



Date: 29th July 2020

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Thank you for your email of 17 July 2020. I note that you have been contacted by a number of Holiday Caravan owners at Overstone Lakes ("the Park") asking whether they might be permitted to remain in occupation of their Holiday Caravans on the Park during the period between 15 January and 14 March 2021, when the Park is scheduled to be closed, due to concerns over a possible further wave of coronavirus.

We have considered this request, but regret that we will not be able to allow any Holiday Caravan owners to remain on the Park during the closed period for the following reasons:

1. The Park is licensed for use as a Holiday Caravan site, and not as a permanent residential site. We have always required owners to vacate the Park during the annual closed period and our owners are well aware of this requirement, which is an express term of their licence agreements with us. We are concerned that if we were to permit anyone to continue to occupy their Holiday Caravans on the Park during the closed season this could send a message to owners that this restriction was being relaxed, and would potentially lead to problems in future years;
2. The conditions of our site licence with Borough Council of Wellingborough specifically state that Holiday Caravans may not be used on the Park between 15 January and 14 March each year ("the closed season"), and so we would be in breach of our licence conditions were we to permit anyone to occupy their Holiday Caravans on the Park between those dates. While we are aware that the statement made on 14 July 2020 by the Communities Secretary recommended that local authorities should be slow to enforce licence breaches against Holiday Caravan park operators who wished to extend their open seasons, that does not of course impose any requirement on a park operator to extend their open season where they do not wish to do so;
3. We are surprised at your comment that "residents are saying they are struggling to find accommodation for this period". As the Park is operated as a Holiday park, we make it very clear to all owners in their licence agreement (a) that they may not use their Holiday Caravans on the park as their only or main residence, and (b) that the Park will be closed each year during the closed season. In addition, all owners must provide us with evidence of their main address when they purchase their Holiday Caravan or when that address changes. This is to ensure that we do not inadvertently breach the terms of our site licence by permitting residential occupation on the Park. Should further restrictions be necessary in the event of a further wave of Covid-19 we would expect owners to return to their main place of residence and not to use their Holiday Caravans on the Park, in line with the guidance given by Government in March 2020 when holiday parks were required to close;

4. In addition, it would cause us substantial operations difficulties if we were to open the Park for the 2021 closed season. The closed season has historically been the time when the staff at all of our holiday parks can take annual leave. The 2021 closed season will be even more important, as many of our staff had their leave this year cancelled both through lockdown and subsequently during reopening, as we needed our staff available to keep our parks maintained and to prepare for reopening. Many staff members have already booked holidays during the 2021 closed season. The staff that are due to remain working on Park through the closed season already have a full agenda and it would be unduly burdensome for them and us if they also had to manage owners' needs during this period;
5. The closed season is also historically when we carry out much of our major maintenance work on the Park. For example, the main sewer pump stations are fully drained and the tanks cleaned and sanitised by specialists, and the sewer pumps are removed and serviced. This involves blocking the incoming sewer lines, and is impossible to do when the Park's sewers are in use by owners;
6. Our electrical contractors are also due to carry out upgrade works on the cable and distribution units during the coming closed season, which will involve shutting down the power in large areas of the Park. It would inevitably cause disruption to owners if this work had to be done while the Park was still open; and
7. We have to carry out significant tree surgery works to some extremely large trees on the Park that, for health and safety reasons, can only be carried out while the adjacent Holiday Caravans are vacant. These works have also been booked for the 2021 closed season.
8. Finally, the Park is operated by Allens Caravans (Estates) Ltd under a lease from a third party family Trust. This lease is restrictive to operating as a Holiday park as well as within the bounds of the planning permissions and site licences that are granted, so we would also be in breach of this lease if we were to remain open.

For the above reasons, we are not intending to keep the Park open during the 2021 closed season.

Yours sincerely,



Joe Folkes
Director