

Development Management Plan (Regulation 19)

**Strategic Housing Market Assessment
Addendum: Non-Traveller mobile homes and
caravans - background paper**

December 2017

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1. Introduction

- 1.1 This paper reviews the Council's position in relation to planning for mobile homes and caravans (for non-Travellers). The accommodation needs of Gypsies, Travellers and Travelling Show-people are addressed separately in the *Gypsy and Traveller Accommodation Assessment* (GTAA) and the *Traveller Strategic Land Availability Assessment* (TSLAA).
- 1.2 This paper explains the approach taken to provision for mobile homes and caravans in the Development Management Plan (DMP) at Regulation 19 stage, and can be considered as an addendum to the Council's *Strategic Housing Market Assessment* (SHMA).
- 1.3 Section 2 sets out some background information about mobile homes parks, and section 3 presents relevant current legislation and national guidance on provision for this subject area. Local policy is set out in section 4 regarding the Core Strategy. Section 5 presents the approach taken so far in addressing the need for non-Traveller mobile homes and caravans in the borough, and possible future approaches.

2. Planning Policy Context

Legislation

- 2.1 Provisions set out in the Housing and Planning Act (2016) include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. The draft Guidance (referred to below) related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment.

National Planning Policy and Guidance

National Planning Policy Framework (2012)

- 2.2 The *National Planning Policy Framework* (NPPF) is national-level guidance for England in relation to local plan-making and decision-taking in development management.
- 2.3 Section 6 of the NPPF, *Delivering a wide choice of high quality homes* sets out the general requirement for Local Plans to meet the objectively assessed housing needs of the area covered by the Plan and identify key sites. Paragraph 50 also sets out an expectation that local planning authorities

should plan for a mix of housing, taking account of demographic trends and the needs of different groups in society, identifying the types of housing required locally. Reigate and Banstead BC consider that this applies to Mobile Home dwellers, the subject of this paper.

Draft guidance on the review of housing needs for caravans and houseboats (2016), DCLG

- 2.4 The Government's draft guidance *Review of housing needs for caravan and houseboats* (2016) has set out that the assessment of needs for caravans/mobile homes should include people of any race or origin and those with a preference for this type of accommodation. There is now a clear requirement to consider caravans and mobile homes beyond what is addressed for Travellers, who are covered under the Government guidance *Planning Policy for Traveller Sites 2015* (PPTS). This assessment may also include the needs of some Travellers who no longer fall under the definition of Travellers under PPTS 2015.

Local policy context

Reigate & Banstead Borough: Core Strategy (2014)

- 2.5 The Core Strategy contains the strategic-level policy of the Borough's emerging Local Development Framework, and it was adopted in 2014. It addresses the need for the appropriate mix of housing, but makes no specific mention of non-Traveller mobile homes and caravans.
- 2.6 Nonetheless, Policy CS14 recognises the need to deliver a broad range of housing and accommodation to meet the requirements of different types of households within the borough. The supporting text (at 7.5.2) also discusses the importance of addressing the current and future needs of older people across all tenures.

3. Borough Context

- 3.1 According to the House of Commons briefing paper on Mobile Park Homes (2016), most people living year-round in mobile homes parks are home-owners and rent the land via a pitch fee. The Government estimates that there are approximately 85,000 mobile homes in England, and that these are on 2,000 sites. According to the briefing paper, mobile homes parks are attractive to older people.
- 3.2 The Council licences all Caravan and Mobile Home sites. In total the Council's website lists nine caravan and mobile home sites but for the

purposes of this assessment we are disregarding sites that are accommodation for agricultural workers, or Traveller sites which are considered elsewhere as set out above.

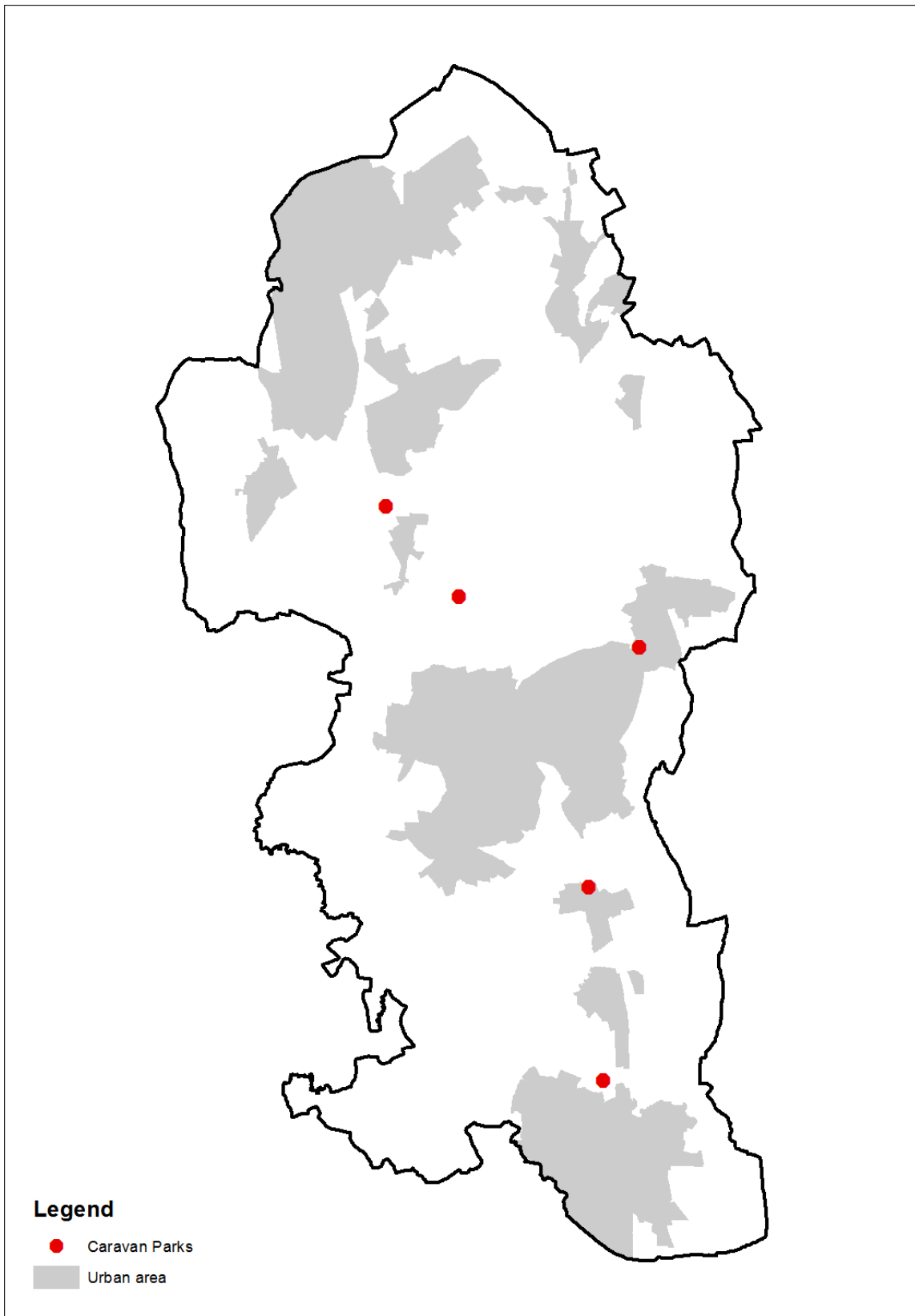
3.3 There are therefore five public Mobile Home sites in the borough, totalling 343 pitches, all of which are run privately. The Council does not operate any sites.

3.4 The Mobile Home sites are as follows:

Site Name	Location	Details
Cambridge Lodge Mobile Home Park	Bonehurst Rd, Horley	<ul style="list-style-type: none"> • Licensed for 80 homes • Age restricted to over 45
Holly Lodge Mobile Home Park	Brighton Rd, Lower Kingswood	<ul style="list-style-type: none"> • Licensed for 158 homes • Age restricted to over 50
Subrosa Mobile Home Park	Subrosa Drive, Merstham, Redhill	<ul style="list-style-type: none"> • Licensed with conditions for 74 homes • Age restricted to over 45
Three Arch Mobile Home Park	Three Arch Rd, Redhill	<ul style="list-style-type: none"> • Licensed for 25 homes • Age restricted to over 50
Yew Cottage Mobile Home Park	Brighton Rd, Lower Kingswood	<ul style="list-style-type: none"> • Licensed for 6 homes • No age restriction

3.5 The locations of the sites listed as licenced mobile home parks on the Council's website are included on the map below.

Map 1: Distribution of licenced mobile home parks in Reigate & Banstead



4. Assessment of need and provision

- 4.1 The DMP does not address the need for houseboat moorings because the waterways within Reigate & Banstead borough are not suitable. However there is a clearly defined requirement to address the needs of people wishing to live in mobile homes or caravans, as set out in legislation and policy.

Travellers

- 4.2 This assessment does not include any element of Traveller need. The *Gypsy and Traveller Accommodation Assessment 2017* (GTAA) reviewed the need for pitches and plots in the borough between 2016 and 2031. This GTAA 2017 took account of the Government's August 2015 change to the statutory definition of "Traveller".
- 4.3 The implication of the *Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats* is that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller may need to be assessed as part of the wider housing needs of the area through the SHMA process, and will form a subset of the wider need arising from households residing in caravans.
- 4.4 However, the Council has taken legal advice which concluded that under the 2010 Equalities Act it should consider the accommodation needs of Romany Gypsies, and Irish and Scottish Travellers even if they do not fall under the planning definition of Traveller. Information available from planning applications, enforcement cases and household interviews carried out for the GTAA indicate that in Reigate and Banstead borough all those included in the needs assessment identify as Irish Travellers or fall under the planning definition. In light of this legal advice the Council are seeking to meet the full identified level of need as far as possible. Therefore, this assessment will not include Traveller need.

Current and Future Need

- 4.5 The Reigate & Banstead *Strategic Housing Market Assessment* (SHMA) was updated in 2012 to assist the Council's understanding of the nature and level of housing demand and need, both affordable and market, within the borough. As the SHMA was completed in 2012 and the Housing and Planning Act (and associated draft guidance) was only published in 2016, an assessment of non-Traveller mobile homes and caravan needs was not covered in the current SHMA. As such, this addendum to the SHMA seeks to address this need.

- 4.6 The planning policy team has carried out a survey of current mobile home park owners and/or managers in the borough, which indicates that additional need may exist, but it is not possible from this small sample size to draw any substantive conclusions - the exact demand for mobile homes is currently not quantified so the DMP does not propose to allocate sites for non-Traveller mobile homes or caravan sites. A criteria-based policy is included in the DMP, and sites will be assessed against this on a case-by-case basis.

Mobile home parks questionnaire survey/further assessment

- 4.7 Owners and managers of the aforementioned mobile home sites in the borough were sent paper questionnaire forms to fill out and send back (with pre-paid envelopes) in March 2017, and where it was possible to find email addresses (for three sites) an email version was also sent. Follow-up emails were also sent in June 2017.
- 4.8 The questionnaire is included at Appendix 1. The questions in the questionnaire were included to allow us to gain an understanding of how mobile homes sites for non-Travellers operate the demand for pitches, and demographic information about those living on these sites, and an indication of the reasons people have for choosing to live in mobile accommodation.
- 4.9 Three responses were received; however, two of these responses were from two separate respondents from the same site. This is obviously a very limited sample, but it does give an indication of how the sites are run in the borough, and what some of the potential issues might be. Of the responses:
- The respondent from one site stated that pitches are leased to occupiers, and this was implied by the respondent from the other site.
 - Both sites have no restrictions on length of stay, but do restrict occupiers to aged 50 and over only. Respondents from both sites said that their clientele was mostly retired couples. However, neither site was involved with any kind of sheltered accommodation.
 - Respondents from both sites said that generally people stay at the site for a long period of time, usually staying until they die or until going into some kind of care.
 - Respondents from both sites indicated or stated that there are very low vacancy rates at the sites and that pitches were usually taken immediately. Neither normally had unoccupied pitches.
 - Respondents from both sites felt that demand had been growing in recent years. The respondent from one site stated that the waiting time for a pitch was about a year and that between 10 and 20 households could be on that list at any given time.
 - The responses from both sites indicated that the people applying to the site largely come from Reigate & Banstead, with some also coming from Surrey and neighbouring counties, and sometimes from further afield as well.

- Downsizing and financial reasons were indicated as reasons for people choosing to live in mobile accommodation. The owner of one site also gave reasons of security and sociability.
- 4.10 The owner of one site noted that they would like to expand their existing site. However, their site is within the Green Belt and it is not felt that there is a strong enough demand to justify exceptional circumstances to enable amendment of the Green Belt boundary.
- 4.11 The Council will regularly assess and monitor planning applications and any expressions of need for non-Traveller mobile home sites and space for caravans. This will form part of the future assessment of housing needs and allow for the consideration of whether any specific allocation of land be proposed in the next Local Plan review.
- 4.12 The *Draft guidance to local housing authorities on the periodical review of housing needs* (March, 2016) includes the need to consider: overcrowding on sites; suppressed households; and those without land or a place on a site, and this may be something that will need to be addressed in future as part of SHMA updates. This may also need consideration in relation to the needs and/or preferences of older people.

5. Conclusions

- 6.1 The Council has identified that further work will be needed to review the needs of non-Traveller groups choosing to live in mobile accommodation or resorting to the borough for this purpose, in line with legislation and the emerging guidance *Review of housing needs for caravans and houseboats*. This would form part of a SHMA update.
- 6.2 A proportionate approach has been taken to understanding need for the DMP at this stage. More detailed research is likely to form part of any future SHMA update but, until such a time, the DMP Regulation 19 draft includes a criteria-based policy in relation to planning applications for non-Traveller mobile home sites.
- 6.3 Monitoring of need for this type of accommodation will be important to inform future assessments.

Appendix 1: Mobile home park owners/managers questionnaire

Reigate & Banstead Borough Council

Survey to understand the demand for mobile homes in Reigate & Banstead Borough

Reigate & Banstead Borough Council must take account of the housing needs of everyone who lives, or may choose to live, in the borough, including in mobile homes or caravans.

You have been sent this survey as the owner or manager of a local mobile home park. The purpose of this survey is to help the Council work out the level of existing provision and the demand for additional mobile homes in the borough, and to understand whether it needs to allocate additional sites for mobile homes in its Local Plan. More information on the Council's Local Plan can be found at www.reigate-banstead.gov.uk/dmp.

We would therefore be grateful for your response to the survey, but recognise that there may be questions you do not feel able to answer.

If you are not the correct person to complete this survey we would be happy for you to forward it on; alternatively please let us know at LDF@reigate-banstead.gov.uk.

All responses will be treated anonymously - we will not divulge the personal details of any individuals or households, but will summarise general facts and figures.

Completed surveys should be returned to us by 10 April 2017.

You can complete and return this survey in any of the following ways:

- We can send you a copy of the survey for you to email back to us (please contact us on the email address above or call 01737 276178);
- You can scan this paper questionnaire and email it back to LDF@reigate-banstead.gov.uk; or

- Paper questionnaires can be returned in the stamped addressed envelope provided.

1. What is the address of your mobile home park, and your name and contact details?	
Mobile home park address and postcode:	
Your name:	
Your email address:	
Your phone number:	
2. Are you the owner or manager of the site?	
Please circle as appropriate	
Owner / manager / other (please state):	
3. We understand that pitches are generally leased to households/individuals for them to park their own homes on. Is this how your site operates?	
Please circle as appropriate:	
a) Yes	
b) Yes, but there are also other arrangements	
c) No	
If you answered (b) or (c), please explain how the site is run (for example, can people purchase pitches/mobile homes from you?).	

4. Are you (or have you ever been) a part of a sheltered accommodation system? Do you advertise or provide facilities for older people with specific needs? If so, please give details.

5. It would be useful for us to understand the demand for pitches; for example whether you have waiting lists or vacancies.

Please circle (a), (b) or (c) and provide further explanation if possible:

a) **There is usually a significant waiting list.**

- How long are people generally on the list?

- Are there individuals/households currently on a waiting list and if so how many?

b) **There are usually some vacancies.**

- What sort of vacancy rate is usual?

- What is the average length of time plots or units are vacant?
- Are there any pitches/homes currently unoccupied and if so how many?

c) **There is a balance between availability and demand for pitches or homes most of the time.**

6. Over the past five years, how has the demand for space at your site changed?

7. How much turnover do you get typically? How long do people tend to stay at your site? Do some people leave and return to your site?

Please describe turnover and typical lengths of stay:

Do people tend to leave and return to the site (please circle as appropriate)?

- a) Some people do b) No

8. Do you have any restrictions on people staying at the site? For example, restrictions on the number of months per year that pitches can be occupied (either minimum or maximum weeks at a time) or age of residents. Is this something you have implemented or outside of your own control?

Restrictions of length of stay at the site (please circle as appropriate):

a) Yes

b) No

Details of restriction:

9. Do you have enough space for the number of mobile homes that you would like to accommodate at your site? If not, how much space would you ideally like, and for what purposes (for example, number of pitches, other facilities, etc.)?

10. It is helpful for us to understand where demand is coming from; thinking of those on any waiting lists and those living on your site, could you indicate the locations people come from?

Circle all applicable options below:

a) Reigate & Banstead Borough

b) Other Surrey boroughs

c) London

d) Sussex/Kent

e) Further afield (please specify)

11. Could you provide an idea of the sorts of people that are living at your site? For example, older/retired or younger people; working and non-working people; families with children, and size of households etc.?

12. Do you know why people on your site chose to live in mobile homes rather than in houses –for example: costs, freedom to travel, etc.?

13. Do you have any other comments that might help us understand about the need for mobile home living (whether permanent or short term) in the borough?

Please use this box to continue any answers which don't fit in the boxes provided (please reference the question number). You can also add additional sheets:

Thank you for taking the time to respond to our questionnaire.