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MID DEVON DISTRICT COUNCIL

REGULATORY COMMITTEE

A **MEETING** of the **REGULATORY COMMITTEE** will be held in the Phoenix Chamber, Phoenix House, Tiverton on Thursday, 3 September 2015 at 11.00 am

KEVIN FINAN

Chief Executive
26 August 2015

Councillors: Mrs E M Andrews, K Busch, R J Chesterton, Mrs F J Colthorpe, D R Coren, N V Davey, Mrs G Doe, J M Downes, C J Eginton, P H D Hare-Scott, T G Hughes, Mrs B M Hull, D J Knowles, J Smith and L Taylor

A G E N D A

MEMBES ARE REMINDED OF THE NEED TO MAKE DECLARATIONS OF INTEREST PRIOR TO ANY DISCUSSION WHICH MAY TAKE PLACE

- 1 **ELECTION OF CHAIRMAN**
To elect a Chairman of the Regulatory Committee for the Municipal Year 2015/16.
- 2 **ELECTION OF VICE CHAIRMAN**
To elect a Vice Chairman of the Licensing Committee for the Municipal Year 2015/16.
- 3 **APOLOGIES AND SUBSTITUTE MEMBERS**
To receive any apologies for absence and notices of appointment of Substitute Members (if any).
- 4 **PUBLIC QUESTION TIME**
To receive any questions relating to items on the Agenda from members of the public and replies thereto.
- 5 **MINUTES** (*Pages 3 - 4*)
To approve the minutes of 18 December 2014 (copy attached).
- 6 **HACKNEY CARRIAGE AND PRIVATE HIRE FEES AND CHANGES FOLLOWING THE INTRODUCTION OF THE DEREGULATION ACT** (*Pages 5 - 16*)
To receive a report of the Head of Human Resources and Development

outlining the amendments made by the Deregulation Act 2015 which has led to the review of the current fees and to consider adopting the licensing fees as set out in the report.

7 MOBILE HOMES ACT *(Pages 17 - 20)*

To receive a report of the Head of Human Resources and Development informing Members of the Provision of the Act.

The Human Rights Act 1998 came into force on 2nd October 2000. It requires all public authorities to act in a way which is compatible with the European Convention on Human Rights. The reports within this agenda have been prepared in light of the Council's obligations under the Act with regard to decisions to be informed by the principles of fair balance and non-discrimination.

Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so, as directed by the Chairman. Any filming must be done as unobtrusively as possible from a single fixed position without the use of any additional lighting; focusing only on those actively participating in the meeting and having regard also to the wishes of any member of the public present who may not wish to be filmed. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairman or the Member Services Officer in attendance so that all those present may be made aware that is happening.

Members of the public may also use other forms of social media to report on proceedings at this meeting.

Members of the public are welcome to attend the meeting and listen to discussion. Lift access to the Council Chamber on the first floor of the building is available from the main ground floor entrance. Toilet facilities, with wheelchair access, are also available. There is time set aside at the beginning of the meeting to allow the public to ask questions.

An induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter. If you require any further information, or

If you would like a copy of the Agenda in another format (for example in large print) please contact Sarah Lees on:

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MID DEVON DISTRICT COUNCIL

MINUTES of a **MEETING** of the **REGULATORY COMMITTEE** held on 18 December 2014 at 10.45am

Present

Councillors

Mrs F J Colthorpe, D R Coren, N V Davey,
A V G Griffiths, P H D Hare-Scott, T G Hughes,
D J Knowles, E G Luxton and P F Williams

Apologies

Councillors

R J Chesterton, M R Lee and M A Lucas

Also Present

Officers:

Sarah Lees (Member Services Officer) and Simon Newcombe
(Public Health and professional Services Manager)

1 ELECTION OF CHAIRMAN (00:44:07)

RESOLVED that Cllr T G Hughes be elected Chairman of the Committee for the municipal year 2014/15.

Cllr T G Hughes then took the Chair.

2 ELECTION OF VICE CHAIRMAN (00:45:00)

RESOLVED that Cllr D J Knowles be elected Vice Chairman of the Committee for the municipal year 2014/15.

3 PUBLIC QUESTION TIME (00:46:00)

There were no members of the public present.

4 MINUTES (00:46:30)

The Minutes of the meeting held on 10 April 2014 were approved as a correct record and **SIGNED** by the Chairman.

5 REGULATORY PERFORMANCE (00:47:00)

The Committee had before it a report * from the Head of Human Resources and Development providing the annual Regulatory performance report.

It was explained that the Council's Hackney carriage and private Hire Policy came into effect in April 2013. The main changes this brought about was to implement a stricter vehicle test, increase the test frequency to every six months once a vehicle was 3 years old and from April 2014, introduce a rolling five year age limit on new vehicles. The Council did not have a risk assessed inspection programme for taxis but it did work closely with authorised garages. They carried out vehicle tests and notified the Council immediately if a vehicle failed a test.

Discussion took place regarding:

- Another compliance day being arranged alongside the Vehicle Operator Services Agency and the Police before April 2015.
- The majority of vehicles being well maintained, only a few failed the test.
- It was still early days for the six month regime, there may be an opportunity to amend policy once more data had been gathered.
- It was the driver's responsibility to ensure a vehicle was safe to drive, not the Council.
- Since the introduction of the new Scrap Metal Dealers Act in October 2013 the revised regulatory regime had proved to be successful. It was confirmed that mobile collectors were the hardest to police but the new regulations were proving helpful.
- The Council liaised with FarmWatch and other such agencies and if notified of a metal theft or crime the Council would follow this up with a visit to the notified premises.

RESOLVED that the contents of the report be noted and that the target for the issuing of licences be amended from 95% to 97% and that the length of time to issue a license after approval be amended from three working days to five working days.

(Proposed by Cllr Mrs F J Colthorpe and seconded by Cllr D R Coren)

Note: * Report previously circulated, copy attached to signed minutes.

(The meeting ended at 11.20 am)

CHAIRMAN

REGULATORY COMMITTEE
3 September 2015

REPORT OF THE HEAD OF HUMAN RESOURCES AND DEVELOPMENT

PRIVATE HIRE / HACKNEY CARRIAGE FEES AND CHANGES FOLLOWING THE INTRODUCTION OF THE DEREGULATION ACT 2015

REASON FOR REPORT

1. To outline the amendments made by the Deregulation Act 2015 which have led to a review of current Private Hire / Hackney Carriage fees.
2. To recommend the adoption of licence fees set out in this report.

RECOMMENDATIONS

1. That the Regulatory Committee notes the changes brought about by the Deregulation Act 2015 and approves the amendments set out in this report in relation to duration of licences.
2. That the Regulatory Committee approves the fees set out in this report and they be introduced as soon as possible, in compliance with the requirements to advertise / consider objections.
3. That the Regulatory Committee agrees to remove the £5 discount currently offered when renewal applications are submitted early.
4. That if there are objections to the taxi fees when they are advertised then delegated authority be given to the Public Health and Professional Services Manager, in conjunction with the with the Chair of the Regulatory Committee, to consider the objection(s) and set a further date, not later than two months after the first specified date on which the variation will come into force, with or without modification.

RELATIONSHIP TO CORPORATE PLAN

1. None

FINANCIAL, LEGAL AND RISK ASSESSMENT IMPLICATIONS

Any financial, legal and/or risk assessment implications are set out below:

Financial	Licence fees should be set at a level to recover the cost to the Council
Legal	Various statutes empower the Council to set fees for licences and the Council must be compliant with new legislation.
Risk Assessment	To set the fees too high risks the Council being challenged in the Courts by those licensed, while to set the fees too low would mean that the Council tax payer is subsidising local businesses

CONSULTATION CARRIED OUT WITH :

1. The Council's Accountancy Team to determine the costs of the function.

1.0 INTRODUCTION

- 1.1 The Deregulation Act 2015 received Royal Assent on 26 March 2015. It contained 2 provisions that will affect taxi and private hire licensing as of 1 October 2015.

Duration of licences

- 1.2 The first provision is that hackney carriage and private hire driver's licences should be issued for 3 years and private hire operators for 5 years, unless there are reasons for not doing so.
- 1.3 This authority currently allows both drivers and operators to apply for a 1 year or 3 year licence.
- 1.4 As a result of the above, this authority will need to introduce a 5 year private hire operator's licence along with an appropriate fee. This requirement has led to the licensing department reviewing all of the fees in this area.
- 1.5 Although this duration of licence must be introduced, it is felt that not all applicants / licence holders will want to apply for either a 3 year driver's licence or a 5 year operator's licence. It is therefore recommended that we continue to give drivers and operators the option of a shorter licence, in line with the information set out in this report. This decision can always be reviewed and amended in the future.

Private hire operators sub-contracting

- 1.6 The second provision introduced by the Deregulation Act 2015 is to permit private hire operators to sub-contract journeys to other private hire operators outside of the district they are licensed in. At present, private hire operators are only permitted to sub-contract journeys to other private hire operators who are licensed in the same district.

2.0 DURATION OF LICENCES IN DETAIL

- 2.1 Section 10 of the Deregulation Act 2015 amends section 53 and 55 of the Local Government (Miscellaneous Provisions) Act 1976 and states that *hackney carriage and private hire driver's licences*:

... shall remain in force for three years or for such lesser period, specified in the licence, as the district council think appropriate in the circumstances of the case.

This same provision applies for private hire operators licences, but for a period of 5 years.

- 2.2 The Department for Transport issued Best Practice Guidance in 2010 which stated that Local Authorities may want to offer the option of an annual driver licence as it may be preferred by some applicants. This may be for a number of reasons, including potential plans to change job, business uncertainty, plans to move to a different district or because they cannot easily afford a longer length licence. In relation to operator

licences, it stated that authorities may wish to offer the option of shorter licences but that a five year licence may well be appropriate in the average case.

- 2.3 The Department for Transport has to date not issued any formal guidance on the new provisions within the Deregulation Act 2015.
- 2.4 The amendments give Council's discretion as to the duration of a licence. However, when granting a shorter one, consideration must be given to the 'circumstances of the case', in other words; there cannot be a blanket policy to issue shorter licences. Shorter licences may therefore be granted on the basis of a specific request by an applicant or because the Council has concerns in relation to a specific applicant.
- 2.5 In light of this, it is requested that the Committee approve the following principles:

Driver's licences

That where a specific request is made by a new applicant or a current licence holder for a 1 year licence, this will be granted as appropriate in the circumstances of the case. The specific request will be made on the application form and the decision to issue will be delegated to the Officer dealing with the application i.e. the Public Health and Professional Services Manager and / or Lead Licensing Officer.

Operator's licences

That where a specific request is made by a new applicant or a current licence holder for a 1 year or 3 year licence, this will be granted as appropriate in the circumstances of the case. The specific request will be made on the application form and the decision to issue will be delegated to the Officer dealing with the application i.e. the Public Health and Professional Services Manager and / or Lead Licensing Officer.

3.0 LICENSING FEES

- 3.1 The changes brought about by the Deregulation Act have necessitated a review of the licensing fees for private hire operators. Instead of undertaking this task in isolation, the licensing service has taken the opportunity to review all private hire and hackney carriage fees. The last changes to fees occurred in April 2013.
- 3.2 The review process involved drawing together information regarding the costs associated with undertaking the administrative procedures and formalities associated with all chargeable elements of the licensing regime.
- 3.3 A cost matrix was developed based on two templates available from the Institute of Licensing website. These were produced by the Wales Licensing technical Panel and Taunton Deane Borough Council. The matrix seeks to set out all of the relevant information and produce a final chargeable fee for each application. The matrix itself is a lengthy document and as such, some general points of interest are noted below:
 - It contains a breakdown of all chargeable elements of each individual application via a number of different tabs.
 - A 'base cost' tab contains a number of details, including all staff hourly rates (with on-costs), the cost of specialist materials / software and the average number of applications received. This 'base' cost element then makes up a part of each application fee charged.

- An 'administration' tab outlines the general time and costs allocated year on year to maintenance of the regime (not specific to the processing of an application as such). This includes things like general admin, updating the taxi web pages, staff training and policy development.
 - A 'monitoring compliance' tab outlines the time dealing with complaints, pro-active monitoring and joint operations with other agencies.
 - Each individual application process has its own tab which tracks the time it takes from initial enquiry to issue of that particular licence.
- 3.4 If Members of the Committee wish to see the full cost matrix please contact the licensing team who will forward it to you. Furthermore, if it is helpful, a run through can be provided at the meeting.
- 3.5 To give an approximate indication as to how the proposed fees will impact on overall hackney carriage / private hire income you can take the total number of applications received in 2014/15, apply the proposed fees and compare this to the actual income for that period. Doing this shows that the actual income was £31,769 whereas the projected income with the new fees would have been £31,002, a total reduction in income of 2.4%. This figure is approximate and does not include some of the least frequent and smaller charges but gives a good indication of the potential overall difference.
- 3.6 As with all fee setting models it is important to note that the figures need to be reviewed regularly to ensure they are current and relevant. Time monitoring activities and all costings will be reviewed on an annual basis going forward and presented to the committee.
- 3.7 The current licence fees are listed in Annex 1, along with those now being proposed and the difference between them.
- 3.8 Annexe 2 gives a comparison of the new proposed fees with some of our neighbours.
- 3.9 The Council is able to recover the cost of the function and as such it is proposed to remove the £5 discount that is currently offered for 'early' renewals. This was introduced initially to encourage applicants to submit documents in a timely manner. However, the process is the same regardless of when the renewal application is submitted and as we should be aiming for full cost recovery it is not felt necessary to continue this arrangement.

4.0 ADVERTISING REQUIREMENTS

- 4.1 Whenever it is proposed to vary vehicle and operator fees so that they exceed £25, the legislation requires that a notice is published in a local newspaper stating the proposed fees and giving a date, not less than 28 days from the date on which the notice is first published, for objections to be made. If no objections are made, or if they are made and subsequently withdrawn, the new fees come into effect on the expiration of the period in the notice.
- 4.2 A copy of the notice must also be available at the council offices for inspection at all reasonable times.
- 4.3 Where objections are made and not withdrawn, the Council must consider the objections before determining the fee level and setting a further date, not later than two months after the first specified date, on which the new fees shall come into force.

4.4 Whilst there are no formal advertising requirements for driver licences, these will nevertheless be advertised too. The advertisement will be placed in a local newspaper following the Committee's decision.

5.0 RECOMMENDATIONS

5.1 In consideration of the above, it is recommended that:

- Shorter duration licences for drivers and operators are issued on specific request and when deemed appropriate in the circumstances of the case
- Discounts for early renewals are no longer provided
- The proposed new fees set out in Annexe 1 be used for our licences as soon as possible, taking into account the requirement to advertise for 28 days and consider objections.

5.2 It is further recommended that if there are objections to the fees when they are advertised then delegated authority be given to the Public Health and Professional Services Manager, in conjunction with the Chair of the Regulatory Committee, to consider the objection(s) and set a further date, not later than two months after the first specified date on which the variation will come into force, with or without modification.

6.0 TIMESCALE

6.1 The fees set will take effect as soon as possible, in compliance with the relevant legislation.

Contact for any more information	Tom Keating (4618) Simon Newcombe (4615)
Background Papers	Various licensing legislation
File Reference	Licensing Fees/Fees/2015
Circulation of the Report	Regulatory Committee

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CURRENT FEES / PROPOSED FEES COMPARISON

<u>Drivers</u>	Current	Proposed	Difference
HC/PH driver licence – New 1 year	£93	£108	+£15
HC/PH driver licence – New 3 year	£246	£244	-£2
HC/PH driver licence – Renewal 1 year	£93	£93	£0
HC/PH driver licence - Renewal 3 year	£246	£229	-£17
DBS fee (total)	£59	£63	+£4
New driver test / interview	£20	£36	+£16
Replacement badge	£15	£10	-£5
<u>Vehicles</u>			
Hackney Carriage - New	£169	£180	+£11
Hackney Carriage - Temporary (2 months)	£40	£73	+£33
Hackney Carriage - Renewal	£169	£162	-£7
Private Hire - New	£159	£174	+£15
Private Hire - Temporary (2 months)	£40	£67	+£27
Private Hire - Renewal	£159	£162	+£3
Transfer of interest	£30	£35	+£5
Replacement vehicle plate	£25	£26	+£1
<u>Operators</u>			
Private Hire Operator licence - New 1 Year	£86	£86	£0
Private Hire Operator licence - New 3 Year	£215	£233	+£18
Private Hire Operator licence - New 5 Year	N/A	£377	N/A
Private Hire Operator licence - Renewal 1 Year	£86	£86	£0
Private Hire Operator licence - Renewal 3 Year	£215	£233	+£18
Private Hire Operator licence - Renewal 5 Year	N/A	£377	N/A

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COMPARISON AGAINST OTHER LOCAL AUTHORITIES

	Mid Devon Proposed	East Devon	South Hams	West Devon	North Devon	Torridge
Vehicle Applications						
Hackney Carriage - New	£180	£262	£228	£168	£307.25	£325
Hackney Carriage (2 month licence)	£73	N/A	N/A	N/A	N/A	N/A
Hackney Carriage - Renewal	£162	£262	£228	£168	£307.25	£325
Private Hire - New	£174	£262	£216	£157	£262.50	£255
Private Hire (2 month licence)	£67	N/A	N/A	N/A	N/A	N/A
Private Hire - Renewal	£162	£262	£216	£157	£262.50	£255
Driver Applications						
1 Year Driver – New	£108	£104	£135	£101	£57.50	£64.50
3 Year Driver – New	£244	£229	£360	£272	-	-
1 Year Driver – Renewal	£93	£104	£135	£101	£42.60	£64.50
3 Year Driver - Renewal	£229	£229	£360	£272	-	-

	Mid Devon Proposed	East Devon	South Hams	West Devon	North Devon	Torridge
Private Hire Operator Applications						
PHO – New 1 Year	£86	£130	£118	£118	£45.30 per vehicle	£49 per vehicle
PHO – New 3 Year	£233	N/A	N/A	N/A	-	-
PHO – New 5 Year	£377	£390	£470	£531	-	-
PHO – Renewal 1 Year	£86	£130	£118	£118	£45.30 per vehicle	£49 per vehicle
PHO – Renewal 3 Year	£233	N/A	N/A	N/A	-	-
PHO – Renewal 5 Year	£377	£390	£470	£531	-	-
Additional Fees						
DBS Checks (admin fee)	£63 (£19)	£67 (£23)	N/A	£50 (£6)	£59 (£15)	£55 (£11)
Transfer of Interest	£35	£80	£50	£50	£131.55	£55
Replacement Plate	£26	£46	£29	N/A	£15	£22.50
Replacement Badge	£10	N/A	N/A	£15	£10	£10
Driver Interview / Test	£36	N/A	£47	£45	-	-

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REGULATORY COMMITTEE
3 September 2015

REPORT OF THE HEAD OF HUMAN RESOURCES AND DEVELOPMENT

MOBILE HOME LICENSING

REASON FOR REPORT

1. To inform Members of the provisions of the Mobile Homes Act 2013 and to update them on the current work being carried out.

RECOMMENDATIONS

1. That Members note the statutory powers local authorities now have following the introduction of the Mobile Homes Act 2013.
2. That Members note the current work being undertaken by Officers which will culminate in a further committee meeting to discuss a potential fee policy.

RELATIONSHIP TO CORPORATE PLAN

1. None

FINANCIAL, LEGAL AND RISK ASSESSMENT IMPLICATIONS

Any financial, legal and/or risk assessment implications are set out below:

Financial	Not at this stage
Legal	The legal implications of the Act are set out in the report.
Risk Assessment	Low

1.0 INTRODUCTION

- 1.1 The Council has a statutory duty under the Caravan Sites and Control of Development Act 1960 to licence caravan sites. This legislation also covers Park and Mobile Homes.
- 1.2 A review by Parliament's Communities and Local Government Select Committee in 2012 found the licensing regime to be outdated. It also found that it failed to provide local authorities with the necessary tools and resources to effectively licence and monitor sites.
- 1.3 The Mobile Homes Act 2013 has been introduced to enable local authorities to monitor residential park homes and caravan sites more effectively to ensure that residents' health and safety is better protected.
- 1.4 The changes apply to 'relevant protected sites' and these are defined as '*any land to be used as a Caravan Site other than one where a licence is:*
 - *Granted for holiday use only*
 - *In any other way subject to conditions which restrict the usage of the site for the stationing of caravans for human habitation at certain times of the year (such as planning conditions)*'.
- 1.5 Relevant protected sites are typically known as residential parks, mobile home parks, Gypsy Roma and Traveller Sites and so on.

2.0 THE MOBILE HOMES ACT 2013

- 2.1 The Mobile Homes Act received Royal Assent on 26 March 2013 and amends the Caravan Sites and Control of Development Act 1960 by introducing a number of new provisions in relation to local authority powers (amongst other matters). These include powers to:
 - Charge fees for new residential site licences, transfers and variations
 - Charge an annual fee to existing residential site licence holders
 - Refuse a licence or refuse to transfer a licence
 - Serve compliance notices and undertake emergency works together with the power to recover expenses and costs relating to works in default
 - Have a role in the new system for making site rules and for site rules to be deposited with the local authority.
- 2.2 The Mobile Homes Act also introduced new laws to address general malpractice across the mobile home sector, including site operators blocking sales and ensuring site rules are agreed with park home residents. Many of these new provisions are now in force, but do not affect local authority powers or duties.

3.0 CURRENT POSITION

- 3.1 Our current records show that there are 26 'relevant protected sites' in the district. The majority of these sites (19) are relatively small (i.e. contain less than 3 pitches) and the licences are historic, dating back a number of years.
- 3.2 With this in mind the Public Health Service are looking to update these records to ensure they are accurate. This includes making visits to assess sites and verify the

number of pitches. The work verifying the accuracy of our current records is essential in order to ensure well informed decisions can be made at a later stage.

- 3.3 The main focus of the upcoming work will be to try and decide whether or not fees should be introduced and if they should, whether they should apply to all 'relevant protected sites' in the district.
- 3.4 The Council has the discretion to exempt certain categories of site from payment, but will have to justify any such decisions e.g. based on potential risk or cost. The Government has produced some guidance on this and it is copied below:

Whilst adopting a fees policy a local authority can decide to exempt certain categories of sites from payment. A local authority must however be able to justify any such decisions - which will usually be due to risk and, or cost.

Any exemption must be rational, objective and consistent. The exemptions must be set out in the fee policy. Site categories which are exempted can subsequently be brought within the charging structure by a change to the fee policy.

Importantly too, a local authority should not charge higher fees for non-exempted sites to cover its costs in relation to licensing functions for those sites that are exempted from payment.

A local authority may consider exempting the following types of sites:

- *Certain sites based on a minimum size – this may be single unit sites or sites of a size less than a given figure e.g. 3 or 5. The rationale for exempting such sites being that they are low risk, they tend to be family run sites which are not run as a business, they are rarely, if ever, the subject of complaints and the cost of inspection is outweighed by the cost of administering any charges.*
- *Sites that are not run as a business, again justified as above – this would include family run sites and typical small Gypsy Roma and Traveller sites. However, consideration needs to be given as to how you would quantify/ define 'family site' and the evidence required to show that a site was not a family run site and was instead a business when challenged otherwise. On balance this is considered a problematic category and is not recommended.*
- *Gypsy Roma and Traveller (GRT) sites – some local authorities currently have little involvement with these sites and some do not even impose conditions. There may be a presumption that administering and recovering charges on these sites would be problematic. Even if no fees are charged the local authority still has a duty to license such sites and has powers of enforcement. There may be an expectation that enforcement action will be taken - in particular in respect of fire safety where the enforcing responsibility usually rests with the local authority and not the fire service under the Fire Safety Order (whereas on traditional residential park home sites the Order is relevant for common parts). Local authorities may consider the most sensible option to assess GRT sites against the same criteria as the traditional sites. So all sites of a minimum size (say less than 5) are exempt from charging, whilst all sites, including GRT sites, above a certain size are included.*

In considering any fees policy, a local authority has full scope to consider the particular types and sizes of sites and issues on its district, so it can frame its policy accordingly, including exemptions to suit. It can also exempt by way of type of fee payable (i.e. application or annual fees) generally or specifically in relation to categories of sites.

4.0 FUTURE DECISIONS

4.1 A further report will be brought to this committee which outlines the current position in greater detail (i.e. number of confirmed sites / general standards of those sites) and seeks to address the following points:

- Whether or not this authority should charge for the licensing functions under the Act
- Whether or not exemptions should apply to certain sites
- Potential proposed fees (if applicable)

Contact for any more information	Tom Keating (01884) 244618 Lead Licensing Officer
Background Papers	Caravan Sites & Control of Development Act 1960 / Mobile Homes Act 2013
File Reference	Licensing/Caravans/Mobile Homes
Circulation of the Report	Regulatory Committee