

Equality Impact Assessment (EIA) 2020

Set Fees and Charges for Park Homes Sites following the introduction of the Mobile Homes Act 2013

Section 1 – Details of the service, service change, decommissioning of the service, strategy, function or procedure

Assessment Lead Officer, Email, Telephone Number	Michael Cronley Michael.cronley@warrington.gov.uk 07971234687
Directorate and Department	Environment and Transport Directorate
Date of Assessment	13/4/22
Details of the service, service change, decommissioning of the service, strategy, function or procedure.	Introduction of fees & charges for Park homes sites licensing regime.
Who is Affected?	Park site owners, residents of mobile homes including Gypsy Roma & Traveller sites
Links and impact on other services, strategies, functions or procedures.	None

Section 2 - Relevance Assessment – Do I need to complete a full EIA?

Is a Full EIA required? Yes/No	
Yes	Please go to section 3
No	<i>Park Homes are often in Rural Locations, issues raised with the team include inadequate road drainage, lighting, electrical safety and adequacy. An annual inspection regime should improve standards for residents.</i> <i>Many site occupants are elderly and have low incomes. An inspection regime and charging for non-compliance interventions</i>

should drive up standards on sites. Costs to individual Park home owners have been minimised with the best value ethos applied. Care has been taken in setting the fees to keep the impact on individual households low. The two sites of one unit have been made exempt. And a discount has been applied to sites with 5 units or less. This makes the maximum cost for a resident on this site £33 per annum or £0.64p per week.

Human rights have been at the heart of the proposed changes in legislation to improve standards for Park Home occupants. The change is intended to improve Health and well-being of Park Home Occupants by increasing accountability on Site Owners to provide well managed and safe sites.

Inspection of sites will mean that the state of roadways will be checked on an annual basis supporting access for disabled groups. Many elderly / vulnerable groups live in Park Homes. With discounts in place based on number of units per site the costs are kept low at an average of £21.02 per annum for residents. Again an inspection regime and charging for non-compliance interventions should drive up standards on sites. Costs to individual Park home owners have been minimised within the cost recovery, best value ethos being applied.

Some Park Homes Sites are both owned or occupied by the Gypsy Roma & Traveller community. The proposed charging regime will benefit occupants and owners in ensuring standards are maintained and sites are therefore more desirable to occupants. A discount has been applied to sites having 5 or less units to limit the cost per occupant to a maximum of £33 with an average of £19.21 per year. Costs to individual Park home owners have been minimised within the best value ethos. A review of sites highlighted that some Gypsy Roma and Traveller owned sites which are occupied by less than 5 homes (5 out of 8 sites) could be disproportionately affected by the change. For this reason one Gypsy Roma and traveller site has been excluded from the scheme. Additionally a discount has been applied to sites having 5 or less units to limit the cost per occupant to a maximum of £33 per year. Costs to individual Park home owners have been minimised within the cost recovery policy of the Council.

Assessment Lead Officer: Michael Cronley Senior Private Sector Housing Officer (Caravan Licensing)

Date: 13.04.2022

Head of Service
Protection and Prevention Manager

Dave Watson Public
Date: 19.04.22

FULL EQUALITY IMPACT ASSESSMENT

Section 3 - Information – What do you know?

What information (qualitative and quantitative) and/or research have you used to commission/change/decommission this service, strategy, function or procedure?	
Information Used	<p><i>The Council is authorised and has a duty to license Caravan Sites under the Caravan Sites and Control of Development Act 1960. The government has introduced the Mobile Homes Act 2013 in response to unfair trading practices on some sites to enable Local Authorities to charge for inspection of Protected Sites. This EIA relates to the Council's charging scheme for protected sites details contained in the attached proposed fees policy</i></p> <p><i>Stakeholders: Site Owners, Site occupants of protected sites, fire service.</i></p> <p><i>Fees and charges for caravan site licensing have been introduced by the vast majority of Councils since its introduction in 2013.</i></p> <p><i>Park Homes play a valuable but generally unrecognised role in the wider housing market. There are nearly quarter of a million people living in some 100,000 Park Homes on approximately 2,000 licensed Park Home Estates in the UK. Approximately 2,000 Park Homes are manufactured each year according to National Caravan Council statistics; mostly for replacement purposes rather than as additions to the overall stock. Park Home Estates offer a secure, community-focused, environment that satisfies the needs of an increasingly large proportion of the UK population. In particular the semi-retired, retired and elderly, mobile home sites park rules generally have an age restriction on occupation of the site (55 years of age minimum). There are currently 68 residential pitches in Warrington over 7 sites. There will be a discount or no fee applied to 4 of these sites, the total cost of this discount amounts to £644.</i></p> <p><i>There are currently 52 Gypsy Roma & Traveller pitches in Warrington over 8 sites, there will be a discount or no fee applied to 5 of these sites. The total cost of this discount amounts to £530.</i></p>

Gaps in Information	N/A

4. What did people tell you?

What consultation and engagement activities have you undertaken and what did people tell you? Is there any feedback from other local and/or external regional/national consultations that could be included in your assessment?	
Details and date of the consultation and/or engagement activity	<p><i>There is no requirement under the legislation to consult, only the need for it to be adopted by the Council and a fees policy published prior to its introduction, however a 6 week consultation was run online with hard copies available on request between 21 February and 4 April 2022. The site owners and residents of the affected sites were written to and advised of the consultation. In total 112 received correspondence advising of the proposed fees and structure and inviting them to take part in the consultation. A total of 5 replies were received giving a response rate of 4.46% with the following results for each licence fee function;</i></p> <ul style="list-style-type: none"> • <i>Transfer of site licence – 40% strongly agree/agree (SA/A), 40% Neither agree or disagree (NAD), 20% Disagree (D)</i> • <i>Grant Licence – 80% SA/A, 20% D</i> • <i>Deposit of site rules – 50% SA/A, 25% NAD, 25% D</i> • <i>Fit & Proper Person – 75% SA/A, 25% D</i> • <i>Compliance notice – 100% SA/A</i> • <i>Variation of Licence – 75% SA/A, 25% NAD</i> • <i>Annual Fee – 40% Agree (A), 60% Disagree/strongly disagree (DSD)</i> • <i>Discount applied – 60% A, 40% NAD</i> • <i>Dispensation – 80% A, 20% NAD</i>
Gaps in consultation and engagement feedback	All affected residents and site owners were contacted and invited to complete the consultation.

5. Monitoring and Review -

How will the impact of the service, service change, decommissioning of the service, strategy, function or procedure be monitored? How will actions to mitigate negative impacts be monitored? Date for review of the EIA	
Details of monitoring activities	<i>The Act states that we must take into account any surplus and deficit when affixing the fees, the fees policy sets out that we will monitor and record the time taken each year and in year 3 average out the cost and set the fee again for next 3 years. Therefore the fees are monitored and adjusted accordingly so that they are fair and consistent.</i>
Date and responsible officer for the review of the EIA	The EIA will be reviewed in October 2022 with the responsible officer being Michael Cronley Senior Private Sector Housing Officer (Caravan Licensing), Environment and Transport Directorate.

6. Sign Off

When you have completed your EIA, it must be signed off by a senior manager within your Department (Assistant Director or above).

Name	Signature	Date
D.Watson		19.04.22

7. Help and Support

For support and advice please contact the Business Intelligence Team at equalities@warrington.gov.uk