



Central Bedfordshire Council Park Home Site Licensing Fees Policy 2014

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Service	Housing Services		
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Executive Summary

The Mobile Homes Act 2013 (MHA 2013) was introduced in order to provide greater protection to occupiers of residential caravans and mobile homes. It received royal assent on 26th March 2013 with some parts implemented on 26th May 2013. The MHA 2013 will introduce some important changes to park home site licensing on 1st April 2014 due to its amendments to Caravan Sites and Control of Development Act 1960 (the Amended Act). These changes include the ability for Local Authorities to charge site owners a fee for applying for a site licence, for amendments or transfers of existing licences, and for annual fees.

In order to be able to charge these fees the Council needs to publish them within a Fees Policy. This Central Bedfordshire Council Park Homes Fees Policy has therefore been formulated so that these fees can be incorporated within the Council's 2014/15 Fees and Charges Schedule. Publication of this Fees Policy by 1st April 2014 will enable fee recovery by the Council at the earliest possible point in time and enable Site Owners to recover these costs should they opt to increase pitch fees at the next pitch fee review date.

The fees associated with applying initially for a new site licence, for transfers/standard amendments of existing licences, site expansion amendments, and for annual fees are to be set initially as follows:

Initial Licence Fee = £53.61 per pitch

Transfer or Standard Amendment Fee = £249.88 per site/application

Site Expansion Amendment Fee = Standard Amendment Fee (£249.88) plus £8.70 per additional pitch

Annual Fee = £11.62 per pitch

Sites that are for holiday use only or are only allowed to have units stationed on them at certain times of the year are exempt from licensing fees. These are the only statutory exemptions, however, the Amended Act enables Local Authorities to fix different fees or to determine that no fee is required to be paid in certain cases or descriptions of case.

It was felt appropriate for Central Bedfordshire Council to make single pitch sites exempt from annual fees (but not other licensing fees) as these lower risk sites are less onerous to inspect and collecting annual fees from them would not be cost effective.

The MHA 2013 also introduced the ability for Local Authorities to serve enforcement notices and to carry out works in default to remedy breaches of site licence conditions from 1st April 2014. The Council would be able to

charge fees in relation to this. The fee for Housing Act 2004 enforcement notices is already set at £208.10 for 2013/14 and is likely to remain the same for 2014/15. Due to the similarity of Housing Act and park home site enforcement notices the latter will be set to mirror the former. The administration charge for works in default for park home site enforcement will be set at the same level as that for Housing Act enforcement works in default which is likely to remain at 20%.

Site Rule Regulations came into force on 4th February 2014 which set out the timescales (12 months from that date) within which site owners will need to replace existing site rules with new ones that should be deposited with the Local Authority. Local Authorities will be able to require a fee when site rules are deposited and will be required to publish an up to date register of site rules. The fee for depositing site rules with the Council will be set at £30.91.

The MHA 2013 also makes provision for regulations to be made requiring site owners to be "Fit and Proper Persons" and for Local Authorities to keep up to date a registers of fit and proper persons to manage relevant protected sites. Local Authorities would be able to charge a fee for fit and proper person register applications. The fee for such applications will be set at £105.75.

1. Introduction

The Caravan Sites and Control of Development Act 1960 (CSCDA 1960) came into force on 29th August 1960. Part one of the Act introduced a licensing system, to be operated by Local Authorities to regulate the establishment and operation of caravan sites. Section 29 of this Act defines what constitutes a caravan and caravan site, and these are commonly known as park homes and park home sites.

The first schedule of the Act sets out cases where a site licence is not required, including:

- Local Authority-owned sites
- Use incidental to a dwellinghouse within the same curtilage
- Sites where a single caravan is stationed on land for not more than two nights and not more than 28 days in any 12 month period
- Sites where caravans are stationed on land not less than five acres for not more than 28 days and no more than three caravans are stationed at any one time
- Sites where caravans are solely for seasonal agricultural/forestry workers employed on land owned by the site owner
- Sites where caravans are solely for workers employed in building or engineering operations on that or adjacent land
- Sites used by travelling showmen who are members of a relevant organisation
- Sites occupied by organisations holding a certificate of exemption

Licences can only be issued to the owners of sites that have obtained valid planning permission.

As of October 2013 the Council was administering site licenses for 82 Park Home sites with the total number of units across all sites exceeding 1200. The extent of work with each site will vary according to size, complexity, and whether there are issues arising with residents.

The Department of Communities and Local Government (DCLG) launched a consultation in April 2012 on proposed major reforms to the relevant legislation with the aim of giving greater protection to occupiers of residential caravans and mobile homes. DCLG stated in their Impact Assessment of the consultation “A Better Deal for Mobile Home Owners -Changes to the Local Authority Site Licensing Regime” (published November 2012) that the existing legislation did not allow local authorities to charge fees for issuing and monitoring site licenses, or taking enforcement action if conditions were not met. They added that in practice, this severely limited local authorities’ resources to provide effective scrutiny of the sector.

As a consequence new legislation in the form of The Mobile Homes Act 2013 (MHA 2013) was introduced. This received royal assent on 26th March 2013 with some parts implemented on 26th May 2013. The MHA 2013 will introduce some important changes to park home site licensing on 1st April 2014 due to its amendments to CSCDA 1960. These changes include the ability for Local Authorities to charge site owners a fee for applying for a site licence, for amendments or transfers of existing licences, and for annual fees. Site owners may recover the annual fees through an increase in pitch fees, however, residents will benefit as these fees will help Local Authorities to increase their activity in an area that has historically been under-resourced.

Section 10A (2) of the CSCDA 1960 as amended by the MHA 2013 (the Amended Act) requires a Local Authority to publish a Fees Policy before charging fees for the licensing of park home sites. The Central Bedfordshire Council Park Homes Fee Policy (the Fees Policy) has therefore been developed to enable the Council to begin charging these fees on 1st April 2014.

The MHA 2013 also introduced the ability for Local Authorities to serve enforcement notices and to carry out works in default to remedy breaches of site licence conditions from 1st April 2014. The associated fees and charges are therefore also included in the Fees Policy.

The MHA 2013 also introduced changes relating to site rules. Site Rule Regulations came into force on 4th February 2014 which set out the timescales (12 months from that date) within which site owners will need to replace existing site rules with new ones that should be deposited with the Local Authority. Local Authorities will be able to require a fee when site rules are deposited and will be required to publish an up to date register of site rules. The Fees Policy sets out what this fee will be.

One further aspect of the MHA 2013 where Local Authorities would be able to require a fee is upon application from a site owner to be included in the Council's register of fit and proper persons for managing relevant protected sites. The MHA 2013 makes provisions for regulations to be made requiring site owners to be "fit and proper persons" and for Local Authorities to keep such registers up to date, and therefore it is prudent to include the relevant fee within the Fees Policy.

2. Fees for Initial Licence, Transfer/Amendment, Amendments for Site Expansion, and Annual Fees

2.1 Overview

Subject to the exemptions detailed in the introduction there is a requirement for site owners to ensure that their park home sites are licensed. Failure to do so would be an offence under Section 1(2) of the CSCDA 1960 which can attract a fine not exceeding level 4 on the standard scale upon summary conviction.

Section 3 (2A) of the Amended Act enables Local Authorities to require a fee in respect to a relevant protected site application.

Section 5A (1) of the Amended Act enables Local Authorities to require an annual fee to be paid by site owners in respect of relevant protected sites.

Local Authorities may also charge a fee for alterations to licence conditions where these are requested by a site owner or where an application to transfer the licence to another person/organisation is received (Section 8 (1B) and Section 10 (1A) of the Amended Act, respectively).

When requiring a licence holder to pay an annual fee the Council must inform them of matters to which they have had regard to in fixing the fee for the year in question, in particular the extent to which they have had regard to deficits or surpluses in the accounts for the annual fee for previous years. The costs associated with dealing with valid complaints, monitoring conditions on sites, and dealing with licensing matters informally can be included within annual fees. However, annual fees should not take into account any costs incurred in relation to enforcement activities such as serving compliance notices, emergency action, and works in default as these costs can be recovered by other means. Costs relating to Local Authorities providing sites for caravans cannot be taken into account in fee determination either.

2.2. Exemptions from paying fees

Sites that are for holiday use only or are only allowed to have units stationed on them at certain times of the year are exempt from licensing fees by virtue of not falling within the definition of “Relevant Protected Sites”. These are the only statutory exemptions, however, Section 10A (3) of the Amended Act enables Local Authorities to fix different fees or to determine that no fee is required to be paid in certain cases or descriptions of case.

It was felt appropriate for Central Bedfordshire Council to make single pitch sites exempt from annual fees (but not other licensing fees) as there are less issues (e.g. spacing) to consider when carrying out routine monitoring compared with multiple pitch sites. In addition to this, collecting annual fees from single pitch sites would not be cost effective. The intention would be to monitor these sites less frequently than those attracting an annual fee due to the lower risk generally associated with single pitch sites. The costs associated with monitoring single pitch sites would be met through existing budgets.

2.3 Fees for Initial Licence, Transfer/Amendment, Amendments for Site Expansion, and Annual Fees

In addition to setting fees for the initial licence, transfer/amendment of licence, and annual fees there was a need to set an elevated level of fee for amendments to site licences relating to the expansion of sites to include additional pitches. The reason for the elevated level of fees is that these applications take significantly more time to deal with than a transfer or more straightforward amendment to a site licence, as they involve elements akin to the initial licensing of a site (e.g. site inspection).

The calculation and methodology relating to the calculation of fees is explained in detail in Appendix A. However, in summary this involved a costing exercise using templates breaking down the amount of time taken for various steps in the processes. These templates included both fixed elements and elements (e.g. inspection time) that varied with the number of pitches. The templates were reviewed by officers responsible for licensing park home sites at Central Bedfordshire Council and other Local Authorities. Amendments to the templates were made as a result of initial feedback and subsequent feedback from the DCLG Working Group which indicated that it may be better to apply the cost of re-inspections through a surplus/deficit mechanism in the annual fee for subsequent years rather than including within the base annual fee. This would ensure that residents would not be adversely affected by the cost of re-inspections resulting from poor management, as site owners would only be able to take into account the base fee when recovering the cost of annual fees through pitch fees. Details of the initial benchmarking exercise are shown in Appendix B.

The average officer hourly rate was applied to the total time taken for the processes and other costs such as printing, postage and mileage were added. These templates were then used to create formulas that could be used in the calculation of the various fees.

Annual fees were calculated by determining the total cost of providing the service for all current non-exempted sites using the appropriate formula. This was then divided by the total number of pitches on these sites.

Annual Fee = £11.62per pitch.

We cannot accurately predict what new site licence applications the Council will receive going forward. It was therefore felt appropriate to work on the basis that new applications would broadly reflect the diversity with regards pitch numbers of the current relevant protected sites. As a consequence the fee for processing a new application for a site licence was calculated by using the relevant formula to determine what the total cost would be of processing new applications for all the existing relevant protected sites and then dividing that cost by the total number of pitches on these sites.

Initial Licence Fee = £53.61 per pitch.

The fee for the transfer or standard amendment of an existing licence was calculated by using the relevant formula to determine the cost of processing such applications. As the cost is not dependant on the number of pitches a single figure per site was obtainable.

Transfer or Standard Amendment Fee = £249.88 per site.

An additional per pitch fee component was required to add to the standard amendment/transfer fee for site expansion amendments to cover the cost of inspection. This was determined using the relevant formula to determine the total cost for all existing relevant protected sites which was then then divided by the total number of pitches on these sites.

Site Expansion Amendment Fee = Standard Amendment Fee (£249.88) plus £8.70per additional pitch.

When requiring a licence holder to pay an annual fee the Council will inform them of the matters to which they have had regard to in fixing the fee for the year in question, in particular the extent to which they have had regard to deficits or surpluses in the account for the annual fee for previous years. In determining the deficits or surpluses in the account any costs relating to dealing with valid complaints, monitoring conditions on sites, and dealing with licensing matters informally, will be considered by the Council unless they are specifically excluded by the Amended Act.

For the sake of clarity, annual fees will be determined by the number of pitches that the licence permits.

2.4 Time when Fees are payable

Section 10A(5) of the Amended Act states that the Fees Policy must include provision about the time at which the annual fee is payable. For the purpose of this policy the period covered by the annual fee will mirror the financial year (1st April to 31st March) and will be paid in advance. Invoices will be sent out during the month of April requiring payment within 30 days. Where a new site is licensed part way through the year then an invoice with the same payment terms will be sent shortly after the licence is issued for the pro-rata amount.

Where a site is expanded part way through the year to include additional units the corresponding higher fee would apply from that point. In such cases an invoice with the same payment terms, covering the difference between the original and increased fee for the remainder of the financial year will be sent shortly after the amended licence has been issued.

3. Charges for Enforcement Notices and Works in Default

3.1 Overview

Section 9A of the Amended Act allows Local Authorities from 1st April 2014 to serve compliance notices on site owners where site licence conditions are breached. These notices will set out what the site owner needs to do to correct the breaches and the timescales, and the notice will attract a charge. Failure to comply with the notice would be a criminal offence, punishable by a fine at level 5 on the standard scale, and the site licence could be revoked upon a third or subsequent prosecution. Following a successful prosecution for breaching a compliance notice Local Authorities will be able to serve notice to enter the site and carry out the necessary works (Works in Default).

In addition to this, Section 9E of the Amended Act allows a notice to be served on site owners enabling the Local Authority to enter the site and take emergency action where there is an imminent risk of serious harm.

The cost of deciding whether to take action, preparing and serving the various enforcement notices and the actual work itself can be recovered by Local Authorities through charges for notices and recharging for works in default.

Unpaid charges can be placed as a charge against the site owner's land.

3.2 Charges for Enforcement Notices and Works in Default

As this is a new provision Local Authorities have little to base their charges for park home enforcement notices on. However, the processes involved are going to be very similar to those involved in the service of Housing Act 2004 enforcement notices. The level of charge for these notices was arrived at through a time and officer cost calculation and benchmarked against other Local Authorities in 2010. Since then this charge has increased annually by the same percentage as other charges in the Council's Fees and Charges Schedule and stands at £208.10 for 2013/14. This charge is likely to remain at the same level for 2014/15 and therefore the charge for park homes enforcement notices should mirror the charge for Housing Act 2004 notices at £208.10.

Similarly, the administration charge that is added to the cost of works when recovering expenses relating to works in default should mirror that set for Housing Act 2004 works in default at 20%. As the Council cannot recharge the VAT element of the cost of work in such cases setting the admin charge any lower than 20% may lead to site owners failing to comply with notices on the basis that the Council's charge would be cheaper than paying for a VAT registered contractor themselves to carry out the works.

4. Fees for Depositing Site Rules

4.1 Overview

Site rules are different to site licence conditions in that they are neither created nor enforced by Local Authorities. They are a set of rules created by the site owner which residents have to comply with. They may reflect the site licence conditions but will also cover matters unrelated to licensing. The Mobile Homes Act 2013 makes amendments to the Mobile Homes Act 1983 Act in relation to site rules. Site rule regulations came into force on 4th February 2014 which requires existing site rules to be replaced with new site rules to be deposited with the Local Authority within a specified timescale (12 months from that date).

Local Authorities will need to satisfy themselves that replacement or new rules deposited with them have been made in accordance with the statutory procedure. They will also be required to establish, keep up to date, and publish a register of site rules. In doing so a Local Authority may levy a fee for the depositing of site rules, or the variation or deletion of site rules.

4.2 Fees for depositing Site Rules

Once an administrative system is in place for holding and publishing site rules it is estimated that it will take approximately 1 hour for officers to undertake their duties in relation to the deposited site rules. It is therefore appropriate to set a fee of £30.91 (based on the appropriate hourly rate) for the depositing of site rules by site owners. The relevant calculations can be viewed in Appendix A.

5. Fees for Fit and Proper Persons Register Applications

5.1 Overview

Section 8 of the MHA 2013 relates to “Fit and Proper Persons” in respect to relevant protected sites, however, it does not come into force until the Secretary of State (SoS) issues the necessary statutory instrument.

Should this come into force then it would enable the SoS to issue regulations making it an offence for a site owner to manage a site if the Local Authority does not consider them to be a fit and proper person. It would also enable the SoS to issue regulations requiring the Local Authority to establish, publish and keep up to date a register of persons they are satisfied are fit and proper

persons to manage protected sites in their area, and enable them to charge a fee for applications for inclusion on the register.

5.2 Fees for Fit and Proper Persons Register Applications

The benchmarking exercise shown in Appendix B revealed that most of the Local Authorities that responded believed that proper fit and proper person checks would take 120 minutes. It is anticipated that updating and publishing a register would take a further 30 minutes. It is therefore appropriate to set a fee of £105.75 (based on the appropriate hourly rate) for making fit and proper person applications. The relevant calculations can be viewed in Appendix A.

6. Revising Fees

6.1 Revising Fees

The fees covered by the Park Homes Fees Policy will be increased annually by the same percentage that is applied to other fees in the Council's Fees and Charges Schedule. Should a more significant change in fees be required then the Park Homes Fee Policy will be revised and published.

Appendix A Calculation of Fees

Licensing Fees

Templates were drafted showing the steps currently undertaken for the following licensing activities in relation to Park Home Sites:

- Processing an application for a site licence culminating in the licence being issued;
- Processing an application for the amendment or transfer of an existing site licence;
- Processing an application for the amendment of an existing site licence in relation to the expansion of a site (this was developed after consulting CBC Officers and other Local Authorities);
- Ongoing monitoring of sites to ensure compliance with site licence conditions

Fixed times and per pitch times were assigned to the various steps in the templates which were then circulated within Private Sector Housing to give Officers the opportunity to comment on whether they felt the figures were representative of the time taken. The general consensus was that they were representative, although some minor amendments were made as a result of this consultation. Further views on the templates were sought from other Local Authorities via EHCNet which is a system for exchanging information between Environmental Health Departments throughout the country. Only a few responses were received from other Local Authorities (benchmarking shown in Appendix B) and these did not give cause to alter the times on the templates. They did indicate that other Local Authorities had not begun the process of determining fees yet and that many will be awaiting the outcome from the Department of Communities and Local Government Working Group on Park Home Licensing. This working group met on 20th September 2013, and one of its tasks will be to produce a toolkit to help Local Authorities set park homes licensing fees. The fee setting process at Central Bedfordshire Council requires the fee policy to be submitted for approval before the output of the working group is likely to become available. It was therefore decided that Central Bedfordshire Council would determine their fees and provide the working group with the methodology in order to assist with their work.

Whilst the output from this working group was not known at the time of drafting the policy the involvement of Central Bedfordshire Council in the working group has meant that the Fees Policy has been shaped to some degree by discussions of the group. The group indicated that it may be better to apply the cost of re-inspections through a surplus/deficit mechanism in the annual fee for subsequent years rather than including within the base annual fee. This would ensure that residents would not be adversely affected by the cost of re-inspections resulting from poor management, as site owners would only be able to take into account the base fee when recovering the cost of annual fees through pitch fees. As a consequence aspects relating to re-inspections were removed from the template and formula used to calculate annual fees.

The Adult Social Care, Health and Housing Finance Team provided hourly rates for Officers and Managers within the Private Sector Housing Team as they are responsible for Park Home Site Licensing. The average hourly rates shown in Tables A1 and A2 below were applied to the total time for the processes.

Table A1- Hourly Rate for Private Sector Housing Officers

Pay to P3 based on 100% FTE

Technical Officer	43,502.50
Technical Officer	43,384.32
Technical Officer	43,384.32
Environmental Health Officer	56,567.31
Technical Officer	41,845.24
Environmental Health Officer	56,567.31
Technical Officer	43,502.50
Environmental Health Officer	49,268.00
Technical Officer	43,502.50
Environmental Health Officer	49,268.00
Technical Officer	40,991.09
Total	511,783.07
Average	46,525.73
Support service 40%	18,610.29
No Of Staff	11
Total average staff Cost per annum	65,136.03
Productive Hours Per annum	1,540
Hourly Rate	£42.30

Table A2 - Hourly Rate for Private Sector Housing Managers**PSH Managers based on 100% FTE**

Private Sector Housing Manager (North)	60,600.00
Private Sector Housing Manager (South)	60,600.00
Total	121,200.00
Average	60,600.00
Support service 40%	24,240.00
No Of Staff	2
Total average staff Cost per annum	84,840.00
Productive Hours Per annum	1,540
Hourly Rate	£55.09

The average return mileage for all sites to which fees would be applicable and the travel time associated with this was determined from AA Routemaster and applied to the calculations, along with other costs such as printing and postage. Examples of the templates that were used for the calculations are shown below for sites with 2 pitches (or 1 pitch in the case of the site expansion fee).

Table A3 - Template for calculating the costs associated with staff time (fixed and per pitch) plus fixed costs for the Initial Licence Fee

Number of pitches (amend as required)	2
Inspection time per pitch (mins)	10
Letter time per pitch (mins)	5
Average return mileage	14.2
Average journey time (mins)	26

	Time (mins)
Enquiry received and a service request entered on the Case Management System.	30
Obtain planning documents. Record the type of development permitted, restrictions etc on the Case Management System. Print hard copies of the planning documents.	30
Make up a new caravan site/park home site file and attach the above documentation	20
Send out a site licence application form with a covering letter and enter an action on the Case Management System.	15

Contact the applicant and make an appointment to carry out an initial site inspection. Enter this action on the Case Management System.	10
Carry out an initial site inspection. Advise the applicant as necessary on the layout, spacing and other site licence conditions. Help the applicant complete the application form, if required. Enter a record of the inspection on the Case Management System. Approx inspection time for first unit.	30
Additional inspection time for all pitches over and above the first	10
Travel Time	26
Enter particulars from application form on to the premises record on the Case Management System. Scan and save the application form to the Case Management System.	30
Check that the application is valid e.g. all the compulsory questions have been completed and the correct fee is included. Check that all particulars are entered on the Case Management System correctly	40
Carry out a Land Registry Search to verify that the applicant is the owner of the land	30
Examine the electrical certificate and any other documentation submitted with licence for validity. Enter actions on the Case Management System.	20
Checks to see whether the applicant has had a site licence revoked in the last three years	30
Obtain the next consecutive site licence number on the park home licence spreadsheet and enter the details of the site against that number.	10
Prepare a draft site licence and send it to the applicant with a covering letter. Include any recommendations and works required resulting from the initial site inspection. Save the draft licence to the Case Management System.	60
Discuss the proposed licence conditions with the applicant if necessary. If amendments are requested by the applicant seek authority from the line manager to amend the conditions.	60
Upon expiry of the consultation period amend the site licence if required. Print out two copies of the site licence and proof read.	60
The site licence is to be checked and signed by the line manager - see below	
Send out the site licence to the applicant with a covering letter.	10
Scan and save the signed copy of the site licence to Case Management System. Insert a hard copy of the licence to paper file.	20
Upon occupation of the site, contact the site owner to make an appointment for a licensing inspection	10
Carry out a full site inspection. Make notes of any breaches of site licence conditions/ works required	60
Additional inspection time for all pitches over and above the first	10
Travel time	26
Record the visit and details on the Case Management System.	20
Complete the risk assessment spreadsheet to determine the next routine visit and print off a hard copy for the paper file	10

Enter the date of the inspection and the next routine inspection on the Case Management System. Enter a scheduled inspection action for the next routine inspection.	10
Send a letter to the applicant notifying them of the outcome of the licensing visit (figure for single pitch site).	10
Additional time relating to the number of pitches over and above the first covered in the letter	5
Update the public register of licensed sites.	15
Additional time for complicated cases (approx 10%) averaged over all applications	24
Additional time to resolve application form queries on site (approx 10%) averaged over all applications	6
Total Time (Officer)	747
Hourly Rate (Officer)	£42.30
Cost Sub-Total (Officer)	£526.64
Site licence to be checked and signed by line manager	30
Hourly Rate (Manager)	£55.09
Cost Sub-Total (Manager)	£27.55
Additional Costs	
Mileage costs from Initial Site Inspection	6.39
Mileage costs from Full Site Inspection	6.39
Mileage costs from resolving application queries on site	0.64
Cost of printing hard copies of plans	0.04
Printing application form and covering letter (4 pages)	0.08
2nd class postage cost for above plus envelope	0.33
Printing of above item for file	0.08
Cost of Land Registry Search	3
Printing Land Registry Search for file	0.04
Printing of 10 A4 pages Draft Licence (8 black and white plus 2 colour) and 2 page covering letter	0.56
2nd class postage cost for above plus A4 envelope	0.58
Printing of above item for file	0.56
Printing of 10 A4 pages Final Licence (8 black and white plus 2 colour) and 2 page covering letter	0.56
2nd class postage cost for above plus A4 envelope	0.58
Printing of above item for file	0.56
Printing risk assessment for file	0.04
Printing page outcome letter (2 pages)	0.04
2nd class postage cost for above plus envelope	0.33
Printing of above item for file	0.04
Cost Sub-Total	£20.84
Grand Total	£575.02

Table A4 - Template for calculating the costs associated with staff time plus fixed costs for the transfer or standard amendment of an existing licence

Number of pitches (amend as required)	2
Average return mileage	14.2

	Time (mins)
Enquiry received and a service request entered on the Case Management System.	20
Send out an application form and covering letter detailing the fee required	15
Upon receipt of an application form scan and attach the form to the Case Management System. Attach a hard copy to the paper file. Enter actions and associated details on the computer database. Generate an acknowledgement letter and send to the applicant.	25
Enter the particulars on from the application form on to the premises record on the Case Management System	15
Check that the application is valid e.g. all the compulsory questions have been completed and the correct fee is included. Check all particulars are entered on the Case Management System correctly	30
Checks to see whether the applicant has had a site licence revoked in the last three years	30
Carry out a Land Registry Search to confirm that the applicant is the new owner of the site	20
Amend the site licence, print out and proof read	30
Amended site licence to be checked and signed by the line manager - see below	
Look up records of outstanding historic breaches, outstanding notices etc.	15
Send the amended site licence to the site owner with a covering letter. Send written notification of the outstanding historic breaches and outstanding notices to new site owner. Add actions to the Case Management System.	20
Scan and attach a signed copy of site licence to the Case Management System and attach a signed hard copy to the paper file.	20
Attach a hard copy of the covering letter and notification of outstanding historic breaches, outstanding notices etc to the paper file	15
Amend the park home site licence spreadsheet and public register of park home site licences.	20
General additions for time taken with telephone conversations and correspondence with the applicant on a typical variation enquiry	25
Additional time for complicated cases (approx 10%) averaged over all applications	20
Additional time to resolve application form queries on site (approx 10%) averaged over all applications	6
Total Time (Officer)	326

Hourly Rate (Officer)	£42.30
Cost Sub-Total (Officer)	£229.83
Amended site licence to be checked and signed by the line manager	15
Hourly Rate (Manager)	£55.09
Cost Sub-Total (Manager)	£13.77
Additional Costs	
Mileage costs from resolving application queries on site	0.64
Printing application form and covering letter 2nd class (4 pages)	0.08
2nd class postage cost for above plus envelope	0.33
Printing of above item for file	0.08
Printing acknowledgement letter	0.04
2nd class postage cost for above plus envelope	0.33
Printing of above item for file	0.04
Cost of Land Registry Search	3
Printing Land Registry Search for file	0.04
Printing of 10 A4 pages Final Licence (8 black and white plus 2 colour) and 2 page letter outlining historic breaches	0.56
2nd class postage cost for above plus A4 envelope	0.58
Printing of above item for file	0.56
Cost Sub-Total	£6.28
Grand Total	£249.88

Table A5 - Template for calculating the additional cost over the standard transfer/amendment fee for site expansions

Number of pitches (amend as required)	1
Inspection time per pitch (mins)	10
Average return mileage	14.2
Average journey time (mins)	26

	Time (mins)
Visit the site to inspect where the variation is in relation to expansion of site etc	26
Inspection time for additional pitches on site.	10
Total Time (Officer)	36
Hourly Rate (Officer)	£42.30
Cost Sub-Total (Officer)	£25.38
Additional Costs	
Mileage costs from Site Inspection	6.39
Cost Sub-Total	£6.39
Grand Total	£31.77

Table A6 - Template for calculating the costs associated with staff time (fixed and per pitch) plus fixed costs for the annual fee

Number of pitches (amend as required)	2
Inspection time per pitch (mins)	10
Average return mileage	14.2
Average journey time (mins)	26

	Time (mins)
Check the site inspection register to determine the next routine inspection	10
Contact the site owner to notify them of the time and date of inspection. Enter the action on the Case Management System.	15
Look up historic breaches records	15
Visit site and carry out routine inspection. Check spacings between units boundaries etc. Check fire precautions. Check certificates. Note all breaches of the site licence. Approx inspection time for first pitch.	30
Additional inspection time for all pitches over and above the first	10
Travel time	26
Complete the risk assessment score sheet and record outcome. Attach to the Case Management System and print a copy for the paper file.	10
Record the details of the visit on the Case Management System including breaches identified. Enter scheduled visit(s) for the next routine inspection and completion of remedial works inspection.	30
Record the visit on the park home inspection spreadsheet	10
Write to the site owner detailing results of inspection and works required to remedy breaches plus any certificates required (figure for single pitch site).	30
Follow up telephone conversations and letters (figure for single pitch site).	15
Attach the letter to Case Management System and attach copy to paper file	10
Additional time for complicated cases (approx 10%) averaged over all applications	24
Total Time (Officer)	235
Hourly Rate (Officer)	£42.30
Cost Sub-Total (Officer)	£165.68
Additional Costs	
Mileage costs - Routine inspection	6.39
Printing risk assessment for file	0.04

Printing two page letter advising on outcome of routine inspection	0.04
2nd class postage cost for above plus envelope	0.33
Printing of above item for file	0.04
Printing of additional letter	0.04
2nd class postage cost for above plus envelope	0.33
Printing of above item for file	0.04
Cost Sub-Total	£7.25
Grand Total	£172.93

Risk-based fees were not thought to be appropriate due to the complexity that this would add and the fact that site owners could pass on the cost of annual licensing fees to residents in the form of increased pitch fees. This would mean that residents on poorly managed sites would be unfairly penalised by having to pay higher fees than residents on better sites. A fee structure based on bands relating to the number of pitches on sites was also not considered to be appropriate as residents on sites at the bottom of a band would end up paying significantly higher fees than residents on sites at the top of a band once site owners recovered this expense on a per pitch basis from them.

It was therefore decided that the most appropriate way to determine annual licensing fees would be to determine the total cost of providing the service across all current non-exempted sites in Central Bedfordshire and to then arrive at a per pitch figure by dividing this cost by the total number of pitches on these sites.

DCLG stated in their Impact Assessment of the consultation “A Better Deal for Mobile Home Owners - Changes to the Local Authority Site Licensing Regime” (published November 2012) that the existing legislation did not allow local authorities to charge fees for issuing and monitoring site licenses, or taking enforcement action if conditions were not met. They added that in practice, this severely limited local authorities’ resources to provide effective scrutiny of the sector. This has meant that historically many Local Authorities have not monitored conditions on licensed sites as regularly as they would want to. In the case of Central Bedfordshire Council this has meant that prior to the Fees Policy sites were inspected with a frequency dictated by their risk assessment with most inspection frequencies falling within the 12-18 month or 18-24 month ranges plus a small number in the 6-12 month range. With the ability to charge annual fees Central Bedfordshire Council aim to increase the frequency of inspections so that all sites paying an annual fee receive at least one inspection per year. This will not only provide more satisfactory monitoring of conditions but will also illustrate to both site owners and residents that they are receiving a service in relation to their annual fee. Risk assessments will still be undertaken to identify higher risk sites that require more than one inspection per year. However, the cost of such additional inspections will not be used in the initial calculation of annual fees as these fees are likely to be passed on to residents through increased pitch fees and therefore would disadvantage them.

Sites that are for holiday use only or are only allowed to have units stationed on them at certain times of the year are exempt from licensing fees by virtue of not falling within the definition of “Relevant Protected Sites”. These are the only statutory exemptions, however, Section 10A (3) of the Caravan Sites and Control of Development Act 1960 as amended enables Local Authorities to fix different fees or to determine that no fee is required to be paid in certain cases or descriptions of case.

It was felt appropriate for Central Bedfordshire Council to make single pitch sites exempt from annual fees (but not other licensing fees) as there are less issues (e.g. spacing) to consider when carrying out routine monitoring compared with multiple pitch sites. Such sites would generally be considered lower risk and as such will not have their inspection frequency increased in the same way that sites attracting an annual fee would. In addition to this, collecting annual fees from single pitch sites would not be cost effective.

The per pitch annual fee was therefore calculated using the total cost of providing the service with the revised inspection frequencies across all current non-exempted sites divided by the total number of pitches on these sites.

Calculation of Annual Fee

The cost of a single inspection for each current non-exempted site was calculated using the template shown in Table A6 and can be translated as follows:

$$((((\text{No. of pitches} - 1) \times 10) + 225) / 60) \times \text{officer hourly rate} + 7.25$$

These figures were then modified by determining how many inspections would be carried out under the new inspection regime per year and the total then divided by the total number of pitches on these sites to arrive at the annual fee of £11.62 per pitch.

Calculation of Initial Licence Fee

We cannot accurately predict the size of new sites requiring an initial licence that may come into existence in the future. However, we have worked on the basis that overall new relevant protected sites will reflect the diversity of the current sites. In order to calculate the initial licence fee per pitch the costs associated with issuing a new licence for each of the relevant protected sites already in existence was calculated using the template shown in Table A3, which translates as follows:

$$((((\text{No. of pitches} - 1) \times 25) + 722) / 60) \times \text{officer hourly rate} + (\text{manager hourly rate} / 2) + 20.839$$

The total of these costs was then divided by the total number of pitches on these sites giving an initial licence fee of £53.61 per pitch

Calculation of Transfer or Standard Amendment Fee

The fee for the transfer or standard amendment (not expansion) of an existing licence was calculated using the template shown in Table A4, which can be translated as follows:

$$((326 / 60) \times \text{officer hourly rate}) + (\text{manager hourly rate} / 4) + 6.279$$

As this does not depend on the number of pitches on the site a per pitch fee is not necessary and therefore the fee for all relevant protected sites is £249.88. This is almost identical to the figure of £250.00 assumed by DCLG in their aforementioned Final Impact Assessment.

Calculation of Site Expansion Amendment Fee

A per pitch fee component was required to add to the standard amendment/transfer fee for amendments to licences for additional units/pitches on sites, as these require site inspection. This component was calculated using the template shown in Table A5, which can be translated as follows:

$$((((\text{No. of pitches}) \times 10) + 26) / 60) \times \text{officer hourly rate}) + 6.39$$

The total for all relevant protected sites was then divided by the total number of pitches on these sites to arrive at a per pitch component of £8.70. The site expansion fee is therefore £249.88 plus £8.70 per additional pitch.

Table A7 – Showing calculated figures for the relevant protected sites in Central Bedfordshire

Site	No. of pitches for Fee Calc	Return Mileage	Cost of single Inspection	Proposed Frequency of Inspection	Inspections per year	Cost per year on Proposed Frequency	Cost per Pitch on Proposed Frequency	Site Fee on Proposed Frequency	Cost of Initial Licence	Cost of Expansion Amendment Fee (excluding standard amendment transfer fee aspect)	Cost of amendment/transfer
Site 1	1	20	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 2	1	19	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 3	1	19	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 4	13	25	£ 250.48	12	1	£ 250.48	£ 11.62	£ 151.04	£ 768.89	£ 116.37	£ 249.88
Site 5	20	24	£ 299.83	12	1	£ 299.83	£ 11.62	£ 232.37	£ 892.27	£ 165.72	£ 249.88
Site 6	1	10	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 7	1	10	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 8	3	6	£ 179.98	12	1	£ 179.98	£ 11.62	£ 34.86	£ 592.64	£ 45.87	£ 249.88
Site 9	1	6	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 10	1	6	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 11	11	6	£ 236.38	12	1	£ 236.38	£ 11.62	£ 127.80	£ 733.64	£ 102.27	£ 249.88
Site 12	3	8	£ 179.98	12	1	£ 179.98	£ 11.62	£ 34.86	£ 592.64	£ 45.87	£ 249.88
Site 13	42	6	£ 454.93	12	1	£ 454.93	£ 11.62	£ 487.98	£ 1,280.02	£ 320.82	£ 249.88
Site 14	74	9	£ 680.53	12	1	£ 680.53	£ 11.62	£ 859.77	£ 1,844.02	£ 546.42	£ 249.88
Site 15	29	13	£ 363.28	12	1	£ 363.28	£ 11.62	£ 336.94	£ 1,050.89	£ 229.17	£ 249.88
Site 16	100	10	£ 863.83	12	1	£ 863.83	£ 11.62	£ 1,161.86	£ 2,302.27	£ 729.72	£ 249.88
Site 17	1	12	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88

Site 18	39	35	£	433.78	12	1	£ 433.78	£ 11.62	£ 453.12	£ 1,227.14	£ 299.67	£ 249.88
Site 19	1	7	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 20	1	5	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 21	11	8	£	236.38	12	1	£ 236.38	£ 11.62	£ 127.80	£ 733.64	£ 102.27	£ 249.88
Site 22	1	5	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 23	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 24	1	11	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 25	5	10	£	194.08	12	1	£ 194.08	£ 11.62	£ 58.09	£ 627.89	£ 59.97	£ 249.88
Site 26	26	15	£	342.13	12	1	£ 342.13	£ 11.62	£ 302.08	£ 998.02	£ 208.02	£ 249.88
Site 27	8	14	£	215.23	12	1	£ 215.23	£ 11.62	£ 92.95	£ 680.77	£ 81.12	£ 249.88
Site 28	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 29	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 30	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 31	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 32	11	14	£	236.38	12	1	£ 236.38	£ 11.62	£ 127.80	£ 733.64	£ 102.27	£ 249.88
Site 33	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 34	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 35	3	14	£	179.98	12	1	£ 179.98	£ 11.62	£ 34.86	£ 592.64	£ 45.87	£ 249.88
Site 36	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 37	1	14	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 38	30	38	£	370.33	12	1	£ 370.33	£ 11.62	£ 348.56	£ 1,068.52	£ 236.22	£ 249.88
Site 39	175	35	£	1,392.58	12	1	£ 1,392.58	£ 11.62	£ 2,033.25	£ 3,624.14	£ 1,258.47	£ 249.88
Site 40	4	38	£	187.03	12	1	£ 187.03	£ 11.62	£ 46.47	£ 610.27	£ 52.92	£ 249.88
Site 41	1	16	£	165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 42	35	13	£	405.58	12	1	£ 405.58	£ 11.62	£ 406.65	£ 1,156.64	£ 271.47	£ 249.88
Site 43	29	13	£	363.28	12	1	£ 363.28	£ 11.62	£ 336.94	£ 1,050.89	£ 229.17	£ 249.88

Site 44	1	14	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 45	62	14	£	595.93	12	1	£	595.93	£	11.62	£	720.35	£	1,632.52	£	461.82	£	249.88
Site 46	17	14	£	278.68	12	1	£	278.68	£	11.62	£	197.52	£	839.39	£	144.57	£	249.88
Site 47	1	15	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 48	15	25	£	264.58	12	1	£	264.58	£	11.62	£	174.28	£	804.14	£	130.47	£	249.88
Site 49	4	24	£	187.03	12	1	£	187.03	£	11.62	£	46.47	£	610.27	£	52.92	£	249.88
Site 50	15	25	£	264.58	12	1	£	264.58	£	11.62	£	174.28	£	804.14	£	130.47	£	249.88
Site 51	1	6	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 52	1	6	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 53	1	6	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 54	1	6	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 55	41	9	£	447.88	12	1	£	447.88	£	11.62	£	476.36	£	1,262.39	£	313.77	£	249.88
Site 56	41	9	£	447.88	12	1	£	447.88	£	11.62	£	476.36	£	1,262.39	£	313.77	£	249.88
Site 57	1	6	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 58	1	16	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 59	1	16	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 60	1	15	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 61	120	9	£	1,004.83	12	1	£	1,004.83	£	11.62	£	1,394.23	£	2,654.77	£	870.72	£	249.88
Site 62	150	14	£	1,216.33	12	1	£	1,216.33	£	11.62	£	1,742.79	£	3,183.52	£	1,082.22	£	249.88
Site 63	5	6	£	194.08	12	1	£	194.08	£	11.62	£	58.09	£	627.89	£	59.97	£	249.88
Site 64	30	5	£	370.33	12	1	£	370.33	£	11.62	£	348.56	£	1,068.52	£	236.22	£	249.88
Site 65	1	16	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 66	1	14	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 67	5	6	£	194.08	12	1	£	194.08	£	11.62	£	58.09	£	627.89	£	59.97	£	249.88
Site 68	1	14	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88
Site 69	1	17	£	165.88	24	0.5	£	82.94	£	11.62	£	-	£	557.39	£	31.77	£	249.88

Site 70	1	18	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 71	1	18	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 72	1	18	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 73	1	25	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 74	6	20	£ 201.13	12	1	£ 201.13	£ 11.62	£ 69.71	£ 645.52	£ 67.02	£ 249.88
Site 75	1	14	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 76	1	14	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 77	1	14	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 78	1	14	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 79	1	14	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 80	1	14	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 81	1	14	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
Site 82	1	14	£ 165.88	24	0.5	£ 82.94	£ 11.62	£ -	£ 557.39	£ 31.77	£ 249.88
		Average				Total					
		14.2				£17,714.15			Annual Fee per pitch	£ 11.62	
			Total Number of Pitches	1230		Exc exempt sites			Initial Licence Fee per pitch	£ 53.61	
			Total No. of non-exempt pitches	1182		£13,733.15			Transfer or Standard Amendment Fee per site	£ 249.88	
									Expansion Fee per additional pitch to be added to standard fee	£ 8.70	

Calculation of Fees for depositing Site Rules

It is expected that it will take approximately 1 hour of Technical Support Officer time to deal with site rules deposited by Site Owners including checking that the rules have been made in accordance with the statutory procedure and updating the associated register. Therefore given the hourly rate shown in Table A8 below supplied by the Adult Social Care, Health and Housing Finance Team for the Technical Support Officers who would be responsible for this, a fee for depositing site rules should be set at £30.91.

Table A8 – Average hourly rate for Technical Support Officers

Technical Support Officers on 100% FTE

TSO1	34,446.00
TSO2	31,257.00
TSO3	36,300.00
Total	102,003.00
Average	34,001.00
Support service 40%	13,600.40
No Of Staff	3
Total average staff Cost per annum	47,601.40
Productive Hours Per annum	1,540
Hourly Rate	£30.91

Calculation of Fees for Fit and Proper Persons Register Applications

The benchmarking exercise shown in Appendix B revealed that most of the Local Authorities that responded believed that proper fit and proper person checks would take 120 minutes. It is anticipated that updating and publishing a register would take a further 30 minutes, giving a total of 150 minutes. The fit and proper person checks are likely to be carried out by the same officers who would carry out the licensing (average hourly rate of £42.30 as per Table A1), and therefore the fee should be set at £105.75.

Appendix B Benchmarking

Table B1 – Benchmarking of Initial Licence Fee Calculations

Initial Licence Fee Calculation						
	Initial CBC figures	LA1	LA2	LA3	LA4	Adjusted CBC figures
Enquiry received and service request entered on Case Management System.	30	30	30	30	30	30
Obtain planning documents. Record type of development permitted and restrictions etc on Case Management System. Print hard copies of planning documents.	30	30	30	30	30	30
Make up new caravan site/Park home site file and attach above documentation	20	20	20	20	20	20
Send out site application form with covering letter and enter action on Case Management System.	15	15	15	15	15	15
Contact applicant and make appt to carry out initial site inspection enter action on Case Management System.	10	10	20	10	10	10
Carry out initial site inspection. Advise applicant as necessary on layout, spacing and other site licence conditions. Help applicant complete application form, if required. Enter record of inspection on Case Management System. Approx inspection time for first unit.	30	30	30	30	60	30
Travel Time	60	60	60	60	60	26
Enter particulars on application form on to premises record on Case Management System. Scan and save application form to Case Management	30	30	30	30	30	30

System.						
Check application valid e.g. all compulsory questions completed and correct fee included. Check all particulars entered on computer premises record correctly	40	40	60	40	40	40
Carry out Land Registry Search to verify applicant is owner of land	30	30	15	30	30	30
Examine electrical certificate and any other documentation submitted with licence for validity. Enter action on Case Management System.	20	20	20	20	20	20
Fit and Proper Persons Checks/Checks to see whether applicant has had a site licence revoked in the last three years (b)	120	120	60	120	120	30
Obtain next consecutive site licence number on park home licence spreadsheet and enter details of site against that number.	10	10	10	10	10	10
Prepare draft site licence and send to applicant with covering letter. Include any recommendations and works required resulting from initial site inspection. Save draft licence to Case Management System.	60	60	60	60	60	60
Discuss any feedback with applicant on proposed site licence conditions with applicant. If amendments requested seek authority with line manager to amend conditions.	60	60	60	60	60	60
Upon expiry of consultation period amend site licence if required . Print out two	60	60	30	60	60	60

copies of site licence and proof read.						
Site licence to be checked and signed by line manager - see below	30	30	30	30	30	30
Send out site licence to applicant with covering letter.	10	10	15	10	10	10
Scan and save signed copy of site licence to Case Management System and link to computer worksheet. Insert hard copy of licence to paper file.	20	20	20	20	20	20
Update public register of licensed sites.	15	15	10	15	15	15
Upon occupation of site contact site owner to make appointment for licensing inspection	10	10	20	10	10	10
Carry out full site inspection. Make note of any breaches of site licence conditions/ works required	60	60	30	60	60	60
Travel time	60	60	60	60	60	26
Record visit and details on Case Management System.	20	20	20	20	20	20
Complete risk assessment spreadsheet to determine next routine visit and print off hard copy for file	10	10	NA	10	10	10
Enter date of inspection and next routine inspection on Case Management System. Next routine inspection as scheduled inspection on premises worksheet.	10	10	NA	10	10	10
Send letter to applicant notifying them of outcome of licensing visit (figure for single unit site).	10	10	15	10	60	10
Additional time for complicated cases (a)	24	24	NA	24	24	24
Additional time to resolve application form queries on site (a)	6	6	6	6	6	6
Total fixed time (mins)	910	910	776	910	990	752

Additional inspection time for all pitches over and above the first (initial)	10	10	10	10	covered in fixed cost	10
Additional inspection time for all pitches in addition over and above the first (Full inspection)	10	10	10	10	single addition of 30 for large sites	10
Additional time relating to the number of units over and above the first covered in the letter	5	5	10	5	covered in fixed cost	5
Variable time (mins per pitch)	25	25	30	25	single addition of 30 for large sites	25

(a) adjusted to (approx 10%) averaged over all applications

(b) adjusted for amended CBC figure as full Fit and Proper Persons checks not implemented and would be charged separately

Table B2 – Benchmarking of Amendment or Transfer Fee Calculations

Amendment or Transfer Fee Calculation						
	Initial CBC figures	LA1	LA2	LA3	LA4	Adjusted CBC figures (c)
Enquiry received and service request entered on computer system.	20	20	10	20	20	20
Send out application form and covering letter detailing fee required	15	15	20	15	15	15
Upon receipt of application form, scan and attach form to computer worksheet. Attach hard copy to paper file. Enter action on computer database and associated details. Generate acknowledgement letter and send to applicant.	30	30	30	30	30	25
Enter particulars on application form on to premises record on computer system	15	15	10	15	15	15

Check application valid e.g. all compulsory questions completed and correct fee included Check all particulars entered on computer premises record correctly	30	30	60	30	30	30
Fit and Proper Person's Checks/Checks to see whether applicant has had a site licence revoked in the last three years (b)	120	120	60	120	120	30
Carry out LRS to confirm applicant is new owner of the site	30	30	15	30	30	20
Amend site licence print out and proof read	60	60	60	60	60	30
Amended site licence to be checked signed by line manager	30	30	30	30	30	15
Look up records of outstanding historic breaches, outstanding notices etc.	15	15	10	15	15	15
Send amended site licence to site owner with covering letter. Send written notification of outstanding historic breaches and outstanding notices to new site owner. Add to actions to electronic worksheet.	20	20	30	20	20	20
Scan and attached signed copy of site licence to electronic worksheet and attached signed hard copy to paper file.	20	20	15	20	20	20
Attach hard copy of covering letter and notification of outstanding historic breaches and outstanding notices etc to electronic and paper file	15	15	15	15	15	15
Amend park home site licence spreadsheet and public register of park home site licences.	20	20	20	20	20	20
General additions time taken with telephone conversations and correspondence with applicant on typical	90	90	60	90	90	25

variation enquiry						
Additional time for complicated cases (a)	24	24	NA	24	24	20
Additional time to resolve application form queries on site (a)	6	6	NA	6	6	6
Total fixed time (mins)	560	560	445	560	560	341

(a) adjusted to (approx 10%) averaged over all applications

(b) adjusted for amended CBC figure as full Fit and Proper Persons checks not implemented and would be charged separately

(c) adjusted so as to bring the cost in line with the average assumed by DCLG in their impact assessment

Table B3 – Benchmarking of Annual Fee Calculations

Annual Fee Calculation						
	Initial CBC figures	LA1	LA2	LA3	LA4	Adjusted CBC figures
Check the site inspection register to determine the next routine inspection	10	10	10	10	10	10
Contact the site owner to notify them of the time and date of inspection. Enter the action on the Case Management System.	15	15	25	15	15	15
Look up historic breaches records	15	15	NA	15	15	15
Visit site and carry out routine inspection. Check spacings between units boundaries etc. Check fire precautions. Check certificates. Note all breaches of the site licence. Approx inspection time for first pitch.	30	30	30	30	60	30
Travel time	60	60	60	60	60	26
Complete the risk assessment score sheet and record outcome. Attach to the Case Management System and print a copy for the paper file.	10	10	NA	10	10	10

Record the details of the visit on the Case Management System including breaches identified. Enter scheduled visit(s) for the next routine inspection and completion of remedial works inspection.	30	30	60	30	30	30
Record the visit on the park home inspection spreadsheet	10	10	NA	10	10	10
Write to the site owner detailing results of inspection and works required to remedy breaches plus any certificates required (figure for single pitch site).	15	15	30	15	60	30
Follow up telephone conversations and letters (figure for single pitch site).	15	15	15	15	60	15
Attach the letter to Case Management System and attach copy to paper file	10	10	NA	10	10	10
Carry out an inspection to ensure the works requested have been carried out (figure for single pitch site).	30	30	30	30	60	0
Travel time	60	60	60	60	60	0
Record the visit on the park home spreadsheet and Case Management System	10	10	NA	10	10	0
Letter to licence holder notifying them of the outcome of the visit. Record the action on the Case Management System. Assume all works complete as further action likely to result in service of notice and will therefore come under notice fees	10	10	10	10	30	0
Additional time for complicated cases (a)	24	24	NA	24	24	24
Total fixed time (mins)	354	354	330	354	524	225
Additional inspection time for all pitches over and above the first (initial)	10	10	10	10	single addition of 60 for large	10

					sites	
Additional time relating to the number of pitches over and above the first covered in the letter	5	5	5	5	covered in fixed cost	0
Additional time relating to the number of pitches over and above the first covered by the phone calls and letters	15	15	NA	15	covered in fixed cost	0
Additional inspection time for all pitches over and above the first (Follow up inspection)	10	10	10	10	covered in fixed cost	0
Variable time (mins per pitch)	40	40	25	40	single addition of 60 for large sites	10

(a) adjusted to (approx 10%) averaged over all applications

Table B4 - Summary of Benchmarking (in minutes)

Fee Element	Initial CBC figures	LA1	LA2	LA3	LA4	Adjusted CBC figures
Initial Licence fixed fee (a)	820	820	746	820	900	752
Initial Licence per pitch fee	25	25	30	25	single addition of 30 for large sites	25
Amendment & Transfer Fee (a)	470	470	415	470	470	341
Annual Fee fixed element	354	354	330	354	524	225
Annual Fee per pitch fee	40	40	25	40	single addition of 60 for large sites	10

(a) All LA figures adjusted to replace full Fit and Proper Persons checks with checks that licences have not been revoked as there is currently no date for

the implementation of Fit and Proper Person checks and would be charged separately in any case.

The DCLG Working Group on Park Homes Licensing Fees indicated that it may be better to apply the cost of re-inspections through a surplus/deficit mechanism in the annual fee for subsequent years rather than including within the base annual fee. This would ensure that residents would not be adversely affected by the cost of re-inspections resulting from poor management, as site owners would only be able to take into account the base fee when recovering the cost of annual fees through pitch fees. As a consequence aspects relating to re-inspections were removed from the template and formula used to calculate annual fees and the final column of Table B4 was adjusted accordingly.

LA4 plan to use a slightly higher fixed element for the initial licence and annual fee, adding 30 or 60 minutes respectively for large sites rather than using a per pitch element. In the context of the large number of sites with significantly different numbers of pitches in Central Bedfordshire such an approach would appear not to be appropriate. By way of example it would take far more than 30 minutes of additional time to inspect a site with 175 pitches than one with just 1 or 2 pitches on when accurate measurements of distances between adjacent units, distances between units and roads, and distances between units and boundaries are required.

Appendix C Fees and Charges Schedule Entry

A summary of the fees contained within the Park Homes Fees Policy is provided below for inclusion within the Council's Fees and Charges Schedule.

Once incorporated within the Council's Fees and Charges Schedule park home fees and charges will be adjusted each year by the same mechanism as other fees and charges on the schedule.

Additions

Caravan and Mobile Home Site Licensing Fees

	Initial Licence Fee	Standard Amendment or Transfer Fee	Site Expansion Amendment Fee	Annual Fee
Fee	£53.61 per pitch	£249.88 per site/application	Standard Amendment Fee (£249.88) plus £8.70 per additional pitch	£11.62 per pitch

These fees only apply to "relevant protected sites" and therefore the following categories of sites are exempt:

- Sites not requiring licensing
- Sites for holiday use only
- Sites where there are times of the year where no caravan may be stationed

In addition to this Single Pitch Sites are currently exempted from Annual Fees.

Annual fees may be adjusted to take into consideration any deficit or surplus in the account for annual fees from previous years.

For the sake of clarity, annual fees will be determined by the number of pitches that the licence permits.

Fee for Fit and Proper Persons Register Applications = £105.75
(only applies to relevant protected sites)

Fee for Depositing Site Rules with the Council = £30.91

Amendment to Existing Entry

Housing Act 2004 Enforcement entry in the SCH&H section of the Fees and Charges Schedule to be amended for 2014/15 onwards so that the title reads **"Housing Act 2004 and Park Homes Enforcement (VAT n/a)"** and the entry beneath reads:

"Recipient of Housing Act or Park Homes Enforcement Notice (per person)"

And

"Admin charge for undertaking Works in Default in relation to enforcement activity - per Enforcement Notice"