Business Case

Authors	
Authors	Keith Amos, David Morgan & Isobel Bourke-Bennett
General Information	
Project Name	Denbighshire Caravan Site Strategy for Managing Residential Occupancy
Project Reference	PR003066
Brief Description	To ensure Denbighshire's holiday caravan sites are operating in accordance with their relevant statutory Council consents. To ensure a clear strategy is in place to address the unauthorised residential occupation of holiday caravans including regularisation of established sites and the effective enforcement of others.
Programme	Service: Business Improvement and Modernisation
Start Date	30/03/2015
End Date	24/12/2015
Which area(s) are impacted by the project?	Denbighshire Rhyl Prestatyn Elwy Denbigh Ruthin Dee Valley
Project Scale	
Decision Matrix	
Project Scale	
What is the total cost of the project?	Up to £50K OR Up to £150K 0 (Construction)

Decision Matrix		
Project Scale		
What is the total cost of the project?	Up to £50K OR Up to £150K (Construction)	0
How long will it take to develop and implement the project?	3 to 12 months	1
Which stakeholders are involved?	Stakeholder Opposition	2
Has Denbighshire done this sort of project before?	Once or Twice	1
What is the reputational risk to Denbighshire if we make significant mistakes in project delivery or the project fails?	High	2
What is the financial risk to Denbighshire if we make significant mistakes in project delivery or the project fails?	Medium	1
Total		7.0
Total		

Project Members	
Alan Smith	
Project Role	Project Executive

Medium

Project Pole	Project Manager	
Isobel Bourke-Bennett		
	8.02	_

Project Role	Project Manager	
Responsibilities	subject to agreement	

David Morgan		
Project Role	Project Support	

Project Role	Project Support	
Paul Mead		

Project Role	Service Area Business Lead	
Responsibilities	Planning and Public Protection - Enforcement	

Executive Summary

Project Scale

Project Members

Highlight the key points in the Business Case, which should include benefits and the return on investment (ROI)

The aim of the project is to ensure Denbighshire's holiday caravan sites are operating in accordance with their relevant statutory Council consents. To ensure a clear strategy is in place to address the unauthorised residential occupation of holiday caravans including regularisation of established sites and the effective enforcement of others.

This project will help develop a better understanding as to the current situation with regard to the residential occupation of holiday caravans in the county which will enable informed decisions to be made in relation to the most appropriate strategy for the county. The development of a corporate strategy will establish a more coherent approach across the council to tackling the residential occupation of holiday caravans. Developing a system which will continue to gather information from relevant services when required will enable us to continue monitoring the situation. Additionally, through the compilation of a comprehensive caravan address list (including site addresses and individual caravan site addresses) then reporting from this 'system' will become more accurate over time.

ROI - This project should identify the true costs currently being incurred by the authority due to the illegal use of holiday caravans and how much of an increase in income we could potentially gain from council tax and the RSG due to an increase in the official population in the county. Furthermore, through having a comprehensive list of holiday caravan sites, which is accessible to all services, then this will enable services, at the point of customer contact, to identify holiday caravan occupants and establish the appropriate action, i.e. whether or not the customer is eligible for the service and whether or not planning services should be informed of the service request.

Explain the reasons for undertaking the project and how the project will enable the achievement of corporate strategies and objectives

The project is required to ensure that legislation is adhered to across Denbighshire Holiday parks and appropriate enforcement measures are levied. In addition, permanent residences suggest that there is a significant loss of revenue to the council, and more resources being utilised, such as education, social services and housing.

The corporate priorities which relate to this project are as follows:

- Vulnerable people are protected and are able to live as independently as possible research has shown that caravans are more typically occupied by those more vulnerable within the population e.g. those older in age and/or poor in health. Holiday caravans are typically not of a high enough quality for year round occupation and as such this group may be at risk of worsening health due to their choice of accommodation.
- Modernising the council to deliver efficiencies and improve service for our customers lack of action may be proving costly to the council as a whole through reduced income from council tax and RSG

### **Business Options**

### **Brief Description**

Build on the preliminary research but extend its scope to create a process which can be used to create a comprehensive snap-shot of relevant information on a periodic basis (e.g. annually, quarterly etc.)

This relevant information will consist of council service being delivered to caravan site addresses with further work identifying (where possible)

- Caravan being used contrary to licence or planning consents.
- Incidences where several services are being delivered to the same caravan address.
- 3. Council tax payments and potential council tax liabilities relating to caravans being used as permanent residences.
- The likely impact for residents and for services if services were discontinued at particular caravan site
- Options for changing the licence arrangements for a site and the implications of doing so.

Costs Comparison

Time Comparison

Quality Comparison

Benefits Comparison

Costs less

Is quicker to deliver

Is the same quality

Worsens benefits

### Brief Description

Establish a tool and work-flow which allows for continuous 'live' monitoring of service delivery to caravan site addresses allowing for regular reporting and ad hoc requests for information on:

- Caravan being used contrary to licence or planning consents.
- Incidences where several services are being delivered to the same caravan address.
- Council tax payments and potential council tax liabilities relating to caravans being used as permanent residences.
- The likely impact for residents and for services if services were discontinued at particular caravan site locations
- 5. Options for changing the licence arrangements for a site and the implications of doing so.

Costs Comparison Time Comparison

Costs more

Quality Comparison

Is the same quality

Benefits Comparison

Improves benefits

Takes longer to deliver

Brief Description

Costs Comparison

Time Comparison Quality Comparison Utilise the existing data from the previously analysed 5 sites to develop a corporate caravan strategy

Costs less

Is quicker to deliver

Is a lower quality

Benefits Comparison Worsens benefits

What is the main reason this option has not been selected

It has been established, via comments from CET and Community Scrutiny Committee, that the information gathered from the 5 sites is insufficient in order to establish and overarching corporate strategy

**Brief Description** 

Gather information on all individual caravan site addresses (including plot numbers and internal site street names if applicable) and input this infromation into the Gazetteer.

### Project Scope

Within Scope

The scope of the project will include:

Data analysis

- . Research, evidence and data analysis to enable the development of a strategy for the council to manage the 'permanent' occupancy of caravans on holiday parks.
- Data analysis to allow the efficient implementation of the strategy in operational services

Corporate strategy

- Develop Corporate strategy for managing the residential occupation of holiday caravan sites in the County
- Develop a stakeholder implementation plan with DCC Services

Outside Scope

The project will be restricted to caravans on holiday sites and will therefore not include chalets, tents, single caravans situated in the gardens of private dwellings or other transient abodes.

Making decisions on the appropriate action in individual cases at the service level will also be outside the scope of this project.

Communications

Communication Plan

No

Communications A communication plan will be developed due to the wide range of stakeholders involved in the project.

The following types of stakeholders will be involved:

Residents of caravans Caravan site owners

Service stakeholders e.g. licensing, education, socail services etc

Data system owners

ICT

Councillors

### nterdependencies

interdependencies

00001 I-share

Title

I-share

00002 Digital Choice - to develop a business plan outlining how Digital Choice can be delivered

Title Digital Choice - to develop a business plan outlining how Digital Choice can be delivered

00003 Investigation of Information/Data Management Solution

Title Investigation of Information/Data Management Solution

Dependent Projects

Project Code PPP307a

Project Name Better regulation of caravan sites

Cashable Benefits

Cashable Benefits

Title

BEN.3066.01 - RSG

Benefit Number BEN.3066.01

RSG

Description

We hope that the identification of residents not included in the census with enable the council to argue a higher population than is currently taken into account during the RSG settlement and that this argument will

lead to a higher settlement in the future.

Benefit Owner Not yet known

Status None

Department Claiming the Benefit Corporate Programme Office

Benefit Term Recurring

Revenue or Capital?

Confidence Medium

Disbenefit If the number of individuals contributing to council tax increases then this may result in a decrease in

business rates which could subsequently result in a reduction in the RSG (DCC is currently a net gainer in

relation to business rates - collecting £20milion but receiving £29million in settlement)

Expected Delivery Date 31/12/2015

Responsible For Delivery David Morgan

DEN 2000 02 C-----

BEN.3066.02 - Council Ta

Benefit Number BEN.3066.02

Title Council Tax

Description Increase in income via Council Tax due to identifying additional individuals who were previously not captured

in the population.

Disbenefit If the number of individuals contibuting to council tax increases then this may result in a decrease in

business rates which could subsequently result in a reduction in the RSG.

Responsible For Delivery David Morgan

Benefit Number BEN.3066.03

Title Reduced Service Provision

Description Potentially reduce the number of services being provided to those who are not eligible.

Disbenefit Potential implications of removing services from individuals who have been receiving them for extended

periods (including dealing with increased numbers of complaints)

Responsible For Delivery David Morgan

## Non Cashable Benefits

BEN.3066.06 Benefit Number

Title Accurate population statistics

Description Establish a better understanding of the population levels within the county

Responsible For Delivery David Morgan

BEN.3066.07 Benefit Number

Title Improved service planning

By having a better understanding of the number of people currently residing within caravans in the county, Description

services will be better able to plan for the future.

Responsible For Delivery David Morgan

Benefit Number BEN.3066.08

Title Caravan Site Safety

Through the production of the comprehensive caravan site list then licensing will be more aware of all of the Description caravan sites in the county. This will enable them to ensure that all sites are allocated with the required

licence (where applicable) and are meeting their health and safety requirements.

David Morgan

# Responsible For Delivery

End Date Active

Status

Active

Percentage Complete

Milestone ID 00001

Milestone Title Site Locations and Allowances

Develop a map showing the location of all sites and their allowances (planning and licencing allowances). A document Description

should also be attached which details the individual plot addresses on each site.

30/06/2015

Yes

Yes

0

On Target

Percentage Complete 50

00007 Milestone ID

Milestone Title Decide on data processing system

End Date

17/07/2015

Milestone ID 00008

**Business Case** 

Milestone ID	00002
Milestone Title	Data Collection and Processing
Description	Develop a system to gather and sort information, based on address data, from relevant Council services
End Date	16/10/2015
Active	Yes
Percentage Complete	0

Milestone ID	00003
Milestone Title	Data Analysis and Mapping
Description	Analyse and map information gathered on service use by all Denbighshire holiday caravan site residents from each relevant service
End Date	13/11/2015
Active	Yes
Percentage Complete	0

Milestone ID	00004
Milestone Title	Summary Document
Description	Produce a document summarising all findings and providing suggestions for a corporate strategy for addressing the residential use of holiday caravan sites in the County
End Date	30/11/2015
Active	Yes
Percentage Complete	0

Milestone ID	00006
Milestone Title	Strategy Document
End Date	31/12/2015
Active	Yes
Percentage Complete	0

Milestone ID	00009
Milestone Title	Construction of a comprehensive holiday caravan site address list
Description	Construction of a fully comprehensive list of holiday caravan site addressess in the county including individual holiday caravan addresses.
End Date	31/12/2015
Active	Yes
Percentage Complete	0

Milestone ID	00010			
Milestone Title	Development of a Regulatory Procedure and Implementation Plan			

Milestone ID 00005

Milestone Title Service Level Implementation Support

Description Provide support to relevant services with regard to implementing the corporate strategy within the service

context

31/12/2015

Yes

0

**End Date** 31/01/2016

Yes Active

Percentage Complete 0

## Costs

**Business Case** 

Description

End Date

Percentage Complete

Active

## 2015/16

Developing and maintaining a system/database for the initial gathering of service data and later use for continued monitoring and reporting

18.659 Project Researcher

Staff time required to process data and produce report at required time intervals (either at the corporate or service level)

Staff time to support and advise services as to how to implement the new corporate strategy on caravan use in the county

Total 18.659

## 2015/16

Category ICT Infrastructure and Hardware

Title Developing and maintaining a system/database for the initial gathering of service data and later use for continued monitoring and reporting

Category Internal Staff Costs

Title Project Researcher

Forecast (£000s) 18.659

Internal Staff Costs Category

Title Staff time required to process data and produce report at required time intervals (either at the corporate or

service level)

Category Internal Staff Costs

Title Staff time to support and advise services as to how to implement the new corporate strategy on caravan

use in the county

### Risks

### Rick

### 00001 Homelessness

Description

Mitigating Action

Risk

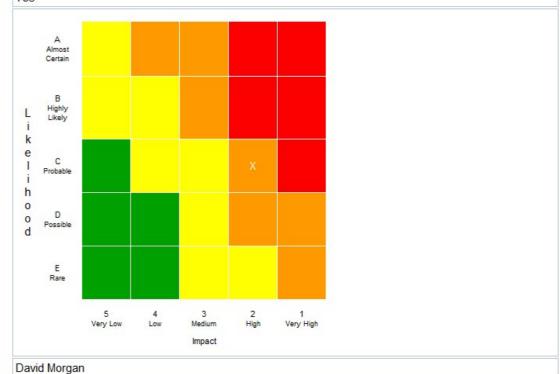
Active Likelihood & Impact As a result of this work there is the potential that a number of individuals could be evicted from their caravans which would result in them becoming unintentionally homeless and the local authority may therefore have a statutory responsibility to rehome.

The eviction process would also place a huge emotional tole on the residents concerned.

Before any regulatory action is taken as a result of the information gathered, discussions will be undertaken with housing services in order to establish an action plan for dealing with a potential increase in housing demand.

Organisational/Management/Human Factors

Yes



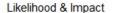
Owners

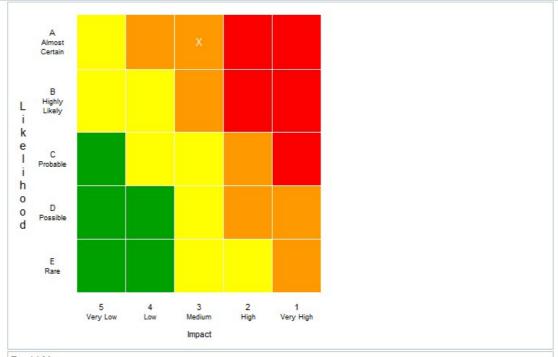
### 00002 Data reliability

Description

Due to the number of different services from which the data will be captured along with the variety of ways in which address data is entered (often manually) into these systems, the reliability of the collected data may be bought into question. We may over or under estimate numbers living on sites due to factors such as properties sharing the same postcode, people using their individual caravan number and site street name rather than the caravan site name or the mis-spelling of addresses etc.

Active





Owners

David Morgan

### 00003 Access to data

Description

Data must be gathered from a number of individual services who each use a variety of different legacy systems. In order to access the information we require service to either provide us with access to these systems or provide us with reports of relevant data. If services are not compliant then this will limit the range of data we are able to collect and analyse.

Caravan site owners will also be required to provide us with information on their internal street names and plot numbering methods in order to enable the construction of a comprehensive site address list. If site owners do not have this infromation or are not willing to provide it then this could have a significant impact on this element of the project.

Active

Likelihood & Impact



Owners

David Morgan

### 00004 Impact on unidentified services

## Description

As the project has developed it has been established that a wide range of services are either directly or indirectly affected by the use of holiday caravans for residential purposes. As such there is a possibility that services that are yet to be identified could be adversely affected by enforcement action or a corporate strategy within which they have not been considered.

Active

Likelihood & Impact



Owners

David Morgan

### 00005 Impact on caravan owners

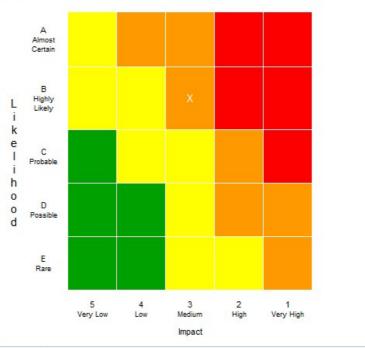
Description

Active

Likelihood & Impact

Regardless of the Corporate strategy undertaken it is likely that a significant amount of disruption will be caused to current caravan owners on holiday caravan sites in the county.

Yes



Owners

David Morgan

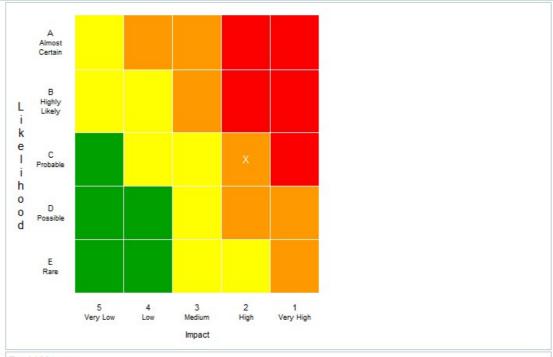
### 00006 Impact on site owners

Description

Dependent on the startegy undertaken there could be potentially major impacts upon site owners e.g. in extreme cases some sites may be forced to close due to non-compliance, others may close due to the costs of functioning within the allowances of their licencing and planning permissions being far higher than the costs of functioning illegally. Businesses may also lose revenue due to caravan owners relocating their caravans to sites outside of the county where the rules may be less stringent.

Active

Likelihood & Impact



Owners

David Morgan

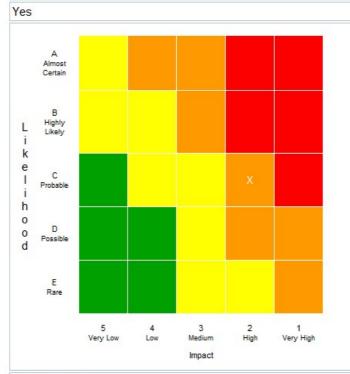
### 00007 Loss of Resource

Description

Active

Likelihood & Impact

Project is currently being managed by a temporary member of staff on a fixed term contract until December 2015 and as such there is the potential that this resource could be lost during the lifetime of the project and that other staff will not have the capacity to take over this role.



Owners

David Morgan

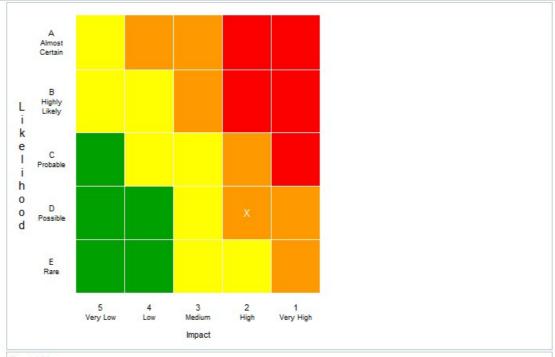
### 00008 Underestimated impact upon known services

Description

There is the potential that the impact of any action on key services may be underestimated and that the true impact would not be identified until key decissions have already been made.

Active

Likelihood & Impact



Owners

David Morgan

00009 Impact on reputation of organisation

Description

The press attention for this project has already been significant and as such if handled incorrectly or irresponsibly there could be detrimental impacts on the reputation of the Council as a whole. Equally if the project is handled effectively, our methodology for tackling this issue could be used as best practice by other organisations thereby boosting our reputation as an authority.

Active

Likelihood & Impact



Owners

00010 Tourism/Local Economy

Description

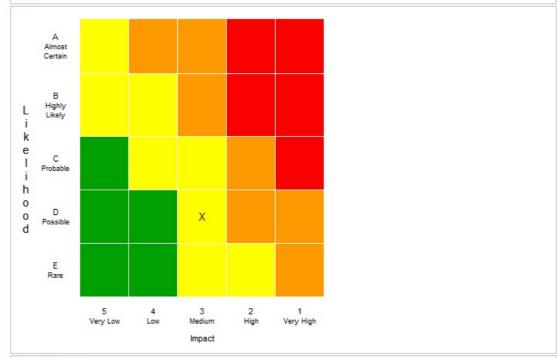
If the decision was made to take enforcement action against local sites then this may mean that more accommodation would become available to genuine tourists thus bringing more revenue to the area. However, it is possible that if the chosen enforcement action is seen as disproportionate then this may deter potential visitors and current visitors from utilising local sites and resources. In fact, if the appropriate enforcement action for some sites is perceived to be the closure of the site, then this may cause a significant reduction in the tourist accommodation available.

However, if no enforcement action was taken there is the potential for the number of holiday caravans being illegally residentially occupied to increase, causing an unofficial reduction in the tourist accommodation offer available in the County and consequently causing a loss in revenue. Another option to consider would be the establishing the lawful use or regularisation of sites (i.e. a proportion of a site is granted planning permission to become residential). Although doing so would mean that we would have greater control over the number of people residentially living on sites, along with a potentially more accurate account of the numbers of people living on sites (which could then be fed into census statistics and potentially result in gaining more funding), there would also be an official reduction in Denbighshire's holiday accommodation offer.

Active

Likelihood & Impact





Owners

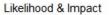
David Morgan

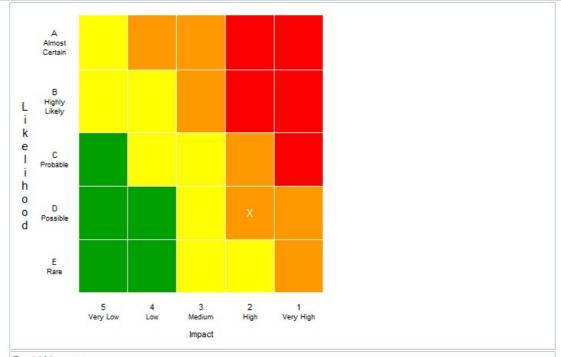
00011 Social Services

Description

Studies have shown that holiday caravans are commonly occupied by those from the more vulnerable section of society. Additionally, those living in a caravan have commonly done so for an extended number of years and thus regard it as their home. As such the process of having to leave their home may be extremely stressful and result in a greater reliance on social services.

Active





Owners

David Morgan

### 00012 Individual Holiday Caravan data on the Gazettee

### Description

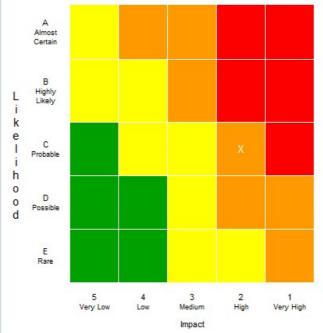
We may face some difficulties while attempting to imput individual caravan address data into the Gazetteer system. Issues include:

- Needing to imput 2 street names due to having and internal street name within the caravan site in addition to the street name of the overall site
- Throught the inputting of individual holiday caravan addresses into the Gazetteer each property will be
  allocated a UPRN which then makes them able to recieve post to that address. As such we may face
  issues with holiday caravan site owners who may see a significant increase in the amount of post
  being delivered to the site.

Active

Likelihood & Impact

Yes



Owners

David Morgan

## Project Impact

HR Impact

Does the project impact on DCC employees or other workers?

	20002010 Salaran on Sa
If yes, have you contacted HR Direct?	No
Will the project impact on staffing levels?	No
Will the project impact on the skill mix?	No
Will the project affect multiple sites?	Yes
Have you collected information for Equality Impact Assessment purposes?	In Progress
ICT Impact	
Is there an ICT element within your project?	Yes
Is it a new system?	Yes
An upgrade to an existing system?	No
A replacement system?	No
An amendment to an existing system?	Yes
Are links to other systems required?	Yes
Does the work require a move or a new build?	No
Is telephony required?	No
Are new PCs/laptops/mobile devices required?	No
Property / Design and Construction Impact	
Does the project involve any alterations / changes to an Asset (DCC or Landlords)?	No
Will there be any property related works/requirements included within the project?	No
Procurement Impact	
Are you planning to procure this project via tenders or quotes?	No
Has a Sustainability Risk Assessment (SRA) been undertaken	No
Will be Community Benefits be delivered as part of this project?	No
Will there be an Exit Strategy developed as part of this project?	No

### Project Context

### **EQUALITIES**

- 1. What type of proposal/decision is being assessed?
- 2. What is the purpose of this proposal / decision, and what change (to staff or the community) will occur as a result of its implementation?
- 3. Does this proposal / decision require an equality impact assessment?
- Please provide a summary of the steps taken, and the information used, to carry out this assessment, including any engagement undertaken.
- 5. Will this proposal / decision have a positive impact on any of the protected characteristics? (Please summarise any likely positive impact and identify which protected characteristics will benefit)

### A new or revised policy

The purpose of this activity is to conduct a review of the occupancy of caravans across Holiday sites within Denbighshire and to identify a strategy for implementation across all services within the Council.

### Yes

Research has been undertaken within Planning and Public Protection which has identified the wider problem on the impact to more services across the council. From early indications, there are a number of protected characteristics impacted which will be considered throughout the review and any proposed implementations will capture the requirements of people with protected characteristics.

### Age & Disability

Previous studies have shown that those living in caravans tend to be from the more vulnerable sectors of society (including those older in age, with higher social care needs). As such if the decision is made to allow some sites to become residential and therefore that the quality of accommodation is improved (to allow for year long residency) or that individuals are re-housed in more appropriate accommodation then this cohort will significantly benefit from the project.

Race - Gypsy & Travellers

For gypsies and travellers it may be that through esablishing clarity in terms of the eligibility of caravan dwellers to council services that they gain access to additional services that they were previously unaware of.

<ol><li>Will this proposal / decision have a</li></ol>	
disproportionate negaitve impact on any of	f
the protected characteristics? (Please	
summarise any disproportionate negative	
impact and identify which protected	
characteristics will benefit)	

### Age & Disability

Conversely, if enforcement and eviction from sites is deemed the most appropriate response, and a housing provision has not been allocated, then this cohort may be at a significant risk of becoming homeless and therefore be negatively impacted.

Race - Gypsy & Travellers

The project may negatively impact upon gypsy and travellers as if the eligibility criteria for some services were changed or enforced then they may no longer be able to access these services.

7. Has the proposal / decision been amended to eliminate or reduce any potential disproportionate negative impact? No

If no, please explain why. If yes, please provide detail

Will be addressed once the final equality impact assessment has been completed.

8. Have you identified any further actions to address and/or monitor any potential negative impact?

No

If yes, please complete the 'Actions' control below. If no, please explain

Will be addressed once the final equality impact assessment has been completed.

BIODIVERSITY

Does the project have potential to impact negatively on biodiversity?

No

Will this project impact on any protected or priority species?

No

Will this project impact on any protected sites or priority habitats?

No

CARBON

### Impact Questions

### Carbon - What is the expected impact of this project in terms of:

Energy use for Denbighshire County Council buildings (electricity, gas, oil, LPG)?

Neutral

Mileage of Denbighshire fleet vehicles?

Neutral

Tonnes of business waste produced by Denbighshire County Council?

Neutral

Mileage for business travel by employees using their personal vehicles?

Not Known

### PRIVACY

Does this project/activity involve dealing with the personal details of individuals?

Yes

If yes please comment

At the time of preparing this Project Brief (20150408) it is unknown as to the level of information that will be utilised during this project - information will be gathered from existing legacy systems, but only name and address (and possibly age) information is likely required. As the project progresses, further information may be required at which point will be detailed in the Privacy Impact Assessment.

### Approvals

Approvals

Alan Smith