add the 10% can then afford to move into sheltered accommodation. Not asking for charity have always paid our way, not scroungers.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Make this a stipulation in the site license, no accounts (certified by inland revenue) no license, [REDACTED], deal cash in hand for everything, explain how they live the millionaire lifestyle.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

None. It is not enforceable by law, local councils ignore the act, very well meaning, only benefit is C.P.I instead of R.P.I. we are now owned by an [REDACTED] (no criminal record).

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Welsh will disappear from sites, [REDACTED].

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive

effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Take the sites from present greedy owners. Make council the landlord or better still give residents a chance to run their park. Then more welsh speaking people will feel comfortable in purchasing, run by Welsh speakers for Welsh speakers.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

[Redacted]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

Park Home Resident.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B. Be reduced

Park home prices have increased considerably over the years and this is now a huge amount that pensioners have to pay for the sale of their homes.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We are not provided with any of the details and have no idea how the commission is used.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Commission is charged every time a park home is sold and homes are sold for mainly because the occupant/owner has passed away or become infirmed. The same park home can be sold on numerous occasions but the commission is still charged at 10% of the whole selling price we do not have any information how the income is used.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Answer is the same as question 3.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The charge of payment would be much fairer if it was only charged on the PROFIT the home has made. The park owners are always aware of the price paid for a home and the price the home is sold for, charging 10% on the whole amount means that a house can be subject to this charge every time it changes hands.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

It would mean a cut in the park owners income but it is worth bearing in mind that if a park home is sold through the park home owner he still charges an extra commission or any estate agent would.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I am unaware how this affects a new occupier but would suggest that as park homes are in demand as good retirement homes new occupiers generally pay it.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

No value whatsoever. A pitch base has to be in place before a park home can be sited this is the responsibility of the Park Owner.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Park home residents buy their homes and pay ground rent to the park owners. Residents improve their homes in most cases with new kitchens, shower rooms, bathrooms, general maintenance and looking after their gardens, a park owner should only be allowed a small commission on the profit made. Pensioner's families should not be penalised by the park owners who are taking a large part of their inheritance. Many park homes are now worth upward of £110,000.00 and 10% commission £10,000 is an extortionate amount to have to pay.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

We are not park owners.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The Mobile Homes Act has been extremely helpful.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No effect whatsoever on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The proposed policy charge for park home residents has nothing to do with the Welsh language or its effects.

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As referred to in question 6, there are fairer ways of addressing the commission amount past to park owners, either by only charging on the profit made or reducing the percentage.

When the 10% was set Park/Mobile homes were very much cheaper then.

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Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.

The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, [REDACTED].

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

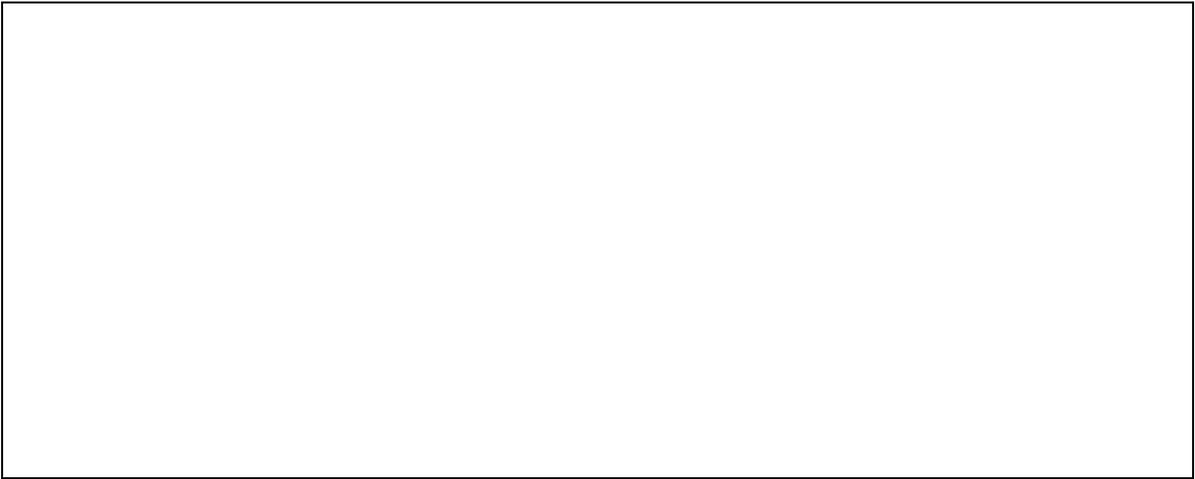
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5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more that pays for the upkeep of the common areas of the site. There are probably some [REDACTED] units on this site all paying site fees.

**We know from Companies House records that [REDACTED]
[REDACTED] Their shareholders enjoyed a joint dividend payment for the year of [REDACTED]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.**

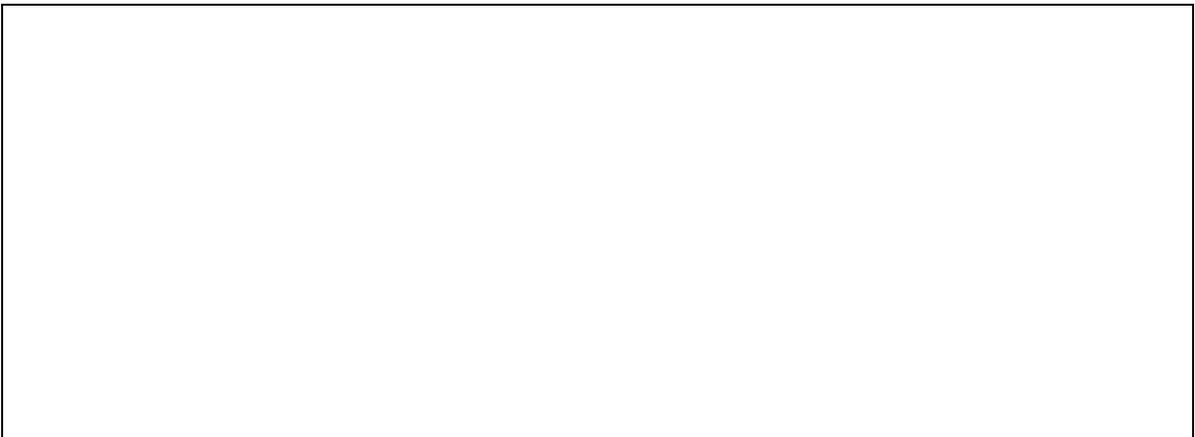
On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.



6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

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12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). Park Home Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished.

Residents can now use Estate Agents in selling the home, they have their cut of 1% to 1 ½% and they money is not used to maintain the site. 10% is a lot of money just going into the site owners accounts.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

On average park home residents move several times during the time on site. When one or other resident passes on this is the time they need extra money not less.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Not known, but on a small site as we are very little is spent on improvements, so the normal ground rent paid each month covers this. The 10% goes into the owners park account and not spent on any improvements.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I am sure that any change to the commission payment would not make any different.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

N/A

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It depends on the site and how much leisure facilities are provided.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Abolition of commission, would make tenants happier able to leave the home to siblings and them receiving the full value of the home.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

N/A

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Not known. No evidence.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

N/A

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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Answer:

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Please provide your answer choice and explain the reason for your answer

C. Be Abolished.

Having paid £120,000 (£12,000 commission) ■ years ago and ground rent of ■ since, object to having to seek enhanced price should we sell to cover commission payment again.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

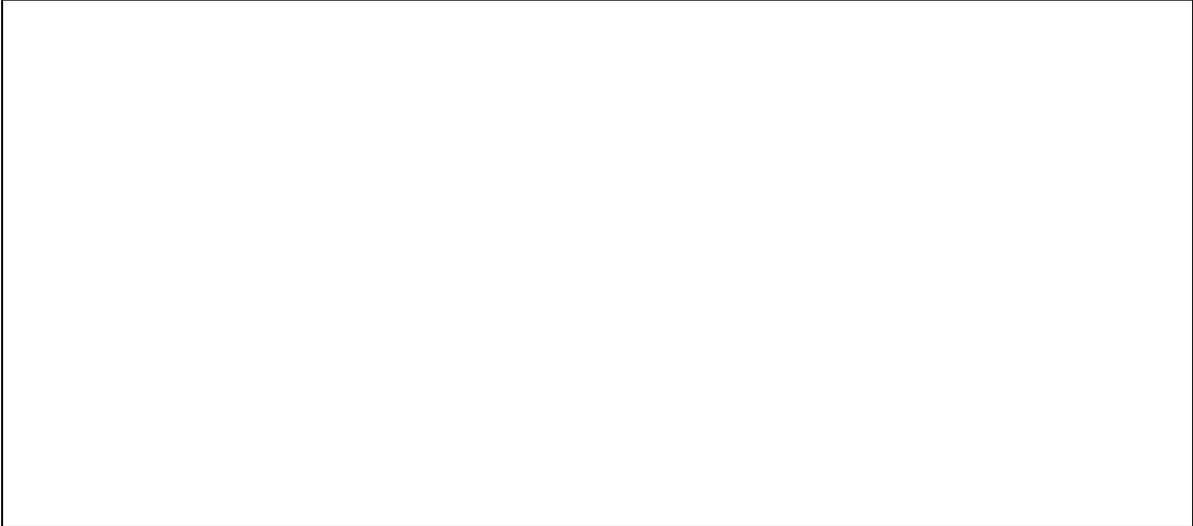
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In the ■ years we've lived here there has been an average of one sale per year.

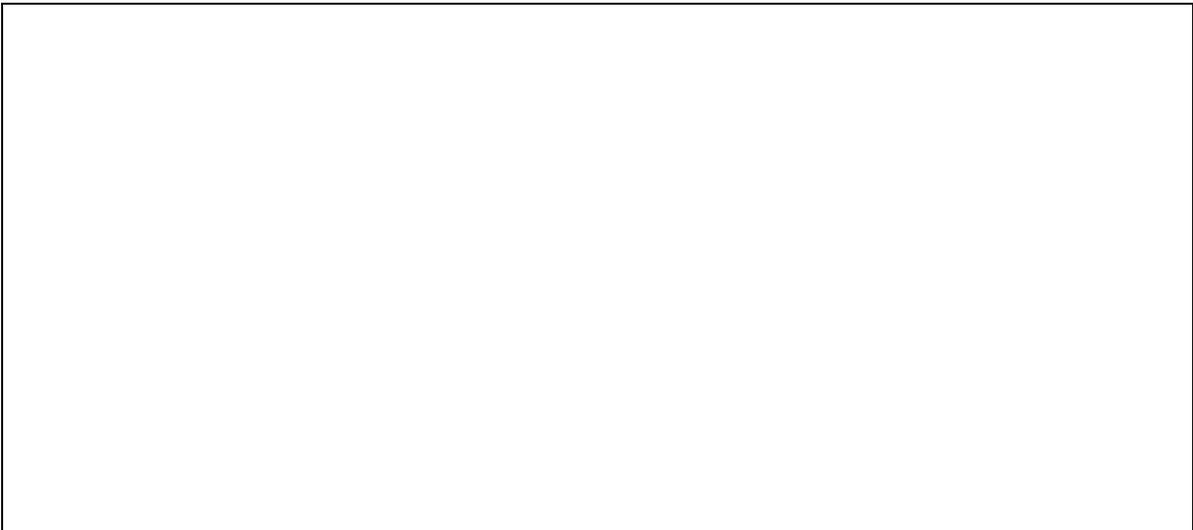
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In ■ years living on the site there have been no improvements made and no evidence of any of the commission used benefitting the site.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Payment of commission delays sale since park home owner is trying to re coop the commission paid on purchase. Usually the owner has to reduce price but commission still payable in full. We currently have one unsold for over ■■■■■■■■.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

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Answer: C

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C. Commission re-sales should be abolished.

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In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, [REDACTED].

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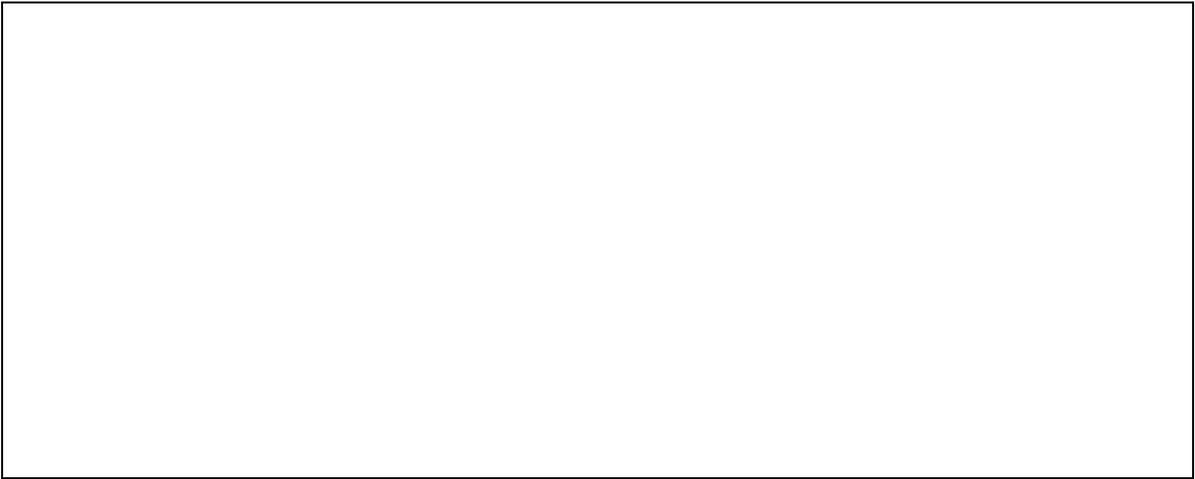
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**We know from Companies House records that [REDACTED]
[REDACTED] Their shareholders enjoyed a joint dividend payment for the year of [REDACTED]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.**

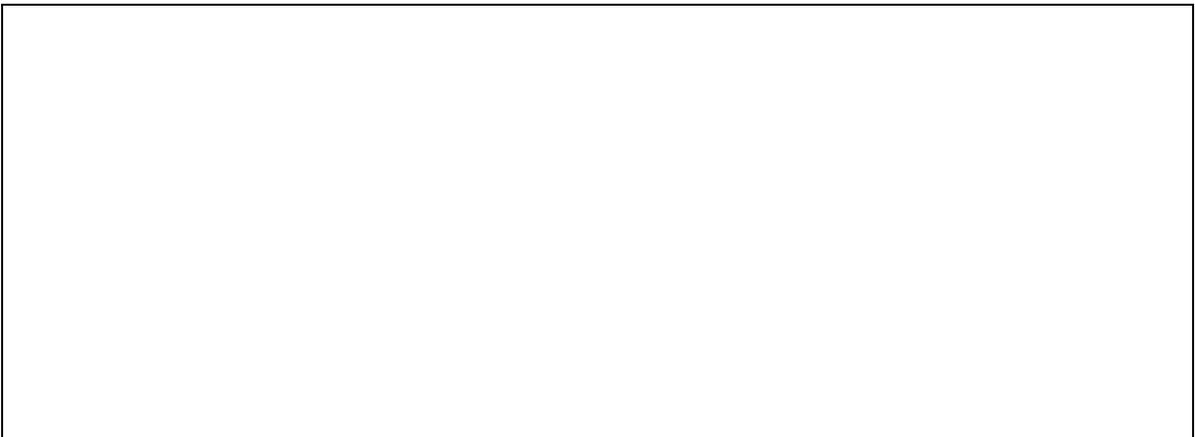
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Answer:

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- b. Be reduced
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- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

B. Be reduced.

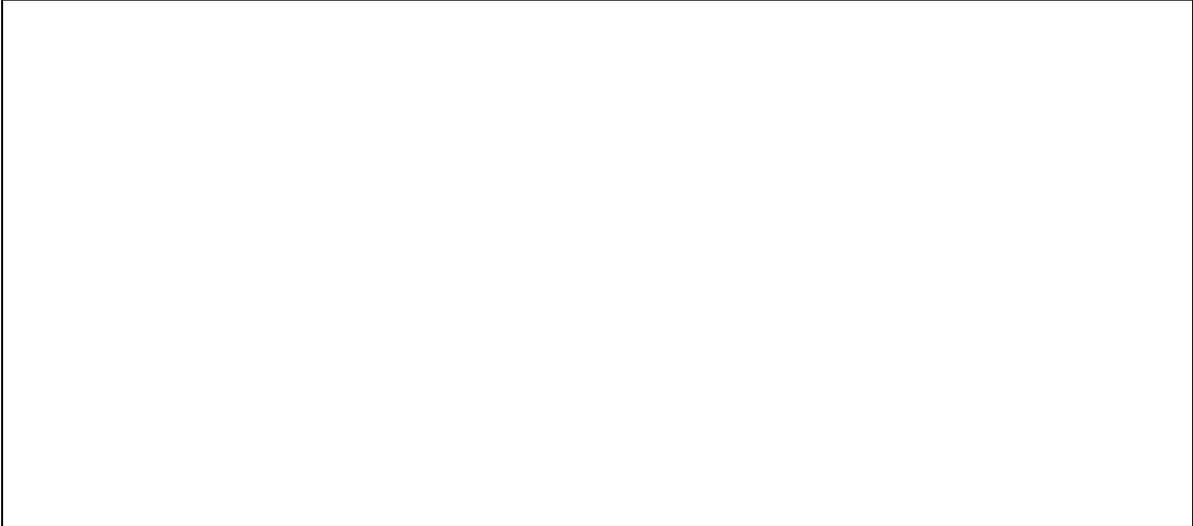
I think that 10% is too much for a owner of a park home to pay in commission. They may of course wish to sell their home, but then of course need to buy somewhere else to live. Most people need the full value of their home they're selling to be able to buy something else to live in.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

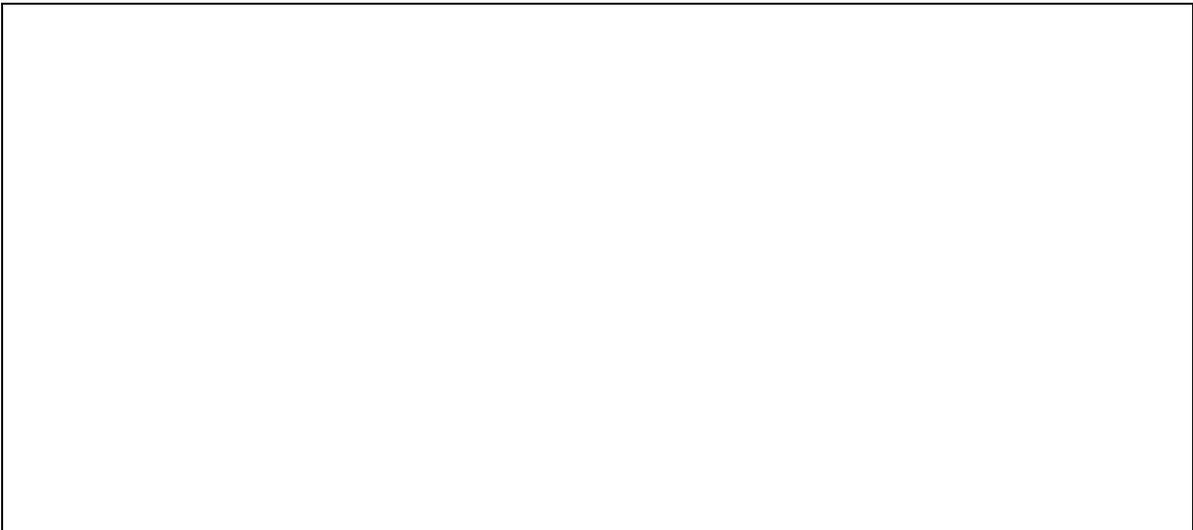
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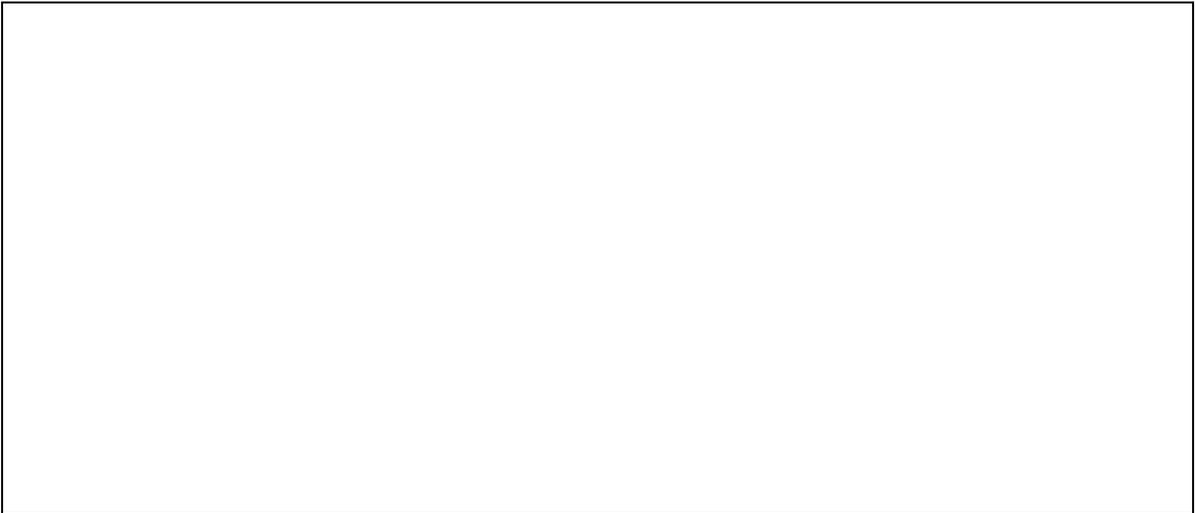
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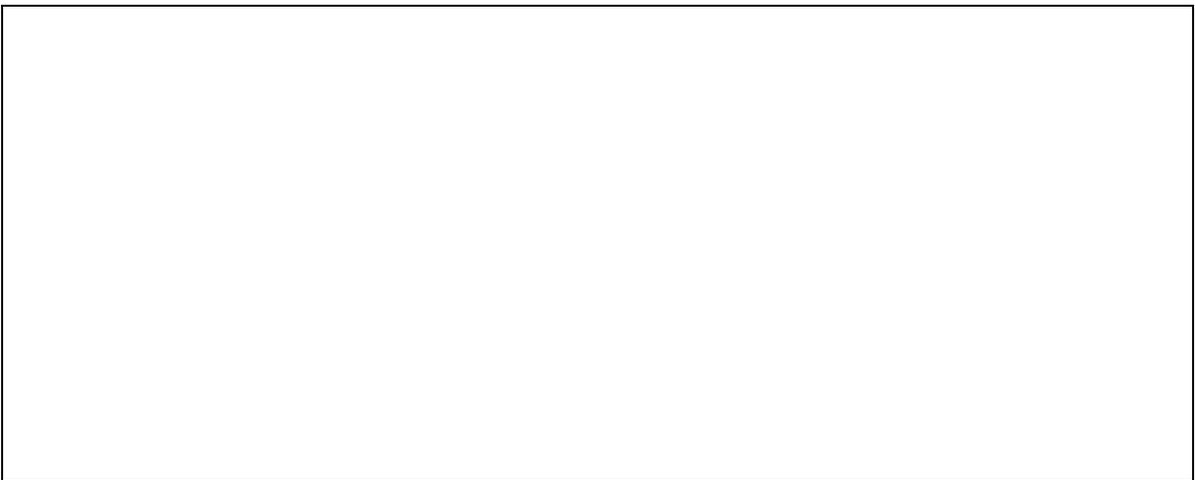
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**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**



10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.



11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

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14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I am sorry that as an ordinary park home owner, I couldn't answer all the above questions.

How ever I have recently made a new 'Will'. I would like to think that when the time comes, my son who is my main beneficiary will be able to sell my home. I'd like him to gave its full purchase value, if possible.

I hope that this law is changed and that my son & other people like him, won't lose as much as 10% of what is in fact his inheritance, from me.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address [REDACTED]
[REDACTED]

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 - e. A representative body for park home residents
 - f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.

The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, [REDACTED].

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

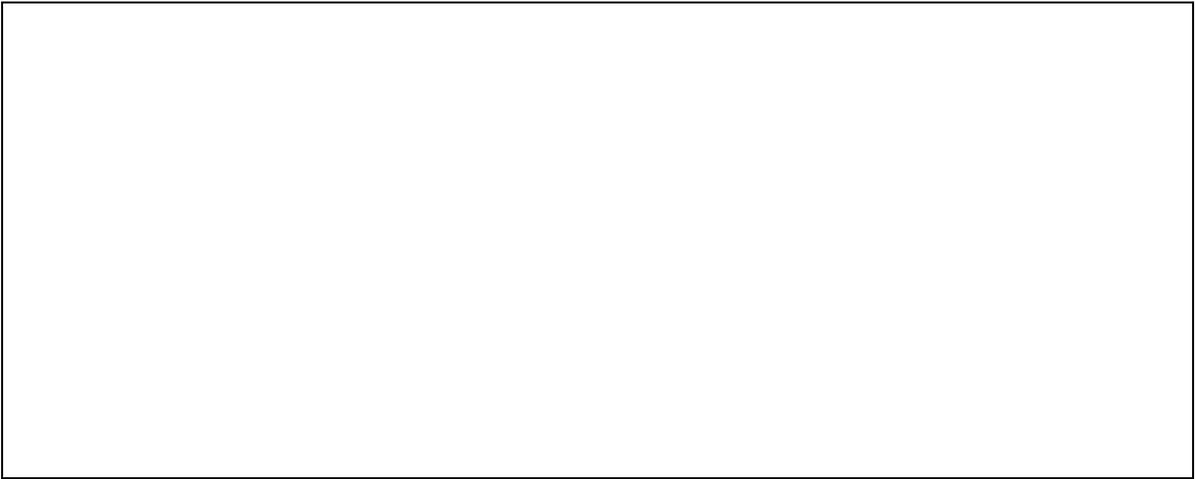
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Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more that pays for the upkeep of the common areas of the site. There are probably some [REDACTED] units on this site all paying site fees.

**We know from Companies House records that [REDACTED]
[REDACTED] Their shareholders enjoyed a joint dividend payment for the year of [REDACTED]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.**

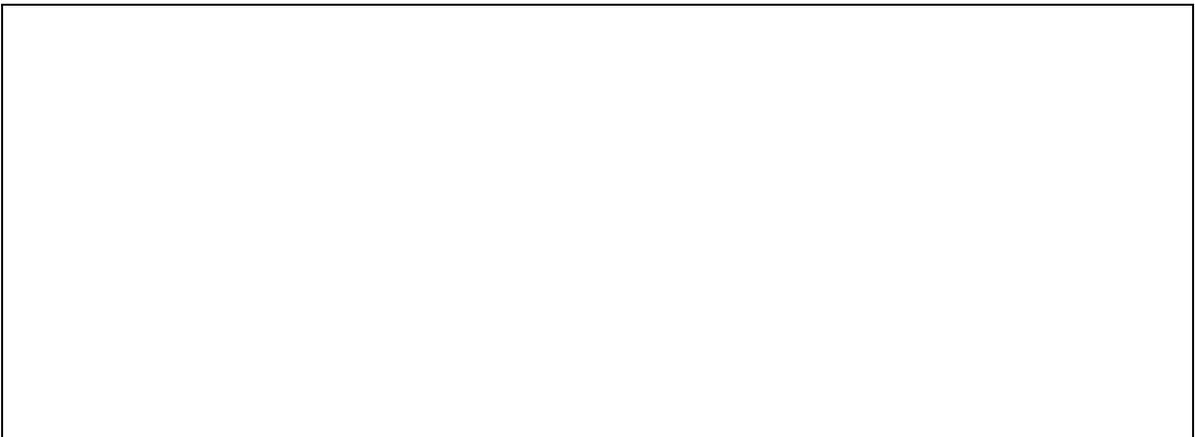
On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.



6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

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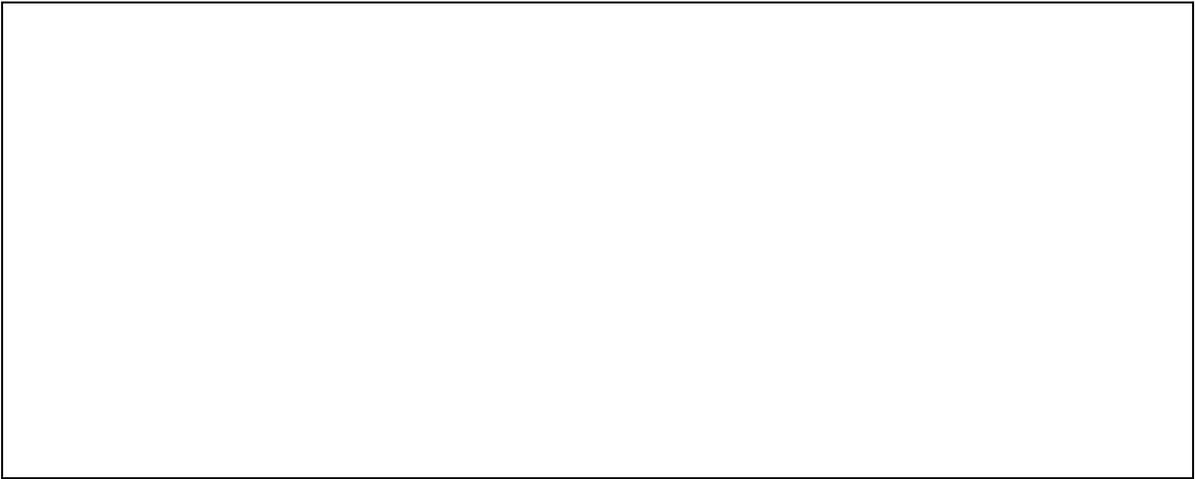
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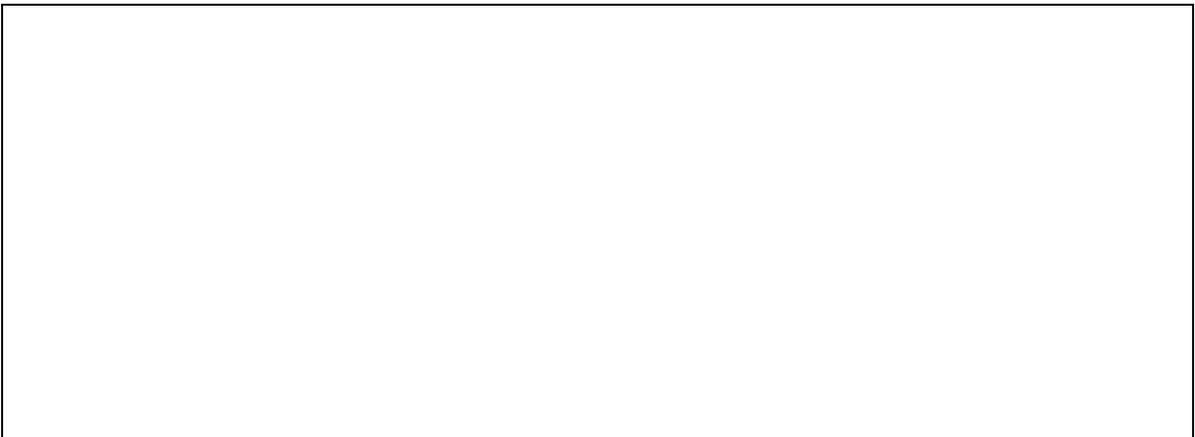
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We are seeking assurances from WG that our comments will remain anonymous and confidential.

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email / telephone number: [REDACTED]

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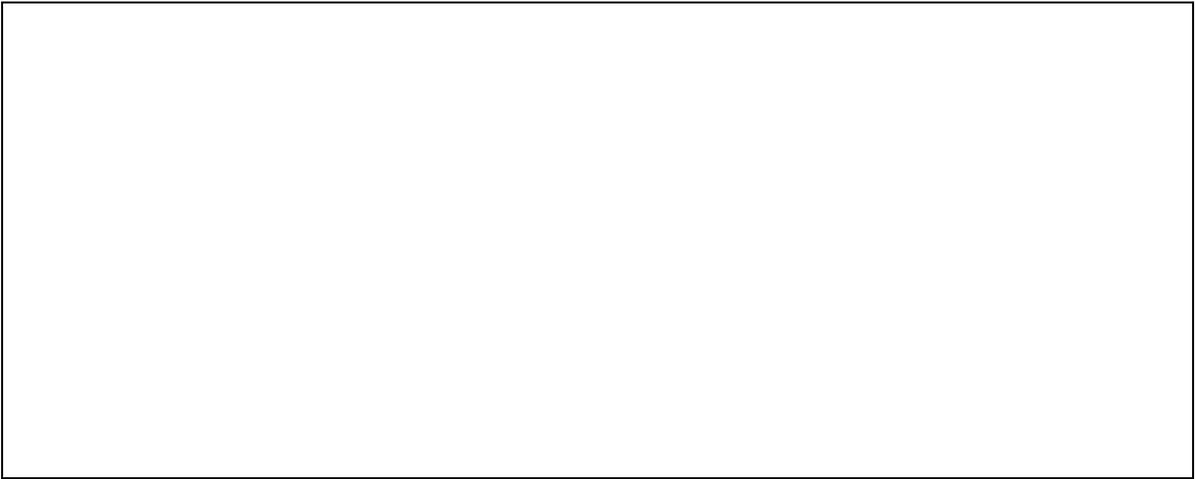
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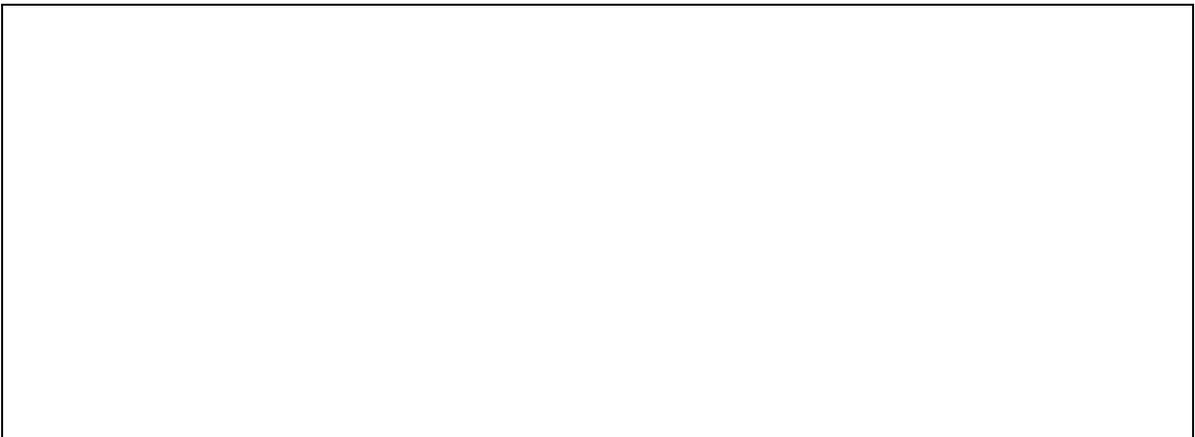
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Answer:

C). Park Home Resident Owner since [REDACTED]

2. Should commission on the re-sale of park homes in Wales:

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- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Be Abolished.

However, if the park owner resells the property then he should be allowed to charge a fee, commensurate to that of an estate agent.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Unable to say as the number of properties sold annually may differ year to year.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Unable to say, as this is a relatively new site so re-sale of homes at present is small.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Unable to answer.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

We have been unable to find out how the commission fee is used. The pitch fee is used towards the site maintenance.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

By presenting the site as a friendly and well maintained place to live, then residents will be happy to stay and make it their home.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

We have not yet encountered this event but would think any potential buyer would be wary about paying a 10% commission in the future and so it could affect the sale of the park home.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The provision of a well maintained and properly serviced pitch on a fully licensed site could be worth 5% of that park home's value.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

By abolishing the 10% commission then owning a park home would become more desirable, so providing direct monetary benefits to site owners, the local economy and to the local authority by their receiving a boost in council tax.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

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12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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I believe these changes will have no noticeable effects on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I believe that residents moving into homes where the Welsh language is heard and used regularly, then they may wish to learn the language.

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Answer:

C).

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- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). The park owner has no input in to the sale.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

No known.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Average 3 homes a year.
I do not know how the income is incorporated into the business if at all?

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not known.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Not known.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not known.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Stops you being able to sell at market value, with enough funds to move.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

About 30%

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

I do not think it would affect the day today running of the park, as very little maintenance is done.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

It has stopped the owner from overcharging on the pitch fee (i.e. C.P.I increase)

In the past the owner has charged up to ■ extra a week. (i.e. 8.6% when the R.P.I increase should have been 3.3%)

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No effect at all.

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None

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Answer:

C). A park home resident

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Please provide your answer choice and explain the reason for your answer

C). Be Abolished.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

This depends on how many are sold privately.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Depends on how many homes are sold. So not able to say if at all. This money is incorporated into the business.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

No idea.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Not able to answer this Q.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not able to provide evidence on this Q.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I think people wishing to buy would buy if 10% was not included. As selling is very difficult when you are trying to sell knowing you have got to give 10% away from your selling price.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Depending on position and location of site.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

If the 10% was abolished I think more people would buy in Wales etc. as these homes are great for retiring old people.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Don't know what the impact has done at all.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C).

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C).

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Unknown.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Unknown.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Park home owner mows the grass, but little else.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Unknown.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Spends little on the park so shouldn't seek to mitigate.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I'm currently selling my home for around [REDACTED], I could sell for under [REDACTED], but have to pay [REDACTED] commission!

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Very little or none!

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The park owner takes advantage of the fact that the buyer is unlikely to ever think of selling.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Made people more aware of short comings.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

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email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer: A

Park owner with permission for ■ units the family started the park in the ■ we are ticking over sustained by pitch fees and commission alone.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

A) Be retained at the current 10% level.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

The income received from commission contributes to income of the park, we have not had commission sale for a few years but there is a unit for sale now.

We will give the Welsh Government access to our accounts on a confidential basis.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Any income from commission is put back into the park.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Money used on repairs and renewals without it the park will not be up to the standard that the home owner wants.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Without the 10% commission we will not be able to maintain the standard we want.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Less maintenance and repairs
Less replacement and repairs
The park road will need to be resurfaced in the next few years or sooner.
We wish to put a heart defibrillator on the park when we have the next 10% commission there is a private home for sale now without the 10% we cannot buy one.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Mostly it is the home owners estate that pays the commission. The home owners prefer the commission as a deferred payment rather than a funding the home at purchase or from pension income.

The downside of any change by the Welsh Government for the buyer and the homeowner on the park will be paying the same price and will be no better off however both buyers and all the others on the park who are not selling may be worse off if they stop benefitting from work and services which the park uses the commission to fund at the moment.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The value of the park home situated on a pitch is about 50% most of the homes owners make a profit on their homes, not sited they will be worth less than they are purchase over the years.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

As we are a small [REDACTED] park without the 10% commission we will not be able to run the park as we would like and may think of selling up if there is a buyer as the (CPI) not sure what this word is higher costs increases.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Willing to give access to accounts on a confidential basis.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

CPI vs RPI on pitch fee reviews.

The licenses now only last 5 years not full time as before.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We haven't identified any impact.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no suggestions.

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). A Park Home Resident (Owner).

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B). Be reduced (Maybe 3 to 4% max)
With homes now generally £150K and above 10% commission and estate agents fees when selling seems somewhat excessive. The last home on the park I understand was sold for £250K.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We have been on this park for about ■ years and have seen about 10 exchanges most have been in the last ■ years.

Say Est. 2 per annum at £14K each (£140K sale est.)

Pitch fee income (mine) } = £28K income

■ = £49K approx.

5% on utilities use mine at ■ units } = £1-2K/ Annum

£78/79 income/annum

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Please see answer to question 3.

Also – I have no idea what us incorporated into a business plan – other than there are only ■ new homes to come to complete the park.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I do not know.

I do know that the pitch fees include park lighting, road maintenance and also maintenance of public areas on the park (as per park agreement)

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Any reduction would I expect reduce income.

However more or less exchanges would also increase or decrease income and as such should not necessarily be relied upon.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

As a resident I cannot answer this question.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Possibly making it a little more difficult to sell because:
I suppose the new occupier would have to have the available funds to pay park owners commission & deposit on balance if loan type mortgage was necessary – therefore needing to have substantial funds in order to transact.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

Considerable,

Our [REDACTED] home was approx. £[REDACTED] we paid £[REDACTED]K (in [REDACTED]). Therefore assume £75K was for ground work and infrastructure and also an element of profit.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Reduced level of income to park owners.

See question 3 and 6.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Helps to improve standard of parks and security of tenure for resident owners.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No detrimental effect.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). A Park Home Resident (Owner).

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). I do not know why there is a 10% commission on the re-sale of a park home and think it is very unfair to be made to do this plus a big burden.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

N/A

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

N/A

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

N/A

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The resident has to increase the value of their property over & above the correct value, in order to justify the 10% commission.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

See above.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Please see above.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

As far as I can gather – the only change so far has been the appearance [REDACTED] [REDACTED] on the site.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

?

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I would like to know why there is a 10% commission on the sale of each park home.
We pay ground rent for the upkeep of the site, but we look after own properties.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): N/A

email / telephone number: [REDACTED]

Your address: [REDACTED]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). My wife [REDACTED] and I, have owned our park home since [REDACTED] [REDACTED].

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). There is no financial reason what so ever, to collect this commission. The amount of pitch fee paid every month by each park home, is more than sufficient to maintain the site.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Not knowing the financial situation regarding the owners, it is impossible to say.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On our site there are [REDACTED] park homes, in the [REDACTED] we have been here

[REDACTED] have been sold.

[REDACTED] are for sale

[REDACTED] have been taken of the market.

([REDACTED] of the sales were due to bereavement)

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Unable to answer this question, media coverage would indicate to improve their lavish lifestyles.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

None what so ever, short or long term.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I would imagine they would attempt to raise our pitch fee, which is completely unacceptable.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Having not tried to sell our home, I am not in a position to say. I know the people that have sold, most have had to reduce the price for what ever reason.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Being in a leasehold situation for the first time, and having never sold a park home, I don't know what benefit the pitch is?

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

As I have already written, there is no earthly reason, for this iniquitous commission to be paid. The residents on our site certainly don't see any benefit.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

To be honest, I don't know, I have not read the Act.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I don't think it will have any affect on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Although not speaking Welsh myself, I have always advocated people to use the language when ever possible.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

One interesting factor is in [REDACTED] years the only work carried out on site, is since there has been this discussion about abolishing the 10% - strange.

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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.

The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, [REDACTED].

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

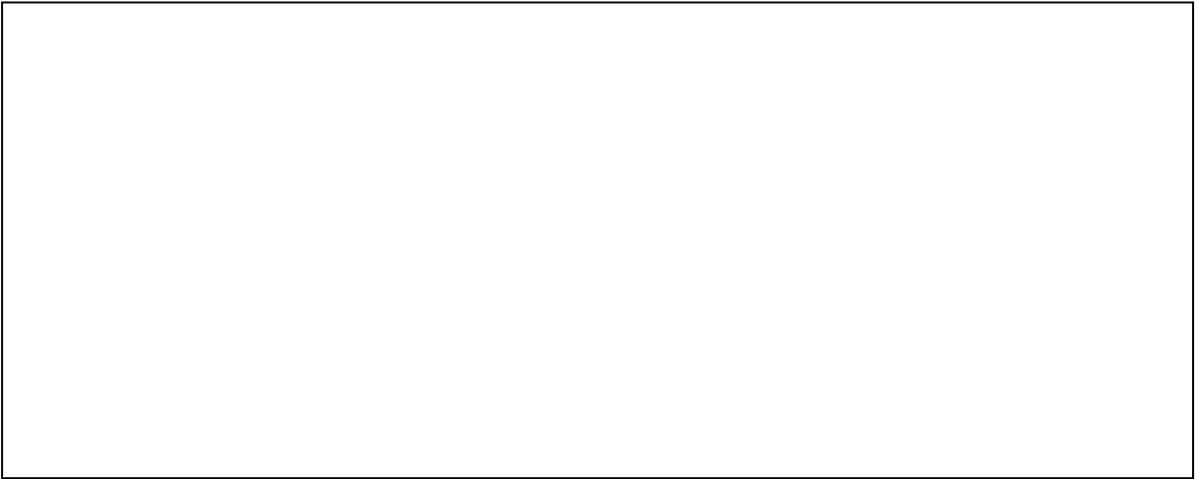
4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more that pays for the upkeep of the common areas of the site. There are probably some [REDACTED] units on this site all paying site fees.

[REDACTED]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.

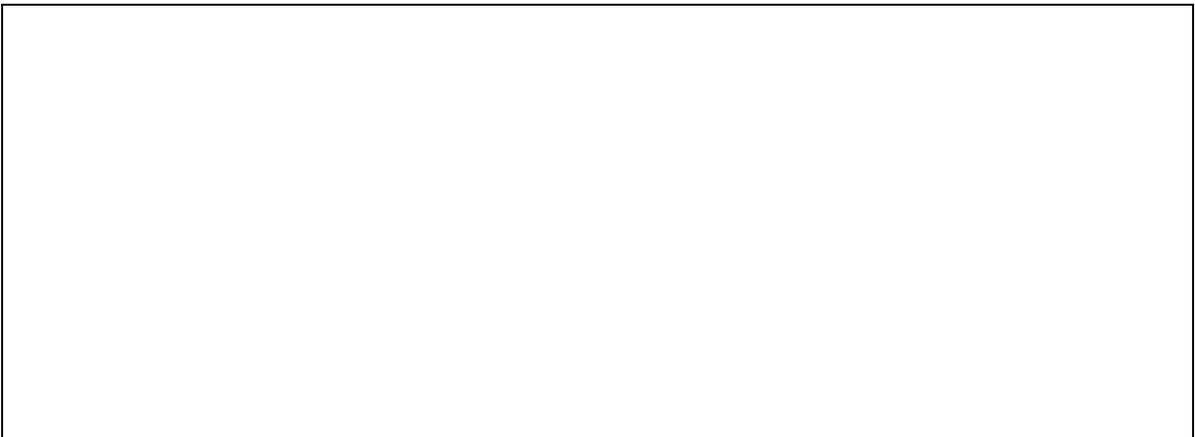
On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.



6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

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12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We have a genuine concern that if it transpires that the owners of our park become aware that we have written to Welsh Government to seek the removal of their commission's fee they could make matters very difficult for us. The average owner here is of pensionable age and we cannot afford to be embroiled in any ongoing and upsetting disagreements over this matter. We are seeking assurances from WG that our comments will remain anonymous and confidential.

**Consultation
Response Form**

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Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). Park Home Resident. Owner.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). Be Abolished

When we buy a park home we pay a siting fee and buy the home ourselves. Park owners own the land and we pay monthly for our home to be on the site so why should he be entitled to commission when we sell.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Unable to answer as we do not know how his business works.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Do not know how it is used in his business plan.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Only lived on site for [REDACTED] and no large maintenance work done in that time.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

When we sell the home it would mean we would receive the full amount of the sale price.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

There would be no risk to the site owner as the next tenant would take over the ground rent. So there would be no loss of the site.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It can put off interest in buying a park home because once they have bought the home and the site owner has his 10%, they do not see that it should be paid again if they sell at a later time.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The only value added to a park home is the services that are in ready i.e. gas, water and electric.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

There are no consequences to the reduction or abolition of the commission, as the park site owner receives a fee for ground rent every 28 days that make it 13 payments each year giving him one monthly payment off all site tenants.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Unable to answer we are tenants.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The park owner cannot block a sale for no reason, and various other things to protect the site tenants.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

All race of people live on park home sites so I do not think it would effect the use of the Welsh language as opposed to English as I think it brings all of us together as a community.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The policy need not change to make Welsh people favorable that English language as most welsh people speaks both languages.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Consultation Response Form

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]
[REDACTED]

Your address: [REDACTED]

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- a. A park owner**
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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). Park Home Resident. Owner.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). Be Abolished

Quite simply I cannot see any reason for this terrible burden. There is no possible justification for this money grabbing from, of all people, the ones that can least afford it and have worked all their lives to support this country and have paid taxes etc., would you want somebody taking 10% of the price of your home?

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I feel this is not applicable to me, however as a park home owner I have eyes and have reason to believe that very, very little of the 10% is ploughed back into the site. There is a mark up fee of well over 100% on new homes sold, we see little of that either.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Once again maybe not applicable, once again I maybe able to contribute. This question is easily answered by any estate agent selling park homes. [REDACTED], who sells nearly all of the park homes in the area, tells me the average period for most residents is around 8 years. A consultation with similar estate agents will give you an unbiased view.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I would clearly love to tell you, perhaps some transparency should be made available for park home residents to peruse, maybe in the form of documentation from the accounts annually.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Sadly I have none as I have never been privy to how my money is spent.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Again cannot say, perhaps the volume of residents would improve dramatically when the 10%burden was removed, no empty homes or plots equals more income for park owners.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The vendors are liable for the 10% of course this puts many people off purchasing a park home. I am trying to sell but prospective purchasers are quite frankly aghast & totally in disbelief when this rule is mentioned, who can blame them. The park owners would benefit when selling homes if the 10% were abolished.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

I cannot quantify the question, how can this be answered when the circumstances are wildly differing from site to site, pitch to pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

I feel I have reasonably stated my case in the previous boxes I have completed, in summary I feel that park residents, parks & park owners would benefit from the abolition of the charge.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Not sure if this is for home owners or park owners? For us home owners it has had a beneficial effect, we feel more secure in our tenure, we don't feel that we are still in a feudal system, as much. The abolition of the 10% would make us feel that we have some rights, something we lack at this moment.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I feel that the Welsh language would benefit greatly as we older people have time to learn the language, as am I, many people would purchase a park home in Wales rather than England, just because of the 10% was abolished.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

As stated above the more of us learn Welsh the more we would use it, thus perpetrating this lovely language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I would like to thank all of you that have read and understood my concerns and also the work you have already completed on my behalf.

Thank you

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Organisation (if applicable):

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[REDACTED]

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). A Park Home Resident.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). Be Abolished

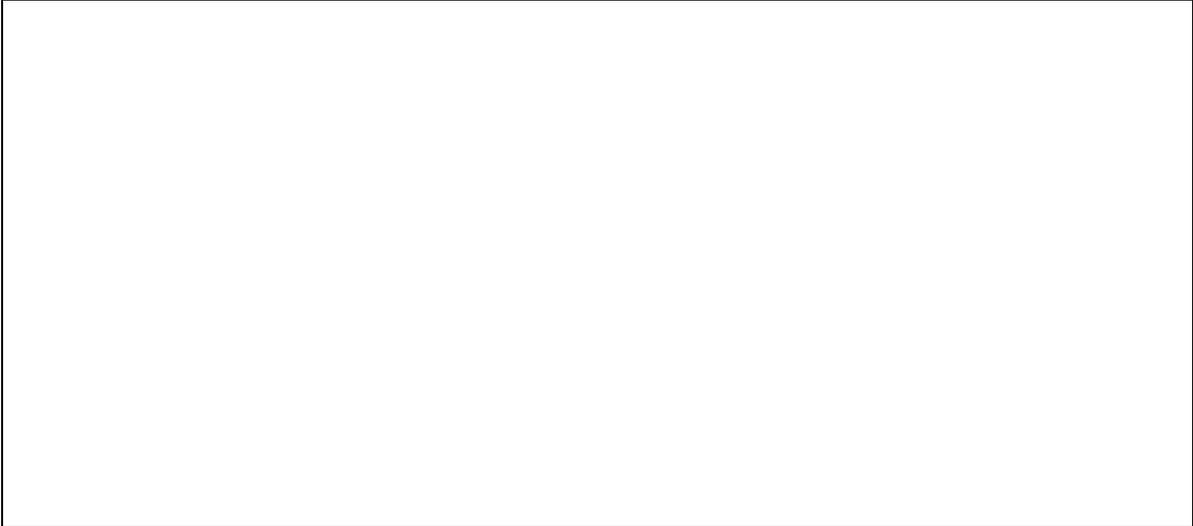
The parks no longer help sell our park home, so we believe should not have the 10%

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

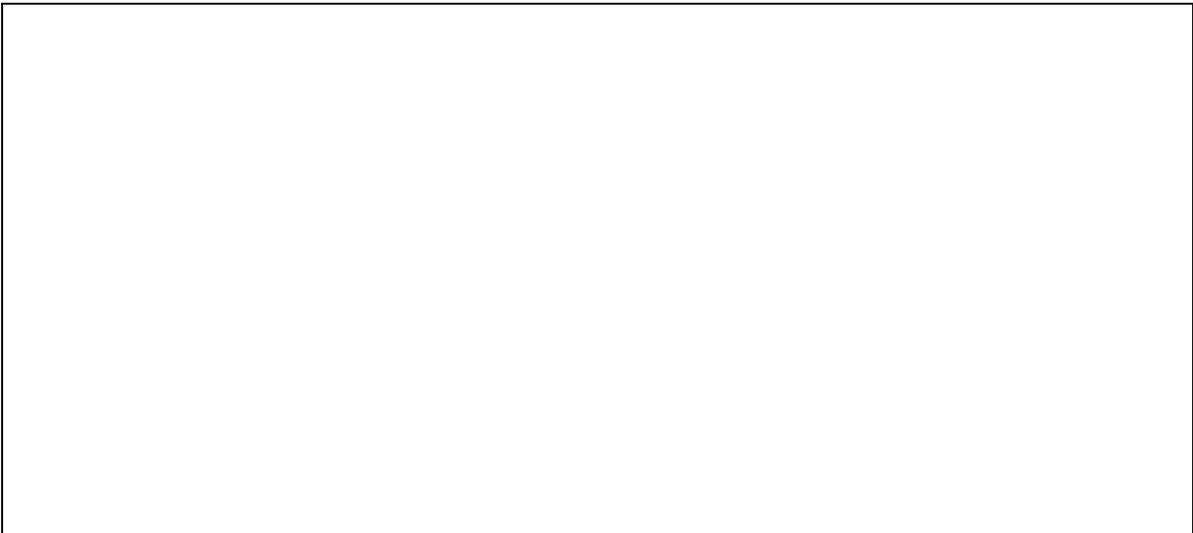
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7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

They will have to pay the site as well as the estate agent who actually sell the park home.

**9. How much value to a park home does being situated on a pitch add?
Please provide any evidence you have to support your view.**

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The seller has to pay twice for selling there home, which makes it a lot harder to find anywhere else – now at a lower price.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

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- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). Be Abolished

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We haven't been told where the commission goes.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

I would think very often as there are a lot of elderly people on our site.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

We haven't been informed where any of the commission goes.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I would not think anything as they receive a large amount of money from the pitch fees each month.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Do not know

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It means its very difficult for you to be able to afford to move.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

We don't have a choice, all units have to pay a pitch fee. I don't think it adds any value.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The park owner in my case is an extremely wealthy organisation, and I am sure the amount they receive from the monthly pitch fees is more than adequate to look after the maintenance on the site.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

No

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Haven't noticed any.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I don't believe it will make any difference.

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). A Park Home Resident. (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). Be Abolished

When moving to a park site we pay a siting fee, but buy the home ourselves. The park site owner, owns the land and we pay monthly for our home to be sited on it. So why should he be entitled to commission on it when it is sold , as it belongs to us not him?

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We are unable to answer this question as we are not privy to his finances and it is never discussed with us.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On average ½ a year we do not know how it is used in his business plans.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

we do not know how the income received is used by the park owner. Since we moved here [REDACTED] years ago only 1 large maintenance job has been done and that was to do with the [REDACTED] to it.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The change of not paying commission would mean that park home owners would receive the full amount of the sale, as it is their property. The site owner did not put any money into the actual home, at point of purchase, but received commission when selling it to the tenant.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

There would be no risks for the park owner if he did not receive any commission, because the next tenant would take over the ground rent, therefore the owner would not have any loss in rental of the site, as it would carry over to the new tenant.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The payment of commission by a new tenant can put them off, because once they have paid for the home and given the site owner their 10% they do not understand why it (the 10%) should be paid again if they want to sell at a later date! Also the site owner puts his own commission onto a brand new home anyway.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The only value added to the park home being situated on a site is the fact of the services that are put in ready i.e. gas, water and electric. However the tenant pays for that to be some by paying a large siting fee to begin with, so there is no actual cost to the park site owner.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

There are no consequences to the reduction or abolition of the commission, in my mind as the park site owner receives a considerable fee for ground rent every 28 days which makes it 13 payments each year, gaining one monthly payment anyway off all site tenants. So in one year he would gain more than 10% commission, when he sold a new or used home on site.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

We are tenants, so this does not apply to us.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The impact so far is that the site owner cannot block a sale for no reason plus various other things to protect the site tenant. Not fare enough to protect them in the sale of the home for them/relatives to receive the full amount of their own money, that could be needed for re-housing or care for them.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

People of all denominations live on park home sites, so we do not think it would effect overall the use of the Welsh language as opposed to the English language, because it brings the community together, so there are no negative effects.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The proposed policy does not need to be changed to make the welsh language more favorable than the English language, because Welsh speakers use the language when and where necessary to the best of their ability to enable people to understand them.

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[REDACTED]

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 - c. A park home resident (owner)**
 - d. A park home resident (tenant)**
 - e. A representative body for park home residents**
 - f. Other, please state**

Answer:

C). A Park Home Resident. (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). Be Abolished

Where this charge applies it is for someone else to justify. Why caravans?

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Not known

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Not known

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not known

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Not known

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not known

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Self evident

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

This is a matter where someone has to justify the charge. I regard it as "legal" robbery.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Not known

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Irrelevant

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Irrelevant.

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None

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Answer:

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- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). Be Abolished because the site owners have done nothing to contribute to the value of the home. They are not selling agents. When you have sold & the new owners move in they will be charged a new pitch fee which will be way above the amount they would legally be allowed to charge the first resident.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I don't know this only encourages a site owner to harass their residents

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

I have no idea.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not know.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

It should not have any impact.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Sorry don't understand question.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

If you sell a house you don't have to pay the local council for that, so when you sell a mobile home why should you have to pay your site owner?

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Depends on the site it may deduct value.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

I have given my view but can't give any evidence.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Not a park owner.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Don't know.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Don't know

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I am English, but I have no objection to both Welsh & English being used.

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- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C). A Park Home Resident. (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C). Be Abolished. At present time when residents or relatives decide to sell their home the park owners only interview the prospective buyers to confirm they meet with the legislation rules & laws of their park i.e. over 55's & no children & abide by park home legislation.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We have no idea!!

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Depending when residents are deceased and when the residential home is sold? I have no idea how income is incorporated into the business, that info would be known by the owners of the residential park [REDACTED]

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not known!!

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Part 1. I am sure the majority of residents would have peace of mind that their money assets of their residential park home would be their to be passed onto their nearest & dearest on their passing and as at present 10% of the sale price going to park owner.

Part 2. No evidence of documentation.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We don't really know?

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It may act as a deterrent of the sale of the residential park home.

1. If selling through estate agents, you would have their commission to pay 1% or 2% but also the 10% to park site owner?

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

That would depend on the pitch location peaceful quiet and mews would be an asset. Also the knowledge that the park owners have a lengthy cause on the park & are a reputable company. Which [REDACTED] are.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

With the average age of 70+ of mobile residential park homes all of us want security and peace of mind in our mature years.

Can supply no evidence.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

I'm not a park owner

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We feel it is the icing on the cake for all park home residents and we would think park owners, knowing that all parties concerned must abide by the Mobile Homes (Wales) Act 2013.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

For the past [redacted] years or so Welsh language lessons have been taught at our [redacted] [redacted], which is attended on average by [redacted] people. My wife is a Welsh speaker [redacted]. I also can speak a little amount of Welsh, having worked as [redacted] [redacted]

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no discrimination issues with any person's language also know that a [redacted] [redacted] is a Welsh speaking person.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

My wife & myself are both in our [redacted]'s & I feel that the way we have tried to be truthful & honest with our statement this we hope will help the new generation of Park Home residents??

**Consultation
Response Form**

Your name: [redacted]

Organisation (if applicable): None

email / telephone number: [redacted]

Your address: [redacted]
[redacted]

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:
 - a. A park owner
 - b. A representative body for park owners
 - c. A park home resident (owner)
 - d. A park home resident (tenant)
 - e. A representative body for park home residents
 - f. Other, please state

Answer:

I am park home resident owner.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Be abolished completely. It is a gross injustice why should a park owner profit from every sale.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I have no idea!!

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

I have no idea every time a home is sold I should imagine.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I have no idea but would like to know please refer question to park owner.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I have no idea again refer the question to park owner.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Any way they legally again I would think

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I have no evidence to support my view. It is a very unfair situation and puts people off buying.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Depends on how well run or not the park is and what the pitch rent is.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

It would make the re selling a park home a much fairer proposition as most home owners improve their homes so why should the park owner profit as the home owners expense?

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I have not had the opportunity to read the act, so I do not know, but I would say not much from where I'm sitting.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

People will speak the Welsh language as and when they want to I cannot understand the logic of these questions it sense on insecurity perhaps.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number:

Your address: [REDACTED]

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If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

Park home resident owner.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Commission should be abolished. If this cannot be done then 1% should be applied.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Don't know

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Sometimes it can be a long time sometimes a short time. We don't know how the income is put into the business.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Again we don't know nobody is told where the money goes.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Don't know.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Don't understand the question.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Don't know.

These questions are ridiculous for elderly people to answer.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

I personally think none.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

My husband and I have been here [REDACTED] years and since 20[REDACTED] our health has deteriorated badly. Purchase price £[REDACTED],000 and because of our health [REDACTED] [REDACTED], but we can't buy anything for the amount of money we would get.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Telephone 

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Don't know

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Don't know.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

My husband is [redacted] years old, I am in my [redacted] year both born & bread in [redacted]
[redacted]

**Consultation
Response Form**

Your name: [redacted]

Organisation (if applicable):

email / telephone number:

Your address: [redacted]
[redacted]

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer: C

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C. Commission re-sales should be abolished.

The current level of commission payments was introduced in 1983. It is now very dated, in fact, it is outdated. My home is privately owned but is on leasehold land. A traditionally built home on leasehold land does attract a re-sale payment to the leaseholder when sold. It cannot therefore be fair or equitable that we are penalised in this way.

In our case there are no on-site amenities available to help justify what is essentially a private tax. Recurring pitch fees more than compensate the site owners for the use of their land when again, in our case, [REDACTED].

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As residents we have no knowledge of the level of site income. This is something that has never been shared with us.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Whilst this is something that needs to be addressed by the park owners, to own a site is a business venture and like all ventures does not come without inherent risks. To expect all residents to pay pitch fees is perfectly reasonable as long as these pegged to the Consumer Price Index which in turn more that pays for the upkeep of the common areas of the site. There are probably some [REDACTED] units on this site all paying site fees.

We know from Companies House records that [REDACTED]

[REDACTED] Their shareholders enjoyed a joint dividend payment for the year of [REDACTED]. This is a hugely profitable business which will not be adversely effected if there is a change in legislation in our favour.

On this basis to further compensate the owners with a 10% sales tax (and each unit could be sold up to three times in its life), is fundamentally wrong.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many park residents chose this lifestyle as part of a downsizing strategy enabling many to release hard-earned equity from the sale of their traditional homes. However, a 10% tax on purchase/sale can mean that this is no longer a more economical solution and rather than buy (as most of us have) we would then consider rental as a more attractive option. If we all were to rent there would be no sales commissions from individual owners and the unit owners would need to embark on a permanent repair and maintenance programme to ensure that Health and Safety issues are complied with.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

A large, empty rectangular box with a thin black border, intended for a user to provide their response to question 13.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

A large, empty rectangular box with a thin black border, intended for a user to provide their response to question 14.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on

opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We are seeking assurances from WG that our comments will remain anonymous and confidential.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

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Consultation questions:

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1. Are you:

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

A Park home resident (Owner) [REDACTED]

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Abolished: These are not static caravans or holiday homes, they are places of residence where people live permanently.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Site owners are no longer involved in the private sales of park homes, why should they need this so called assistance to help them with something they have no involvement with.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

We cannot answer this question as we don't have any forecast of potential park home sales. In our view the 10% commission is an added extra or 'Bonus' for the park owner as its not something that can be relied on as no park homes may be sold on their site for several years.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

It is probably used to fund their extremely extravagant and privileged lifestyle i.e. to buy brand new [REDACTED]

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

In our opinion a change to the payment of commission to park owners would have no impact on the viability of sites. As previously stated, park owners cannot rely on commission to 'make a living as no properties may be sold. Therefore it is reasonable to believe that they are making their living and profiting from the sale of new homes and the yearly site/pitch fees.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

As stated previously, we don't believe there would be an impact if the 10% commission was abolished.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

We believe that it is more difficult to sell a park home than a conventional home because of this. This has been demonstrated to us by the amount of time properties on our park have been for sale in comparison to other bricks & mortar properties in the local area.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

We feel this question is irrelevant as no one in their right mind would buy a park home that isn't already sited on a pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition or restructuring of the 10% commission would make park home ownership more desirable therefore, site owners would be needed to create more of these sites. This would bring them bigger profits than the 10% commission and boost the economy by attracting more people.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

We only know that our pitch fees are not increased to any level that the site owner wants but have to be increased by the inflation index.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We Don't believe there will be any effect on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

We believe that the more people that come to live in Wales the more people may want to learn some Welsh.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We don't have any issues but we have a suggestion. We feel that in order for park owners to feel that they are gaining something, a percentage of any profits from the sale of a park home could be given to them for example, if I bought my park home for £110,000 and sold it for £120,000 I would profit by £10,000 but would then give the park owner 25% of this profit. We think this is a fair and reasonable way forward.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]
[REDACTED]

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 - d. A park home resident (tenant)**
 - e. A representative body for park home residents**
 - f. Other, please state**

<p>Answer:</p> <p>C</p>

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

<p>C. we have limited resources, we have had our home up for sale for [REDACTED], we feel that we are 'Trapped' because of the financial impact of the commission rate.</p>

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Ref: Answer to 2C

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

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13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

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 - d. A park home resident (tenant)
 - e. A representative body for park home residents
 - f. Other, please state

<p>Answer:</p> <p>C. A park home resident owner.</p>

2. Should commission on the re-sale of park homes in Wales:
 - a. Be retained at the current 10% level
 - b. Be reduced
 - c. Be abolished
 - d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

<p>Be Abolished</p> <p>We pay £[REDACTED] a month ground rent We also pay council tax We bought the park home Therefore why should we after pay 10% when we sell.</p>

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

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7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

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**Consultation
Response Form**

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Organisation (if applicable):

email / telephone number:

Your address: [REDACTED]
[REDACTED]

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Consultation questions:

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. A park home resident (owner).

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished.

If a park owner runs is park by waiting for someone to die or sell their home, or he will go bankrupt he could be making life uncomfortable so people sell their homes.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On the park I live on the park owner could wait years to get 10%.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

No proof that it used on the park.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

It would make no change at all, because you don't know when you will have this money.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

There is no risk at all, the risk is running a park on money you don't know when you will get.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

When a new owner is told that as soon as they buy the home, if they sold it in 1 months time they will loose 10% they walk away.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Don't know.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Its money they don't need or do anything for.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The park owner thinks before he does things, not if you don't do this I will have you evicted.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None at all.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Don't know.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
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- c. A park home resident (owner)**
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- f. Other, please state**

Answer:

C. A park home resident (owner).

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Abolish

Providing no increase in rent.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Commission plus rent results in large profits on this park with hardly any expenditure to off set this profit.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

In [REDACTED] when [REDACTED] took over the park the residents were advised that the rents would increase by [REDACTED]%. This had the effect that homes were being put up for sale or selling rapidly.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Does not need commission from sales funds are available from the rent.

Do not know.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

A well tended garden even more so a larger than normal garden will add value to the home.

However on this park there are certain area's where [REDACTED] is a serious problem and a [REDACTED] within the pitch is worth tens of thousands of pounds.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

I do not have faith in the ability of the tribunals to be as fair as the county court.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

[REDACTED]

Consultation Document.
Park Homes Commission Rate, Question 12.
Mobile Homes Act 2013. Site Rules ETC
We are disappointed in the outcome of the site rule consultation, the new rules are not retrospective and apply only to residents who came on site after [REDACTED] bought the park in [REDACTED], which leaves a number of residents including ourselves in limbo. [REDACTED]
[REDACTED]

Welsh Government advise.
Model standards should only be introduced should preserve or enhance the amenity of the land.
Many of the older parks have been situated in pleasant surroundings containing water features, [REDACTED]
[REDACTED]. In the 1989 Model Standards "[REDACTED]
[REDACTED], however this condition has been dropped from the 2015 site license.
In [REDACTED]
[REDACTED]

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How

could positive effects be increased, or negative effects be mitigated?

Hardly ever hear the Welsh language being used.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Applicable to Welsh speaking areas only, the large park operators advertise their parks as multi national.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

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Your address: [REDACTED]
[REDACTED]

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- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

<p>Answer:</p> <p>A</p>

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

<p>A Our site is only licensed for ■ homes. The money from re-sale, that happens on a very irregular basis, is used to help fund improvements.</p> <p>Currently our rent does not cover a living wage for any permanent employee. All work is done as and when funds allow. So loss of this income albeit irregular would not make continuing this operation viable.</p>

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Currently we have had ■ sales in ■ years with average commission of ■ per sale. This equates to £1300 per annum. Our current site makes a financial loss every year for the past 6 years due to legislation changes.

The commission represented an increase to our ground rent rental income of 11% after tax on average over the last 9 years. Our overall income on average over the 9 years would be ■ per annum with the commission.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

For our site we see resale about every ■ years as we only have ■ residents on the site.

Any income has been used on ■, providing ■ for each home and addition of new footpaths and access for vehicles.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Commission paid into business account any income is used on site maintenance or improvements.

Our income after tax is approximately ■/annum. Any commission is use to supplement this income and pay for contractors to carry out certain services.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

The site has been making a loss now for 6 years and barely generates enough income to pay contactors to carry our routine maintenance. There is not enough income to support a full time employee so a reduction in commission or any further legislation that increases the park running cost will result in our termination of the park as a business.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

As a very small business our only mitigation is to look to increase rental in line with the larger sites.

Another option may be for us to look to regain planning permission to use some of the land for housing and sell it to a builder. However this may mean closing the site or disruption that may mean residents move.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Our current residents have no problem selling their homes, most/vast majority only sell when the resident passes away and no homes have been taken over by next of kin so far.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Average property in the area for a small bungalow is £200K. The homes resell at an average £■■■k. A new home sited would cost ■■■■k of which c £5k is for the plot and siting. Our rental for pitches is towards the lower market value so moving to a new site would cost at least £5-£10 k for transport, pitch and siting.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

- Facilities and general site condition would be affected.
- We provided free support to new tenants or help with erection of sheds. This support covers lost income to myself as I need to take time off work. My expenses are recompensed from the commission.

I can't see any material effect. I believe in Wales most residents move here from England because it's cheaper and for the amenities.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

For your records the park is [REDACTED]
[REDACTED]

I am the site license holder and named manager for the site registered with [REDACTED]
[REDACTED]

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): [REDACTED]

email / telephone number [REDACTED]

Your address: [REDACTED]
[REDACTED]

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- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. I am a Park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

I say most certainly the commission should be abolished, caravan prices fall more rapidly than bricks & mortar and this is an extra penalty at no cost to the site owner so once again I ask that this unfair charge is abolished.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

The ordinary tenant does not have this information and I believe the site owner would be very reluctant to give this information.

There is a steady income received by the management, as tenants for various reasons leave the village. A friend of mine left, he sold his caravan for about £[REDACTED] and had to pay the owner I believe he told me £[REDACTED], why should that be? We all pay ground rent as it is

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

We do not know how any of this commission is being used and the village I live on [REDACTED] should be very reluctant to give us any information regarding this, in my experience they are very secretive.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I believe the park village where I live and in surrounding areas such as [REDACTED] would not suffer as the village is always cheek to joule every season, they have also increased their charges for a season from [REDACTED] to £[REDACTED]. They are making plenty of profit without commission charges.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I do not have any documentation to support what I have wrote, they would not give me any paperwork. Can your dept. ask for evidence and judge for yourself? Every single resident I have spoken to say the charge should be abolished.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Obviously the park owner will have his side of the discussion, but as for ours I can see everybody who leaves their park home receive no physical or practical help from the owners, you have to arrange your own move and pay them for it. Totally unfair!!!

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

When I bought my caravan in [REDACTED] off the site owner, I was given [REDACTED] [REDACTED], no official paperwork. When you want to sell your caravan, you have to at the moment factor in the commission you have to pay the site owner, who had had no part in selling the caravan. Totally unfair, scrap the commission.

This question can only be answered by the park owners. The tenant has no way of finding out and it would be nigh impossible to find out.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

This question once again must be directed at the park owners.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

If hopefully the commission is totally abolished it would be a win win situation to help the tenant move on to buying another property. Please abolish this charge.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

I think the park owner would be very very reluctant to supply this information to the Welsh Government but I strongly advise you to ask for this information and judge for yourself the feed back you receive.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

My opinion is the introduction of the act had been fantastic. I have a copy of it gives me a guide of what the rules and changes are, long overdue. Well done, complete the job, abolish the commission.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

If Wales takes the lead in this matter it will encourage people from all parts of the country to start to learn Welsh. A fine language.

I think it is best if you have a focus group to discuss and evaluate the point below (14) primarily to promote the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

As above put the question out to general discussion. Please abolish the commission.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I would like the Welsh Government dept. dealing with the park homes to enforce rules to the benefit of the tenants, this questionnaire had been very helpful.

Thank you.

Please abolish the commission.

**Consultation
Response Form**

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Organisation (if applicable):

email / telephone number:

Your address:

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- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. Park home resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Be reduced

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

It do not help the park in anyway.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On every sale.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

On sale of park home.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

They will put rent up. We would a lot of park resident

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

If not the new occupier but the old occupier.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The consequences would help the seller.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated

or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Please send a form to every park owner [REDACTED]

Thank you.

**Consultation
Response Form**

Your name:

Organisation (if applicable):

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22nd July,

Dear Sir,

I'm writing to tell you that I feel very strongly about the 10% commission chargeable on the park homes. It certainly should be abolished.

I paid £[REDACTED] for my park home in [REDACTED]. I should never have paid that amount. This would have been the price for a fully furnished home.

[REDACTED]

[REDACTED]

One other thing, I told him that I did not want [REDACTED]. Again he ignored my request. He put it in [REDACTED]. It was hard work. I [REDACTED], which were expensive.

[REDACTED]. I'm told that he is very rich [REDACTED]. They go to [REDACTED] a couple of times a year, with his family. This place is for the very rich.

Please excuse me for any errors that I might have made, also excuse the paper. The shops do not sell writing pads anymore.

Yours sincerely,

[REDACTED]

P.S I would like this letter to be anonymous please.

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C.

I was not told when I bought my home about the 10% and did not have my agreement for 6 months. This park is in an awful state, we have tried to get help from the local council assembly members and our local M.P what a waste of time.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

There has been not a thing done to improve this park so why should they get any commission.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

They try to stop you selling, if you have a buyer they will tell them they will put [REDACTED] [REDACTED] next door to them. Because they want to sell them a new one, more money for them.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

It goes straight in their pocket.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I can't afford to move after paying 10%

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

This park is a mess and all authorities will do nothing to help us. The evidence is at the local council and the tribunals we have been to, the Welsh Assembly are a waste of time and made things worse.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Can't afford to buy anywhere else.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The owners make huge profits on the sale of homes.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

As I said the Welsh Government have made things worse, they did not do there homework. Everything is on the side of park owners. We can't get any help from anywhere.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

My answer is in 10.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

I think everything printed in Welsh where people don't speak it is a waste of money, Wales should spend our money more sensibly.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I would never have bought a park home if I knew then what I know now.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

A Park Owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

N/A.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

N/A

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

No idea, no money is used for upkeep of this park.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

By keeping the commission, prevents and reduces the ability to move on.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

The park owner has no insight to this park. It only needs to be looked at to see the disrepair its in.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

This question was answered in No. 6!

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The owners receives almost double the value of the new homes, when its sited.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The Welsh Government introduced the mobile home act 2013 to stop unscrupulous park owners. By abolishing the commission park owners will no longer be able to intimidate the mobile home owners or inflate the price to be able to get more commission.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The Mobile Home Act (Wales), appears to have made our situation much worse, there is no one with the skills & knowledge to test it, and therefore set a precedence.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A or none at all!

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Give them the option as you do for braille, & large font in order that people who require the form in Welsh are not discriminated against.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Why should the park owners get this commission on top of the sale, AND pitch fee, when they do not maintain the parks. The condition of the park we live on is in such poor condition, our homes had de-valued considerably, so why should unscrupulous landowners receive 10% of our decreased amount, when they fail to maintain the park to an acceptable standard, as stated on the model standard 2008?

If we were council tenants and was moving out I would not be expected to pay any commission, even as a private tenant, there would be no charge, Even private tenants don't pay anything – A bond is something completely different.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number [REDACTED]

Your address [REDACTED]

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1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

<p>Answer:</p> <p>We have been a park home owner/resident for almost █ years.</p>
--

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

<p>We live on a small park home site owned by █, with █ plots. The ground rent we pay each month, more than covers the maintenance of the park. There are no flower beds etc. to maintain the site is so small, just a narrow grass verge █</p> <p>Continued at no. 15 of this consultation.....</p>
--

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Continued from (No. 3)
As the park owner has no involvement when selling our home, we will have estate agents fees to pay so why have to pay another fee to the park owner!

We, like most occupants on the park, maintain our homes/gardens to a high standard, spending thousands on landscaping etc, replacing appliance i.e new boiler, washing machine etc. all to ensure a good value when selling. When we have passed on it is usually there family who deal with any sale and they should profit in full – not have to give any commission to the park owner.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable): N/A

email / telephone number [REDACTED]

Your address: [REDACTED]

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. Park home resident.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

D. Commission on re-sale should eventually be abolished by gradual reduction. The park owner could instead be allowed to INCREASE pitch fees for a new occupant.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As I am not a park owner I can only surmise the answer. It seems that your questionnaire/survey to them produced little financial information about this. This makes me suspicious that they wish to hide the fact that they are making more profit than they wish to admit to.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

On the park where I live, I bought a pre-owned park home █ years ago. There were █ homes now new ones have come on site in that time bring total to █. In those last █ years 7 pre-owned homes have been resold █.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

N/A

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Losing 10% of the sale of your park home can mean you are not able to move at all. Or all sale prices for mobile homes resale will have to be increased dramatically, again may mean they will not sell

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

The price of buying a park home directly from the manufacturer appears to double/treble if bought/sited on a pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The 10% or any % is a very bad business plan. Park owners should not rely on receiving it. No park owner can guarantee how many resales annually he/she will have.

A much better business plan would be to rely on the monthly pitch fee on all homes. This is a guaranteed income.

Better to gradually reduce commission and increase pitch fees to new occupants, otherwise park owners will not want to spend on maintenance etc.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

As it includes 10% commission, the enlarging of existing park home sites, and also plenty of new sites too. Plus the larger park home companies buying smaller ones or building new ones – adding to their portfolios, makes it appear the industry all together think it a very profitable business to be involved with.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I have no idea why the Welsh language should be affected.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

I refer to answer 13.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

The main issue is the park home owners should open their accounts to you or face losing 10% commission, the onus is on them to PROVE that they need it.

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Your address [REDACTED]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. Together with my wife, I have lived here for ■ years.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished.

When we moved to this site ■ we paid the site owner for the siting and delivery of our new park home.

Why should the park owner receive 10% when we sell, for doing nothing?

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

This question is really for a site owner but as a resident of this site in the last ■ years only 3 homes have exchanged ownership, so the park owner had not profited much from any commission here.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Not in a position as residents to answer what the owner of this site has as his business plan. Recently on this site the site owner had bought homes from relatives of deceased owners, then reselling this making a profit considerably more than the 10% commission he would receive.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

After ■ years as a resident, when homes have been sold here, there has never any money spent on improvements to the site, we all maintain our plots ourselves and keep the site tidy.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

We can only comment on our site (as occupiers) as we do not know any residents of other sites.

On this site only a small percentage of homes have changed hands over ■ years. So our site owner does not make much profit on commission,

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

When a home owner dies and the property is put on sale by relatives they still have to pay ground rent to the site owner until the property is sold – thus giving the site owner continual income.

If a site owner buys a park home from relatives (as stated in answer 4) he can make a substantial profit

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

This 10% commission fee on a second hand home has a considerable impact on selling and buying in the 'sales world' commission is earned (i.e. estate agents). What do site owners do to 'earn' this commission - NOTHING.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

This depends mostly on site location i.e. (costal views), near buses, doctors, shops etc.
Site owners add a considerable amount of money to site on a pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

By abolishing 10% commission in Wales it would encourage park home living to a wider market and free brick & mortar homes badly needed here.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The new Mobile Homes (Wales) Act 2013 gives us more security especially the rules on pitch fee increases and also site owners having to register with the local authority.

On this site we have a number of female owners who are elderly and they get very nervous as regards security of tenure.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

See reply to question 14.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

We do not see how this can make any difference to using the Welsh language. If the site had young children they can still go to a Welsh speaking school and converse together on site.

On our site we have a mix of Welsh and English speakers. We are all retired and integrate well.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

As we pay considerable ground rent for our small pitch and the owner does hardly any maintenance we feel a 10% fee for selling our property is unreasonable. Also the site owner does nothing towards a sale. We would have to pay estate agents fees.

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Organisation (if applicable):

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[REDACTED]

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[REDACTED]

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. Park home resident owner

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished – compromising the resale of the unit.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Don't know

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Don't know

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Don't know

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Don't know

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Don't know

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Hear say from estate agent trying to sell neighbours property.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Didn't affect me as I bought from new and had sited.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

If this is classed as leasehold by the fact we are paying ground rent, surely the lease should carry on to new owner. Abolishing the 10% will make resale easier. As the park owner cannot rely on resale as part of income this should not affect him.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Don't know.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

N/A

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

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Organisation (if applicable):

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

None

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Don't know

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Don't know

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

No improvement

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Don't know

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Negative

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

None

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

None

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

None

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No effect.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C.

I've only just learnt that the 10% is intended to improve the site

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

None

The state of this park home speaks for itself.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

They were being sold fairly frequently but at present there are ■ for sale & ■ empty.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

No idea.

It is certainly not being used to improve the park

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

As it is not being used to improve the park at present it will make no difference

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Don't know

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Negative impact.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

None as far as I can see. At the present moment Park Homes on this site are being devalued because of the state of what should be a lovely site in a lovely area.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

As far as I can see there would be no consequences other than to improve the chances of selling properties.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

None

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No effect.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Don't know.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Form not easy to complete, especially for some elderly residents.

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 - d. A park home resident (tenant)**
 - e. A representative body for park home residents**
 - f. Other, please state**

Answer:

d. park home resident (tenant)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be abolished

D. other

If not abolished use a points system

1. The site owner gets nothing
2. He gets 5% of the sale of the home
3. He gets 10%

That way the site owner would have to keep the site in good order to receive any money from the sale. At the moment our site owner would get nothing

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

The 10% of sales if the homes does not go back into upkeep of the park.

As you can see by the photos enclosed.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

It's hard to say how many homes are sold on average. At the moment there are ■ homes for sale and ■ about to go for sale.

The state the park is in plus the 10% is very off putting to would be buyers.

Again see photo's

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

No one living here knows. It's definitely not going back into the up keep of the park again see photos.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Most people living in Park Homes are retired. The 10% to the site owner plus the estate agents fee takes a large chunk out of the money received and wouldn't leave very much to rent or buy another property.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I have lived here ■ years and the site has dramatically declined in that time. I feel sorry for the people trying to sell their property with the state the park is in.

It would be nice if the site owner put some of the 10% of sales back into upkeep of the park.

The 10% plus the ground fee ■ every month is very off putting to some buyers.

See photos.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It can be very off putting as a lot of buyers cringe having to pay the site owner 10% & ground rent every month.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Buying a park home on site adds a lot of value to the property. Also it takes the hassle out of finding a site and transporting the park home.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The 10% commission charged for the sale of the park home by the site owner is very off putting to some buyers. If the money was put back into the upkeep of the park it wouldn't be so bad. But how many of the site owners do put the money back into the site? If it was bricks and mortar the buyers would not be asked to pay towards the lease. Mobile homes are lease hold WHY are we forced to pay 10% o the lease holder.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

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Answer:

A Park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B. Be reduced.

I think that 10% is extortionate. We already pay £■■■■ per month rent and nothing seems to get done on the site. Obviously we need to pay some money for the upkeep of the site but this is way too much. I don't see why we should pay commission on the re-sale of the park homes and 10% is way too high.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

There doesn't seem to be any money from the commission spent on the site. There are many pot holes.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

There are ■ park homes for sale at the present time but there isn't much interest as the site hasn't been maintained to a high standard and this obviously puts buyers off. If these homes are sold the site manager would get a large amount of commission for doing very little.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Nothing seems to get done and there doesn't appear to be any improvements or maintenance on the site.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Even though a number of homes have been sold in the last couple of years the commission income was not used for maintenance or improvements. There are many pot holes and the site is in a poor condition.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Since I bought my park home ■ years ago I have seen a big deterioration on the site due to a lack of maintenance. Park homes are not selling due to the poor condition of the site.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Estate agents are finding it difficult to sell the park homes because of the poor condition of the site and due to the 10% commission to be paid when selling the home. This is an extortionate amount to pay.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

It is easier for retired people to buy a park home on a pitch. There is no need to buy a park home, transport it and find a pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The 10% commission is much too high and puts people off buying park homes. Some site managers use this commission to improve and maintain the site but unfortunately it doesn't happen on this site. There should be a big reduction in commission to reflect the work carried out with this money.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

[Redacted]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

On our site there has been no improvement since the Mobile Homes (Wales) Act 2013. It was put in place to support and help park owners but has had little effect here.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I can't think of any effect on the Welsh language if the commission rate was changed.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

I can't think of any changes to the proposed policy that would effect the Welsh language.

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- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

Pay site owner £1,000 release fee from agreement.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

None, used to fund lavish life style.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

The only legal business where throwing residents off their land gives high monetary rewards.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Our owner [REDACTED], will spend our money on extending his mansion purchasing his latest play thing a top of the range [REDACTED]

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Not being able to legally rob people will make rouges like our owner, sell up and find another method to increase their wealth.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Make excuses they are improving the park, to secure more income find ways of increasing our utility bills, attempt to increase our pitch fee.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Cannot sell at market value so site owner steps in with a ridiculous offer, in my case valued at £[REDACTED] site owner offered £[REDACTED], we cannot win.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Offered £5,000 to remove from site.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Fluctuating income, cannot be built into any business plan has always been “back pocket money” for site owners, pay £1,000 commission for every sale, keep in place for five years, see how many owners go bankrupt.

NONE

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Insist on all, business, private and extended family accounts be shown certified by inland revenue, confirmed by residents. We pay our pitch fee approx. £[redacted] into a private account [redacted]
[redacted]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Fit and proper person test and introduction of C.P.I positive steps but will always be held back by the extortionate sales commission.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

If you do not abolish the commission rate all Welsh sites will fall into the hands of [redacted] in search of easy money.

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Welsh parks are the most attractive sites in U.K let the assembly promote our culture our heritage and not allow us to be sold off as though we are cattle.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

A prime example of the unscrupulous undesirable element we must keep out of Wales is

[REDACTED]

DO YOU WANT HIM IN WALES

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The site owner will make my life a misery.

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Answer:

C. Park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

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Please provide your answer choice and explain the reason for your answer

C. Be abolished

The percentage potentially may encourage the park owner to keep the house sales more frequent by using unfair means.

The park owner gains the benefit of the improvements the owner resident has put into the home without making any financial contributions themselves.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Not known.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Commission is received by the park owner on every sale or resale.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Not known

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Not known

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Not known

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The person selling the homes automatically loses 10% from the property sale and is still required to pay the estate agent their fee.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Not known

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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- f. Other, please state

<p>Answer:</p> <p>C. Park home resident (owner)</p>
--

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

<p>C. Be abolished</p> <p>When I sell my home I'll have to either buy another more suitable property, which means I need to obtain the full price for my home, alternatively I will have to go into residential care which is very expensive.</p> <p>The owner doesn't do anything towards this only takes his 10%</p>
--

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We never see any accounts from the park owner so I can't comment.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Over the last few years at least █ properties have been resold or sited. We never see the business plan, all the evidence I can provide is the condition of the site, nothing is looked after. Roads not swept, pot holes now quite deep. Grass never cut, █

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

The commission on this site is never used, as stated above the only evidence is the condition of the site, roads, grass, rubbish left on the un-used parts of the park, etc. shrubbery not cut back █

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

On this site there will be no difference because nothing is ever spent on it. The resident Ass. Secretary has photos that he has taken around the site.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Unable to comment

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

I haven't sold mine so haven't any experience, but I would think that any incoming buyers be wary of this.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

I would think none at all.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

There would be no consequences to the Welsh Government.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I think the only impact is going to a Tribunal instead of Court.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

There would be no effects as the park owner never sends any letters, documents or correspondence in the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

I believe that we should be entitled to have correspondence in both languages. I feel we are like second class citizens.

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We never see the park owner, we used to have [REDACTED] the month, now we neither have [REDACTED]

He never comes to discuss things and there is limited help from the council.

I am [REDACTED] years of age and evidently the owner expects me to keep the road outside swept!!! Also keep the weeds down when the grass is never cut.

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Answer:

C. Park home resident (owner)

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- c. Be abolished**
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Please provide your answer choice and explain the reason for your answer

C. Be abolished

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

N/A

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

N/A

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

N/A

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

N/A

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

N/A

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

N/A

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

None, because our park home owner does not apply to them!!

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

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Please provide your answer choice and explain the reason for your answer

C.
Park owners are not involved with the process and costs of buying & selling a park home, so there is no justification in the 10% commission fee.

Commission has to be earned.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Surely the income from the commission fee is pure profit, as residents we pay a monthly fee for the upkeep & maintenance of the site.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

As park home residents, we have no idea how commission fees and our monthly fees are spent.

I think that we should have a detailed annual report.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

If the running of a site relies on commission fees, then there is something basically wrong with the overall business plan of the site owner.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Having bought a park home within the last two years, it was a major consideration, as your investment is immediately decreased by 10%.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

It is virtually impossible to site a park home, other than on an organised site.

Park homes should be able to be sited on individually owned land within the community.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

More people would consider buying park homes if the 10% fee were to be abolished, so freeing up larger family homes on to the general housing stock.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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- f. Other, please state**

Answer:

C. Park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

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- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished

If this home is sold numerous times 10% is taken by park home owners every time!
Why? That is disgusting and robbery!

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

N/A

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

N/A

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

N/A

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

N/A

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

N/A

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

N/A

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

None, because our park home owner does not apply to them!

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

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email / telephone number: [REDACTED]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. Park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished

Site fees are increase annually with no increase in services provided by the site owner. The Mobile Home (Wales) Act 2013 states home owners can sell their property independently of the site owner, so why should they be able to claim 10% on the sale.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Unknown, I don't have access to the site owners accounts.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Unknown, I'm not privy to the site owners business plan.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Based on the answers given to question 3 & 4 how would I know.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

“None” in my opinion.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Apart from maintenance of roads & street lighting, the overall appearance of the site rests with the individual home owners.

8. How does the payment of commission by a new occupier affect a resident’s ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

At present, potential purchasers will be unaware or oblivious to the existence of the 10% surcharge only become evident when they try to sell.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

40 – 50%

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition of the 10% commission together with the Mobile Homes (Wales) Act 2013 makes park home living in Wales a much better proposition than in sites in England, should attract more park home owners in Wales.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Pitch fees cannot be increased by more than the C.P.I inflation index.

The local Authority site license cannot be included in the site fees.

Sale of home can be independent of site owner.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No effect what so ever.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Park home living here caters for the Welsh language with local Authority education courses & leisure activities, on a large scale.

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I would hope that this 10% commission is given great consideration by the “powers that be” & definitely abolished.

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2. Should commission on the re-sale of park homes in Wales:

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- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished

Question 2. Part C

We believe the 10% commission should be abolished because:

- 1) The commission takes away finances from our families inheritance upon mine and my wife's passing.**
- 2) Upon purchase of our park home property the park owner made an initial profit upon my purchase.**
- 3) We also pay monthly ground rent to the park owner in order to have my home situated on the grounds of the park.**
- 4) We feel that this 10% commission is unjustifiable and no reason of justification has been brought to light to explain its need.**

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We feel that the rent we pay is more than enough to cover any improvements which may accure on the park.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

N/A

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

N/A

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

N/A

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

N/A

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

N/A

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

N/A

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

N/A

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N/A

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Answer:

C. Park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

C. Be Abolished

An unjust payment going back over 50 years. The industry has changed dramatically, from cheap caravans to homes costing over £200,000. The park owner making many of thousands of pounds on sale.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

It can only be classed as a bonus no park owner can include this payment in his business plan.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Impossible to forecast.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Again it can only be classes as a nice little bonus.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

I honestly believe the park home industry will flourish without the commission charge. Many more people will buy park homes unless the park owners increase the prices to overcome the bonus they would lose. I am unaware of any park home owners going out of business since the last reduction in 1983.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I do not see any risks. Providing it is a well run site. Demanding a reasonable pitch fee to live there in a popular area and a friendly owner or manager.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Many potential buyers are unaware of the 10% commission charge on the sale of Mobile Homes it is an obvious put off especially when they realise the park owner owns 10% of your property. I believe unknown in any other industry.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Without a pitch a park home is virtuously worthless. You are unable to purchase a home form the manufacturer only from the park owner who then is able to make very good profit from transportation, profit from the purchase and the charge for siting on his land.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

With the abolition of the 10% commission charge and the new legislation introduced in 2014 to improve the lives of older people which was superior to the rest of the UK. I believe would be more desirable to live in Wales.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Park Owner

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Park home residents are grateful for the new legislation they realise at long last someone is listening to them. Pitch fee increases by the C.P.I. instead of the R.P.I. being a major break thru. Plus the fit and proper person and the park owner being removed from the selling process.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Difficult to know as this is not a welsh speaking area.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Again difficult to give an honest answer. Maybe if Welsh language lessons were more available in this area and well published then this could be the answer.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

The most important issue is obviously the P.A.C.E.C report, we were elated to hear the minister had instigated a report only to be disappointed the park owner did not have to give any financial figure fortunately the present minister was also disappointed therefore this consultation. If the park owner co-operate it will only go to prove removing the commission charges all together will not jeopardise their existence.

I have a major concern which I hope you will take into consideration if you ever need to communicate with park home residents again.

Many residents on our park did not receive your flier concerning the commission consultation. If it happened on our park it is fair to assume it had happened on many more.

The only true way is by consulting the council tax list.
“They don’t miss anyone”

P.A.C.E.C made the same mistake.

Yours sincerely,

[Redacted signature]

**Consultation
Response Form**

Your name: [Redacted]

Organisation (if applicable):

email / telephone number: [Redacted]

Your address: [Redacted]
[Redacted]

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

C. Park home resident (owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

B. Be reduced

When 10% was introduced the cost of park homes were lower. Therefore 10% of say £50k was only £5000. Today the average park home is above £100k, 10% is therefore £10,000.

This is a 100% increase. Pensions have not increased by 100%

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

On my site very little money has been spent on the appearance of the site, it looks run down and each month gets worse.

It is not being managed. Minimum effort is being made on maintenance.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

There are currently ■ homes for sale in our site. They are not selling because of the site appearance. Scruffy uncut & generally a mess.

The commission income is obviously not an incentive for management. Firing site managers should be enforced, not just a legislation requirement.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

In our case, it is not.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Don't know.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Don't know

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

It is only a deterrent if the percentage is too high. The sale price should include the percentage so that the buyer knows his total expenditure from the outcome.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Substantial because of the services provided and the infrastructure, if it is maintained to a good standard.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

An abolition of commission would obviously see a rent rise for the site of the park home.

A long term tenant would therefore benefit from keeping a sale commission agreement, but it is currently too high.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Language is not a factor and should not be a factor.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

Language is not an issue and should not be even considered on the subject of commission percentages.

English and Welsh should be treated equally.

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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

<p>Answer:</p> <p>C</p>

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

<p>D.</p> <p>I am aware there are many Park Home sites that are maintained to a high standard, but this does not apply to the site I live on. I feel there should be a point system, similar to the one that is in place for restaurants & pubs, where park home sites are all inspected annually. Eg. 0-3 with 0- no commission 1 – 2.5%, 2 – 5%, 3 – 10%. Attaining the higher rate would hopefully encourage site owners to maintain their sites, thus encouraging sales of homes enabling the site owner to keep reaping the benefits of a paid commission.</p> <p>Please see photographic evidence enclosed.</p>
--

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

This question is aimed at a site owner, but I feel:-

I see no evidence on my site that would indicate the site manager has used any monies, either the site fees or commission income, into the upkeep of the site.

Please refer to photographic evidence enclosed.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Since my arrival █ years ago there have been four homes sold. At the present time there are █ homes for sale, with █ further properties being available later due to the deaths of the occupants. The prices range from █ to █, which would afford the site owner/manager a large amount in commission income, but I fear none of it will go back into the site for any form of maintenance. Receiving the commission depends on the sales but the condition of the park a present is putting of any buyers.

I am unaware of any business plan for the site.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

This question is aimed at a site owner but I am unaware as to what the site owner/manager does with any monies received by commission income, or site fees for that matter. Nothing appears to be have used for any improvements or maintenance on this site, but I would like to point out there is a █ site which when viewed █ is immaculate and run by the same site owner/manager.

Photographic evidence of my site enclosed.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Again, question is aimed at a site owner but:- I currently pay £[REDACTED] per month in site fees these have rise from £[REDACTED] per month over [REDACTED] years. Five homes have been sold in that time, one sold [REDACTED] times, in this time for which the site owner/manager has received commission income. [REDACTED] there has been no monies spent on maintenance, the roads being in poor condition [REDACTED] so why would anyone want to by a home here. All buyers are retired & on a limited disposable income & giving away 10% of the price they paid for their new home is off putting when they see there is no evidence of the commission income being used on the care on the site. We are in a catch 22 situation – no homes sold, no commission income no monies for maintenance resulting in further degradation of the site & devaluation of homes.

This brings into the conversation the comments in Q2 regarding a points system.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Question again aimed at site owner but:-
Since my arrival the general appearance of the site has deteriorated due to lack of maintenance by the site owner/manager. Homes that are for sale are not selling due to the general condition of the site thus no commission income is being received by the site owner. I feel that due to the lack of foresight by the site owner/manager to use any monies received towards any maintenance is devaluing the homes for sale & the lack of interest of new buyers. Again as Q6, the catch 22 situation exists.

Please see photographic evidence.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Due to lack of maintenance the site no longer looks appealing to many buyers. The main reason for homes being for sale is due to the death of a resident. Estate Agents are struggling to sell the current properties for sale due to the need of the buyer to pay the 10% commission and the condition of the site. This all means that by the time the homes are eventually sold, back site fees, council tax, estate agent fees plus the 10% commission mean the families are left worrying over the sale thus adding to their grief of loss over a family member.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Most buyers of park homes are retired with a minimal disposable income. Therefore a park home already situated on a pitch is a much more viable proposition than buying one then getting it placed on a pitch in a park. The 10% commission would probably be less than paying for a new home, transporting it & placing it on an empty pitch.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

To buyers the 10% commission fee can be off putting. I appreciate there are site owners who do use this income for repairs & maintenance, but this case is not what happens here. Again repeating myself, I feel a rating system mentioned in Q2 would be off help to improve all park home sites. Site owners should be prepared to show a business plan showing their plan for utilizing the commission income received to their council or the Welsh Office if requested and be made accountable for any neglect or deterioration on their site.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I was under the impression the Mobile Homes (Wales) Act 2013 was put in place to help & support all residents of park home site. On my site it has had little or no effect. In fact I feel the intimidation & bullying by the site manager appears to have increased & there appears to be no where for us to go to get help & support.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I'm not a Welsh speaker.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I'm not a Welsh speaker.

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- e. A representative body for park home residents
- f. Other, please state

Answer:

F

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Whilst we are sure these are a number of well maintained park home estates, sadly ours in not one of them. We suggest a star rating be introduced. 1,2 & 3 stars could command 0%, 5% and 10% commission respectively. This would encourage site owners to improve their parks. Higher rate parks would improve the saleability of homes. The park owner would reap the benefit of this system.

Photographs of our park home estate enclosed.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We don't see any improvement of our park. The commission earned by the park owner is not put back into the upkeep of the grounds. Again I refer you to the enclosed photographs.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

There have only been [REDACTED] properties sold in the last three years. However, there are currently [REDACTED] properties for sale, with a further [REDACTED] to go up for sale soon due to the deaths of the owners.

The price of the properties up for sale range from [REDACTED] up to [REDACTED]. The sale of these properties will generate a very healthy commission pay out for the site owner, which will not improve our park at all.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

We do not know how the commission is used, but we do know where it is not being used for the improvement of our park.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

We pay the park owner £[REDACTED] per month pitch fees. This should go towards maintenance of the park. The owner does not spend any of this money on maintenance. The roads are [REDACTED].

[REDACTED]. The area is an absolute eyesore [REDACTED]. (please see photo)

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We have lived on the park for over [REDACTED] years, and have seen a dramatic decline in our living conditions due to lack of maintenance of the grounds. Our property, in this present environment will have depreciated considerably. Indeed we would have trouble were we to try and sell it in the current location.

Added to that a further 10% commission would render it unsellable.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Local Estate agents struggle to sell park homes. Partly due to the current commission scenario. Together with estate agent fees, solicitors fees, pitch fees and council tax currently standing at £■■■■ per month, buying a park home is not a viable proposition for many elderly people (the age limit on these parks is a minimum of 55 years). On top of all this grieving relatives are then to lose 10% of their inheritance, as well as other monies required to deal with a loved ones estate.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

In it current state the park homes on this site have actual depreciated.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

As stated in Q2 we think a star rating would improve all aspects of park home residents standard of living, whilst the current across the board commission rates apply, sites such as ours will continue to decline.

Site owners should be made to show evidence of what commission is being used for and should be made accountable for negligent practice.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We are English so don't see the relevance of this question.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

A large number of residents who live on our Park have found this questionnaire very difficult to understand.

As far as we are aware the terms if the park owners conditions of his license requires him to do annual [REDACTED] throughout the park. This has not been done since March and April 2016. Surely this is a health and safety issue???

**Consultation
Response Form**

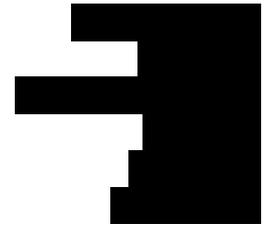
Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:



July 17th 2017

[Redacted]

When I moved into 'Park Home Living' I read the rules & knew exactly what I was agreeing to [Redacted] years ago.

The only thing that has changed is the Welsh Assembly re rating the council tax band (not Applicable in England). This is the most galling of any park home living expenses in Wales.

If you don't like the rules don't join.

The only other problems we have is getting maintenance jobs done. Does not seem to be most experienced labour in Wales. We only appear to get cowboys.

Yours

[Redacted]



[Redacted]

[Redacted] is a neat fully developed park home site. We have lived here for the past [Redacted] years, and during that time very few homes have been re-sold, usually due to resident's ill health.

We all buy into a park home lifestyle knowing the rules, and we are happy to continue paying the commission rate should we ever need to move.

With our regards

[Redacted]



19.07.17



When we bought our Mobile [REDACTED] years ago we agreed to the 10% we enjoy living at [REDACTED] [REDACTED] and hope we can stay the rest of our lives here.

If anytime something should happen to us then the Mobile goes to the family, as we never see them don't care how much they have to pay.

Yours sincerely





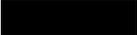
31.07.17

,

Our life at  as been near perfect the friendship between management and ourselves couldn't have been better. As you may know we spent some years working in the industry & visited many parks some very large, but managed by people only interested in finance.

At  it as always been will it be good for the residents, I do hope the government leaves the pitch fee commission rate we all agreed to alone.

Yours sincerely





19.07.17

[Redacted]

My wife & I have lived at [Redacted] for the last [Redacted] years, and have watched the park develop into an environment suitable for elderly people in retirement. Our hope is to remain at [Redacted] for the rest of our lives.

The percent commission on the sale of our unit subject to a member of family not requiring it is a small amount to pay for the pleasure of having lived here.

We would like to thank everybody who have made our stay at [Redacted] memorable.

Yours sincerely

[Redacted]

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

I am the owner of [REDACTED]. I purchased this Park in [REDACTED], and have spent the last [REDACTED] years creating the mature and pleasant community of [REDACTED] homes that it is today. For several years now, the Park has been fully mature i.e. all the pitches are occupied.

The Park today is unrecognisable as being the same business we purchased; at that time the Park was completely run down, with no investment, the homes were condemned as unfit for inhabitation, and the only regular visitors were the local constabulary [REDACTED].

Working with the local council [REDACTED], we gradually cleared what was essentially a wasteland, invested in the service infrastructure, laying new sewers, bringing on mains gas, building roads and street lights. We replaced boundary fencing and built a gateway to the Park which enhances the appearance of the park for the Park residents, local homes and passers-by on the main road outside. During development we have laid new bases for a gradual transformation into what the park is today. Please see below for some photographs of "THEN" and "NOW".

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

I strongly feel that the commission rate should be retained at the current 10% level.

Our Park is a mature site, and as such we only receive income from pitch fees and any commissions which come our way.

Pitch Fees: As we started to develop the site from its ramshackle beginnings, we kept the pitch fee deliberately low as recognition to our residents that we were a work-in-progress. Pitch fees were raised annually in line with the RPI, but not every year. Some years the RPI was so low it wasn't worth the effort. Consequently, with the introduction of the Mobile Home Act 2013 and the capping of pitch fee increases to the CPI, we believe we are amongst the lowest pitch fees in the country at just [REDACTED]).

Commissions: We have a very low turnover of residents. Many have been with us since the early days, and have no intention of moving on. I have revisited the reasons for the [REDACTED] commissions received over the last [REDACTED] years. [REDACTED] paid from the estates of deceased residents [REDACTED] due to the residents needing to move to assisted care places and [REDACTED] due to the resident moving out of a Park home into more traditional accommodation. We pride ourselves on creating an environment where our residents thrive in the community created, and support one another, and want to stay with us.

The combination of low pitch fees and few commissions does not give us a huge income. In the following questions I will show that the commissions we receive are essential to the core running costs for the Park, and abolishing this line of income would push us into a deficit financial position.

[REDACTED]

[REDACTED]

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

The following table demonstrates how integral the commission received is to our income:



This shows that a significant amount of our income is credited as commissions. To get a balanced picture this also needs to take into account the expenditure against this income, to see the effect of commission on the profit/loss of the business:

As a business, the Park has shown a small profitability over the last two financial years. However, should commissions be abolished then we would have been in a deficit position for all three previous financial years.

I am willing to give the Welsh Government access to the accounts lying behind these figures (on a confidential basis)

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

This is a table of the actual number of commissions received at by us for the last three financial years. I will provide confidential access to the accounts behind these figures.



[REDACTED]

We incorporate this into our business plan by taking the average value of the commissions over the previous 3 years to be the budgeted value for commission income. We use the average over three years for the smoothing effect this has. There is no way to predict which homes are likely to be re-sold, and the value varies significantly depending on single or double units, and the prevailing housing market conditions.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

The commission income is not isolated from the pitch fee income. Both are integral funding the expenses of running this Park. The main areas of expenditure are repair and maintenance of the communal areas and gardens (painting, grass cutting, tree maintenance, and fence panels, etc.), upkeep of safety equipment (fire hoses, alarms, and signage), transport costs, and staff time (management, administration and book-keeping).

In the early years of development, which were focussed on building a strong infrastructure, the capital expenditure was funded from sales income. This was invested in:

[REDACTED]

More recently we have listened to our residents, some of whom did not [REDACTED], and created a [REDACTED]

[REDACTED]

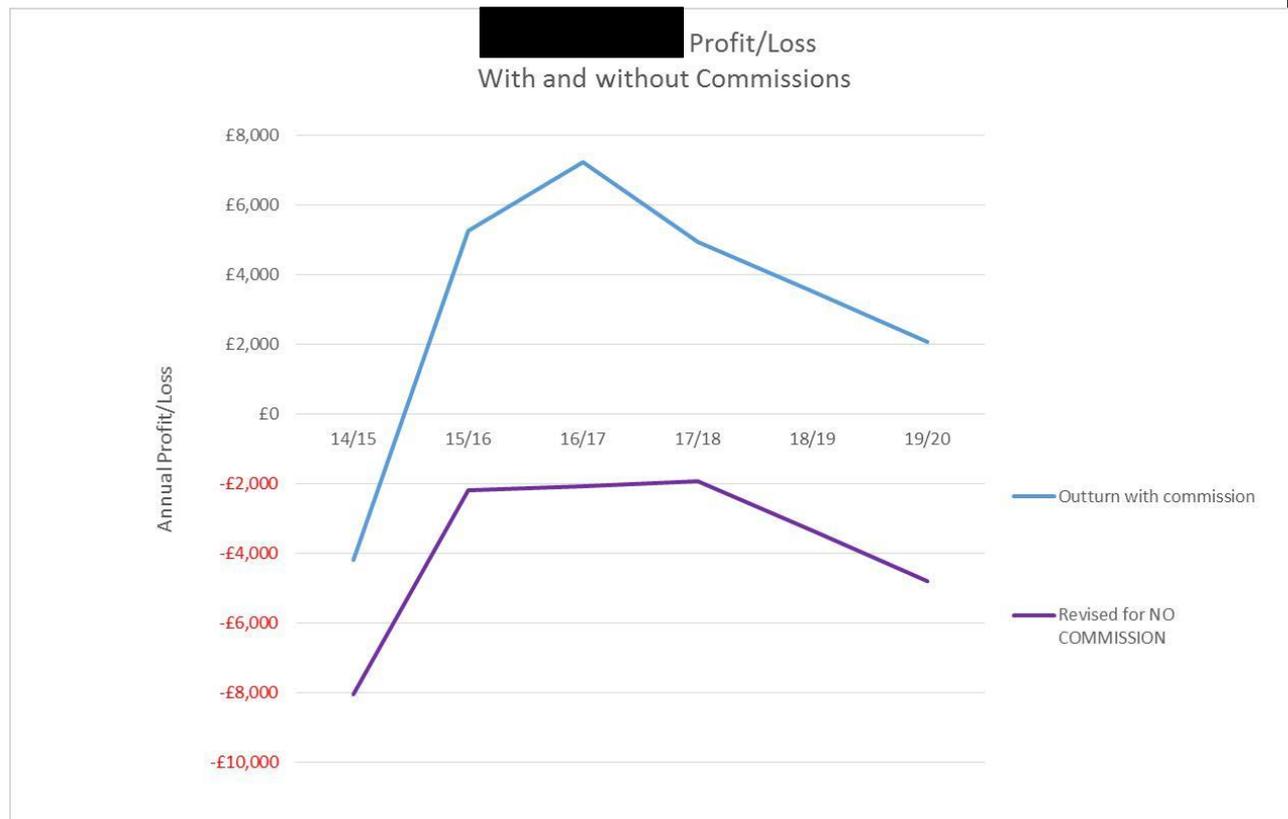
6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

We have produced a 3-year budget, which due to capped income and rising costs shows a slowly declining planned surplus. This budget includes commission income as an average value of the last three years (as detailed in Question 4). The following table shows the impact over the next 3 years with the current commission arrangements (planned surplus) and also the impact should commission be abolished (revised surplus/deficit):

[Redacted Table]

This demonstrates that abolishing the current commission rate would adversely affect the viability of our site, and would lead to us questioning whether we could continue as a business when our income does not cover our expenses.

This is very obvious when viewed graphically, combining 3 years actual outturn (14/15 to 16/17) with 3 years budgeted surplus (17/18 to 19/20):



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Continuing from the points made in question 6, the only way we could operate without our accounts showing a deficit would be to cut back on works around the park.

Essentially this would be the value-added bits we do which are non-contractual between us and our residents, but which keep the site looking neat, create and nice living environment. Such things as (but not exclusively) grass-cutting, painting, repairing fences, pot-holes, small odd-jobs for residents, continual improvements to facilities, replacement/refreshing things such as the communal noticeboard, park signage, bins and recycling facilities, less visits to the site by ourselves, changed banking arrangements

I think it is also important to recognise that it is these value-added services which also enhance the selling price for the resident when the time comes for them to market their home.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

In my response to question 7 I detailed some of the services we provide which I feel have a strong positive affect on the price achieved when a resident sells their home. It is also my opinion that when a potential buyer visits the site, they are more likely to make an offer on a home when they can see a well-kept, tidy, loved site.

Should we have to withdraw the value-added services we currently pride ourselves on delivering, the market value of the home would diminish, and potential buyers would be less likely to make an offer for a property on an unkempt site – that is not an environment I would like to live in, and I wouldn't expect anyone else to, either!

The payment of commission has a positive effect of a resident's ability to sell their home, due to the reinvestment of this commissions by ourselves in the upkeep of the site, which maximises their potential market value, and encourages buyers to make an offer on their property.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

I would prefer not to guess at a value, as I have no evidence to support. We have not been in the position where any property has sold from the Park to be sited elsewhere, and have not bought in pre-owned property to site on our Park.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

This Park is a business, and the small number of commissions we receive keep this business afloat, and allow us to maintain the site and the environment we have created. Reduction or abolition of these small gains would put us in a permanent deficit position, and we would have to take some immediate action to address the issue. This list is not exhaustive, but gives an idea of the thought processes we have to minimise our losses:

- a. Stop non-contractual activities which enhance the experience for the residents, non-essential maintenance (grass cutting, painting, repairs). The consequence of this would be a fast decline in the overall living experience of our residents, a decline in the popularity of the Park, impact on local residents enjoyment of their homes in the vicinity, a negative impact of the value of the residents' asset and resale value, and should any resident wish to market their home potential buyers would not be so willing to make an offer.**
- b. Less visits from owners/managers – [REDACTED]**
[REDACTED]
[REDACTED] If we have to limit our visits, our visibility to the residents will decline, causing distress to many of the residents who have built up a relationship of trust with us and rely on our advice and guidance on some issues, such as maintenance of their property, and we will have much less impact on early resolution of issues such as fencing, pot-holes in the road, street-light bulbs, etc.
- c. Need additional source of income – we would need to investigate ways to replace this lost income. The most obvious would be an increase in pitch fees, should this be permitted with a change in legislation.**
- d. Sell the business should the business forecasts continue to be deficit positions.**
- e. Give notice to tenants – other uses for the land, seek planning permission to build?, grazing?**

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

Yes, we would be happy to share information about our accounts, and discuss the issue further with the Welsh Government. We would insist on confidentiality, and should these reports be published or made public we would need to ensure all identifying comments are redacted, including Park name, names and addresses of our residents from their letters of support, and anything else from which could identify us or our residents.

Initial contact should be made by telephone or email, and we would welcome the opportunity to discuss face-to-face.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

The introduction of the Mobile Homes (Wales) Act 2013 has had a major impact of the sector. From our own experience this is some of the impact we have experienced, but again this list is not exhaustive:

- f. Vast increase in behind the scenes paperwork, which is out of proportion to any perceived benefit. The most obvious example of this is the amount of paperwork and forms which need completing and personalised for every resident when the pitch fee increases. [REDACTED]
[REDACTED] before you even consider the staff cost to generate and compile all these notifications and review forms!
- g. Increased office costs, staff time and administration costs (paper, printers, postage) – see above.
- h. Continual sense of “what if I get this wrong?”, with respect to paperwork, “Is someone going to take me to a tribunal?”
- i. Frustration of residents, they don’t want the continual streams of paperwork and forms. They don’t understand them all, and as they are now elderly they don’t want the responsibility of having to understand all this bureaucracy.
- j. Added complexity to something which was working just fine.
- k. Differences between the England and Wales legislation. Small differences, but very frustrating. For example (1) pitch fee increase use RPI in England and CPI in Wales. This causes inequality amongst parks as we have [REDACTED] in each country. Pitch fees are increasing faster in England, which, should we wish to sell the makes [REDACTED] English park a better financial proposition to a buyer than one in Wales. Essentially the Wales Act is having a negative impact on the value of Parks in Wales compared to comparative parks in England (2) As the majority of our costs rise in line with RPI due to most of our suppliers being liable to loans/mortgages etc, our costs are going up proportionally faster than our income. (3) Allowable expenses to reclaim with the pitch fee differ between England and Wales. In England we can recover the cost of the site licence, but not in Wales.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

██████████ I don't imagine the change in commission rate would have any effect on the Welsh language. I'm not aware that Welsh is widely spoken in the area, if at all.
However, I would support our residents becoming more immersed in the Welsh heritage, history and language should there be any initiative from the Welsh Assembly in the area. I would encourage our residents to engage in this activity and integrate with the local community.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Sorry, no suggestions for you here.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

We have [REDACTED] support from our residents, expressing their support for all we do on the Park, and their wish to live out their days with us. Many have expressed the opinion that they knew the rules regarding commissions, were aware what they were signing up for, and support the continuation of commission. [REDACTED]

**Consultation
Response Form**

Your name:

Organisation (if applicable):

email / telephone number:

Your address:

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

'C'

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

'B'

Agreement of not fixed in writing. When agreed firm % or figures. i.e on death willed to relative/partner should not benefit park owner.

Not invested into site, pure profit also cost of new homes rising, larger commission.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

None

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

At this site not often.

As a home owner no written plans or visual results.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Pure profit?

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

Evidence between site owner and home seller secret not published. Site owner buys cheap sells big.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Could have a plan where residents could move to another site on exchange basis.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

No Affect

If resident unable to sell private, site owner will make an offer of approx. 40% of what buyer paid. (verbal info)

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

None

Pitch is kept in good condition by resident (i.e. garden).

Most plots are improved by residents at their own cost, yet they are paying site owner for the privilege.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

No firm written plans as to where commission goes. (50/50 owner/plot)

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

(Not park owner)

However not sharing info could lead to profiteering.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

None

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Homes in Wales.

Part of commission to go to Welsh language schools at present no clue as to where commission goes.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

People born English will always favour 1st language. Their choice to learn Welsh.

Welsh born will speak English greater opportunities in English speaking world.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number [REDACTED]

Your address [REDACTED]

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- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

'C'

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

'C'

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Residents are not informed of how much is contributed to the overall site business.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

In ■ years of living on this site, only 3 units have been re-sold.

We are not aware of the income for these commissions being incorporated into any business plan, whether on site or off.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Residents are not made of how the commission income is used. This site has not received any extra benefits relating to sold units.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

A change, being abolishment of commission would mean residents would have a better opportunity of selling their property without worry of losing an extra 10% of the value. Long term this would encourage more sales of these type of properties and create more of a community within the sites.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

We have no evidence to support our views but can confirm that the site we live on is maintained to the very basic of standards, sometimes having to contact the owner to have work completed. Any general maintenance of the grounds re grass cutting is covered by our ground rent, however the owners are responsible for their own plots.

Long term viability of the site would be maintained by a regular rental income of the plots plus the fees that may be incurred when siting unit.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

All new buyers are expected to pay the landowners 10% of the sale value. This would have no impact to the buyers as it is irrelevant to them where their money goes once completion is done. The impact is more on the seller who loses the 10% value from the sale price agreed.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Every park home has to have a pitch. Dependant on its location it does not improve its value. However some new residents do have to pay for their pitched to be made suitable for the new units.

Buyers would only pay for their unit prior to siting it based on its own specifications but extra cost would be incurred as above for clearing pitches or building garages. This does not add value to homes.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

Consequences for home owners would mean better chances to sell, with less depreciation costs that are inevitable due to current markets.

For park owners the consequences are minimum as they would have more chances of selling units & plots to potential home owners.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

I am not a park owner, but as a resident it would be nice to be informed of the sites overall business income at an AGM, giving us details of where our land rent is being spent annually.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

I am not aware of any impact whether good or bad on the sector.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

There would be no effect on the Welsh language.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

This would have no impact on English or Welsh language speakers.

This area is English spoken primarily but all signage is also in Welsh as per Assembly Guidelines.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number [REDACTED]

Your address: [REDACTED]

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- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

'C'

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

B, C or D

Do not see any way in which commission on resale of homes benefits the site, only the owner.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

As a resident we are not informed.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Probably on death of resident and/or sale of home.

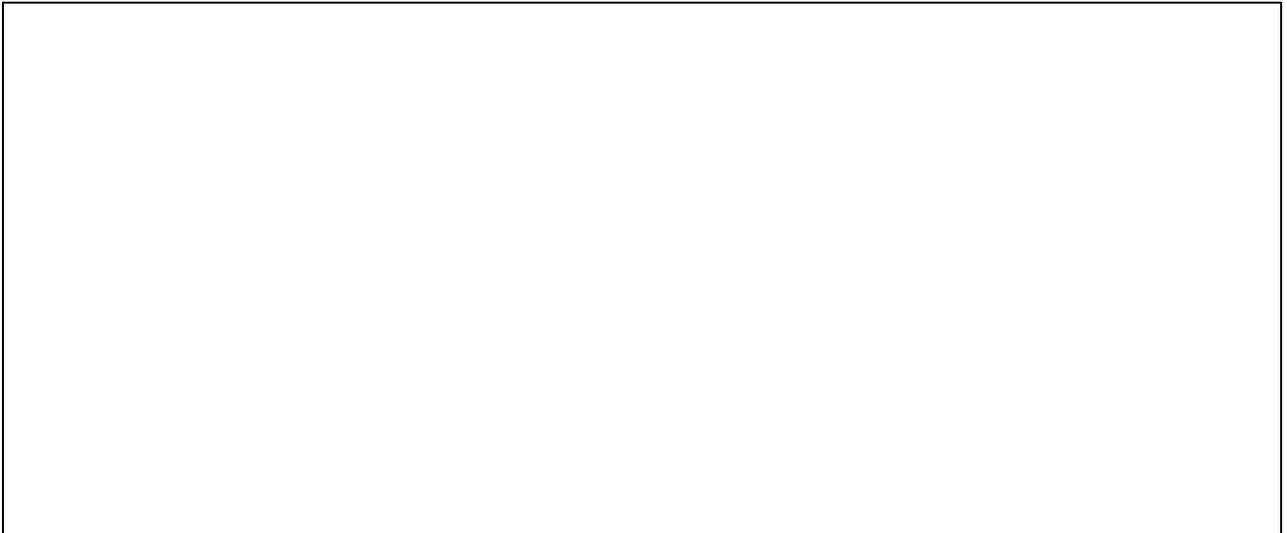
5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Don't know, not informed.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Park homes currently seem to be difficult to sell. The pitch fee as well as council tax is an increase in expenditure for retired people & the 10% commission is seen as a further loss on value of property.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

It doesn't as it is already in site. Value rises very little, is low compared with other owner occupied properties not on sites.

These properties provide a means for retirees to down size & release their properties for families BUT park homes usually ran down & new owners have to update/improve them.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Has resulted in minimum of 'street' lighting, fire hydrants, site rules, conditions of sales.

It does set down conditions & rights for benefit of residents & site owners.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Welsh people do not buy properties on this site. Changes to commission rates would encourage them to buy them.

Retired people have to live on pensions & need other monies to pay for their 'living' in old age e.g. Care workers, gardeners etc.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Residents [REDACTED] use both languages. Purchase of these properties depends on people's income. Paying council tax & a pitch fee is more expensive than living in a freehold property. Pensioner's incomes in the future will not be in keeping with cost of living.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Park homes need to be looked at as a means of sustainable living for older people. We are an ageing population, people are living longer but have declining health & no foreseen security of pensions & savings. Currently we can not depend on any income from saving, interest rates are low.

Therefore we should not lose money to commission rates. We need to encourage the purchase of these properties, commission rates benefit the site owners only but there is no benefit to residents.

These properties are also difficult to sell because a mortgage is unobtainable require cash buyers – not easy in current economic climate. We need something to encourage buyers – added expenditure is not the answer.

Consultation Response Form

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]
01248 490984

Your address: [REDACTED]
[REDACTED]

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Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner**
- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

'C' Park Home - Resident

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

'C' Be Abolished.

Site fees are increase annually with no apparent increase in services provided by the site owner.

It is noted that since the Mobile Homes (Wales) Act 2013 – home owners can sell their property independently of the site owner, hence they should not be able to claim 10% commission to “Assist” residents seeking a private sale.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Unknown. Without documentary evidence from the site owner's accounts it is impossible to predict.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Again – Unknown, as in Question 3

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Based on the answers given to question 3 & 4, it is not possible not practical to estimate the park owners additional increase.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

In my humble opinion 'NONE'

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Apart from keeping roads, paths and grass verges clear together with the maintenance of street lighting, the overall general and specific appearance of the site rests with individual home owners.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

At present it is a “fair accompli” situation, normally potential purchasers will be unaware, or oblivious, to the existence of the 10% surcharge, only to become evident when they try to sell.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

I would estimate approx. 40-50% since the “total loss” insurance value of an individual home is approximately 50% of the gross value.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

The abolition of the 10% commission, together with the Mobile Homes (Wales) Act 2013 makes park home living in Wales a much better proposition than is currently offered in sites in England and hence should attract more potential park home owners in Wales.

11. If you are a park owner, would you be prepared to share detailed information on your park’s accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Pitch fees cannot be increased by more than the C.P.I inflation index.

The local authority site license cannot be included in the site fees. Sale of home can be independent of site owner.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No noticeable effect anticipated.

14: Please also explain how you believe the proposed policy could be formulated

or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Park home living is a very community orientated lifestyle, local authority educational courses, together with local organisations, library, history, choirs etc. may well contribute to Welsh and English participation for residents to choose from.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I am so pleased our concerns relating to the unfair 10% commission charge by suite owners when selling our homes are being addressed.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number [REDACTED]

Your address: [REDACTED]

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- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

'C' Park Home – Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

'C' Be Abolished.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

Only the site owners have this information.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

As above (Q3)

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

Impossible to give any answers.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

None

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

Other than maintenance the remainder of the upkeep falls on park home owner.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

Only when you sell you are aware of the 10% surcharge.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Approx 50% of gross value.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

If abolished 10% commission it would encourage friends & family to buy home on the parks.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

Pitch fees refer to CPI index site fees cannot be included selling your home.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Can not see any problems either way.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

As above (13)

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

Nice To know that somebody is looking out for us.

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number: [REDACTED]

Your address: [REDACTED]

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- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

'C' Park Home – Resident (Owner)

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

'C' Be Abolished.

We pay ground rent and should not have to pay any more when we sell.

We pay commission when we buy our park home to park home site owner.

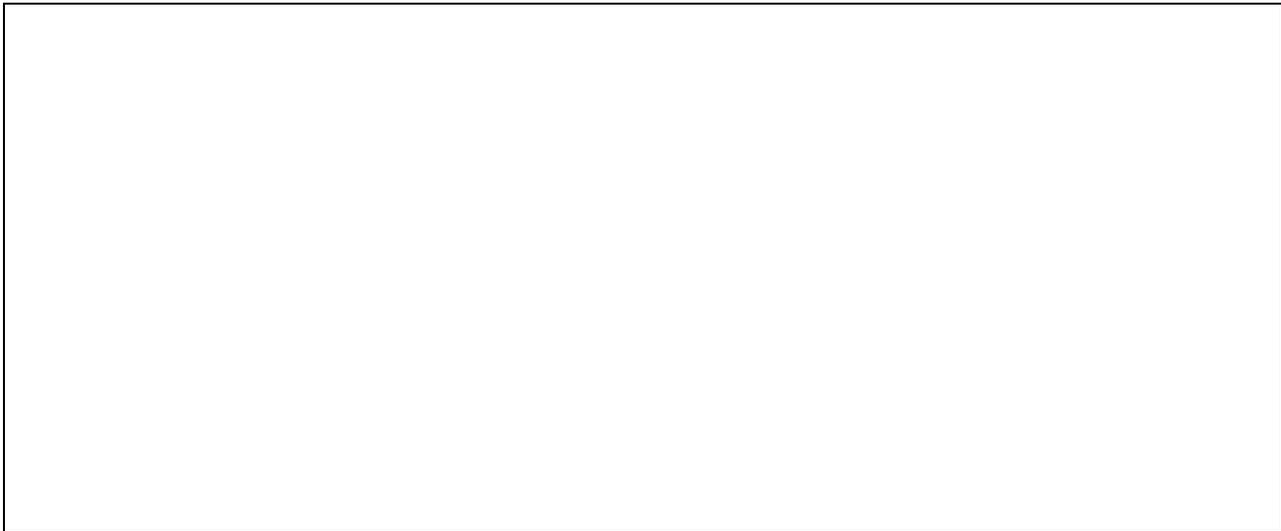
Why should we pay 10% more to the site owner.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.



7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.



8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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**Consultation
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Your name: [REDACTED]

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- b. A representative body for park owners**
- c. A park home resident (owner)**
- d. A park home resident (tenant)**
- e. A representative body for park home residents**
- f. Other, please state**

Answer:

'C' I am a park home resident

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level**
- b. Be reduced**
- c. Be abolished**
- d. Other, (please specify in box below)**

Please provide your answer choice and explain the reason for your answer

I can not ask you enough to abolish this unfair commission, it is a milestone around out neck from a bygone era, the value of our property deprecates a lot quicker then mortar & brick.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We have (the residents) have no knowledge, it would be very unlikely that the owners would give us this information.

Again it is highly unlikely that the owners would give the residents this information we have asked before and met with refusal.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Again this information is just not forthcoming from the owners – perhaps your dept would have more success obtaining this information.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

As above. Information not given out to residents

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

My park is cheek to joul with caravans probably overcrowded; they are making a handsome profit.

They the owners will not give us any written evidence.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

You have to ask the owners of the [REDACTED].

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

When a person leaves the [REDACTED] he needs every penny to acquire a new property. As far as I know you have to pay the penalty of this unfair commission to the owner.

All I know is I receive ground rent from [REDACTED] Council but I still have to top it up by about [REDACTED] a fortnight it's a lot of money to give out.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

In my experience none at all if you sell to the owner, he will give you the bare minimum, and then when you leave if they think its worth it they will improve the caravan and sell a inflated price.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

In my opinion I have to quite a few residents, and I have lived here for [REDACTED] years, that the commission fee should be scrapped it is out of date.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

I would be very surprised if the owners gave you information voluntarily. If people ask they come up against a wall of silence believe me.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

It has been a great help, because it has set out rules & guidelines which was badly needed. We can refer to the act when we need to.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

In my opinion it would encourage Welsh people to live on the village.

I think it would be best to organize a forum to discuss this question.

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects

on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

As above

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

I would like the Welsh council to inspect park homes and sites regularly and enforce the rules strictly. Such as overcrowding and illegal alterations thank you.
Please abolish the commission

**Consultation
Response Form**

Your name: [redacted]

Organisation (if applicable):

email / telephone number: [redacted]

Your address: [redacted]
[redacted]

[redacted]

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- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

'C' I am a park home resident and have owned my home for 11 years.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

It should be abolished. Park site owners make enough income by charging pitch fees and the increase in value of their parks.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

I think it depends on how many homes are sold. On this site [REDACTED] homes have been sold since the owner bought it in [REDACTED] surely the site fees are enough to give a good income without commission on sales.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Again it depends as most people on the sites are retired so tend not to move unless they are forced by their circumstances e.g. ill health, etc.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

I cannot answer that question but from my own experience no improvements have been made or money spent on the park itself.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

People would find the Park Homes a lot more attractive to buy if the 10% has to be abolished. More people would purchase them as a retirement investment.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

N/A

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

People are put off by the 10% commission, as they have already paid for their home and this devalues it.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Around 50% - don't think a park home would sell unless it was situated on a pitch by an owner selling their home. The site owner is guaranteed the pitch fees.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

If the commission was abolished, park homes would be more desirable and attract more people to come and live in Wales.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

N/A

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

By site owners having to be 'a fit and proper person to get a site license it protects us from rogue owners. It also ensures that the pitch fees are only increased by CPI inflation index once a year.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N/A

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Organisation (if applicable):

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- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

Park owner my business [REDACTED] is just about ticking over. I have owned the park [REDACTED] years now and still owe [REDACTED] on finance at [REDACTED] per month.

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

Be retained at current 10% level, without this commission the park would be losing money each year.

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

We have received approx. [REDACTED] pitch fess over the last [REDACTED] years and have received [REDACTED] commissions totalling [REDACTED] so works out at approx.. just under 10%. Copy's of assignments enclosed. The Welsh Government can have access to my accounts on a confidential basis [REDACTED]

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

[REDACTED]

I purchased the park at a cost of [REDACTED] & fees the park was in a very good state of repair. Approx. [REDACTED] years later the park will shortly need money spent to retain a good standard.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

[REDACTED]

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

As per answer 3.

The business is in [REDACTED]

[REDACTED]

To loose approx. 10% of Rental income/ commission would make this park not viable.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

I purchased the park for [REDACTED] years ago. I still owe [REDACTED] to the bank I purchased the park with the view of replacing all old homes with new ones but this has not happened [REDACTED]
[REDACTED] I would keep the park if the commission stay 10%

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

The commission is a deferred payment, payable only when the home is resold by the home owner or by the estate of the homeowner.

Without the commission the purchase price of the homes should have been higher and so would have been the pitch fees.

It would be very unfair to take away the commissions after the home owner has paid a lower price for the home and deferred the payment for a future time.

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

All park homes has a glasses guide resale price. Trade price is what you would probably get for homes sold off site

[REDACTED]

Now we are out of the recession all homes that are sited on [REDACTED] should rise in value most years but the trade book price will go down as the home gets older. The trade price will keep going down until the home is worth next to nothing but the sited price is always worth way more than the trade unsited price is. The pitch can increase in value of a mobile home by over 13 times its trade off site value and even up to and over 20 times the value can be added to the value of a mobile home if is sited on a pitch. All of the mobile homes were sited on the park before I purchased it.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

I believe a change in the commission on the resale of park homes would cause a large number of park owners to sell their parks. I believe the only purchaser for parks would be unscrupulous ones.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

I am happy to share access to my accounts on [REDACTED] with the Welsh Government [REDACTED]

[REDACTED]

[REDACTED]

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

CPI vs RPI on pitch fee reviews 8 page review form & notice extra paperwork etc has added time and expense to the running of the park.

13: We would like to know your views on the effects that the proposed changes to the park homes commission rate would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Don't know as [REDACTED].

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15: If you have any related issues which we have not specifically addressed, please use this space to report them:

**Consultation
Response Form**

Your name: [REDACTED]

Organisation (if applicable):

email / telephone number [REDACTED],
[REDACTED]

Your address: [REDACTED]
[REDACTED]

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

[REDACTED]

[REDACTED]

Answer to number 9

[REDACTED] so the pitch added £64,475 to this home at least.

[REDACTED] so the pitch added £18600 to this home.

[REDACTED] so the pitch added £81,425 to this home.

[REDACTED] so the pitch added £2400 to this home.

Now we are out of the recession all homes that are sited on [REDACTED] should rise in value most years but the Trade book price will go down as the home gets older. The trade price will keep going down until the home is worth next to nothing but the sited price is always worth way more than the trade unsited price is.

The pitch can increase the value of a mobile home by 13 times its trade off site value can be added to the value of a mobile home if is sited on a pitch.

All of the above mobile homes was sited on the park before I purchased [REDACTED].

Consultation questions:

If you require extra space for any of your replies, please use a separate sheet of paper, and identify which question your reply relates to.

1. Are you:

- a. A park owner
- b. A representative body for park owners
- c. A park home resident (owner)
- d. A park home resident (tenant)
- e. A representative body for park home residents
- f. Other, please state

Answer:

C a park home resident

2. Should commission on the re-sale of park homes in Wales:

- a. Be retained at the current 10% level
- b. Be reduced
- c. Be abolished
- d. Other, (please specify in box below)

Please provide your answer choice and explain the reason for your answer

C be abolished or reduced slightly as we get older we would maybe sell our houses to go to another suitable accommodation eg nursing homes etc and as we pay council tax and ground rent that 10% is a BIG worry for us O.A.Ps

3. How much does the income received from the commission contribute to the overall income of a site business? Please provide any evidence you have to support your answer.

No evidence of the commission has been contributed to the park. We pay ground rent every month, is this supposed to be used to maintain the site? If so please look at the photographs I've enclosed. Since I bought my house, I fell in love with it, however the site has gone from bad to worst, I'm embarrassed to have visitors now and have to apologise for the state of the park.

4. On average, how often is commission income received by a park owner? i.e. how often are pre-owned park homes sold? How is the income incorporated into the business plan? Please provide any evidence you have to support this

Approximately ■■■ a year however as the site is in a state of disarray and in need of maintenance there are currently ■■■ properties for sale with no sign of a sale nor as far as I know we have never been promised with a business plan.

5. How is the commission income received by a park owner used? Please give examples and provide supporting evidence where available.

We can only assume that the income received by the owner is used to pay his wages. We have never been furnished with any accounts nor provided with any scope of agreement from the park owner.

6. How might any change to the payment of commission impact on the viability of park home sites in the short term and/or the long term? Please provide any evidence, supporting documentation you have to support your comments.

We can only suggest that the impact or viability of park home sites would not alter as we have no evidence of where the money is spent.

7. How might a park owner seek to mitigate the impact of those risks to the short or long term viability of their site? Please provide any evidence you may have to support your view.

8. How does the payment of commission by a new occupier affect a resident's ability to sell the mobile/park home? Please provide any evidence you may have to support your view.

He must have a negative impact on the ability to sell the park home due to the evidential low turn around of properties and lack of enthusiasm the park in good repair, he comes [REDACTED] on average just to [REDACTED], and in less than half an hour he's off home to his beautiful [REDACTED]

9. How much value to a park home does being situated on a pitch add? Please provide any evidence you have to support your view.

Clearly if the park is kept in good repair more vendors would be interested in being part of the community, the value of which would be evidential in the sales and purchases of the properties.
The park in general has gone downhill since I came to live her [REDACTED] years ago.

10. The Welsh Government wishes to understand all consequences of the potential reduction or abolition of the commission. Please explain all consequences in your view and provide any evidence you have to support your view.

11. If you are a park owner, would you be prepared to share detailed information on your park's accounts with the Welsh Government?

If so, please provide the preferred method to contact you to discuss any such arrangements.

12. What impact has the introduction of the Mobile Homes (Wales) Act 2013 had on the sector so far? Please provide any evidence to support your view.

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None but I do speak Welsh

14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh

language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Don't know

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