

Diversity impact assessment

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| TITLE <i>Name/description of the issue being assessed</i> | Mobile Homes Fees policy |
| DATE <i>Date the DIA is completed</i> | 23.04.2026 |
| LEAD OFFICER <i>Name and title of person responsible for carrying out the DIA.</i> | Paul Salter, Private Sector Housing & Adaptations Manager |

- 1 Summary description of the proposed change**
- *What is the change to policy/service/new project that is being proposed?*
 - *How does it compare with the current situation?*

The Mobile Home Fees Policy has been developed to:

- To enable the Council to recover its operating costs, whilst engaged in a statutory duty to inspect and license Relevant Protected sites within the Medway district,
- To implement and administer a Fit and Proper test and promote competent levels of park management and personal,
- To implement and administer a Medway district Fit and Proper Person Register,
- To implement and administer a Medway district Park Rules Register,

The policy seeks to implement the Mobile Homes Act 2013. The aim of the policy is to strengthen the regulatory framework for the management of the mobile homes sector by imposing obligations on site license holders.

This policy has been developed to include the following legislative controls;

- The Caravan Sites and Control of Development Act 1960
- Caravan Act 1968
- The Mobile Homes Act 1983
- The Regulatory Reform (Fire Safety) Orders 2005
- Model Standards 2008
- The Mobile Homes Act 2013
- Mobile Homes (Park Rules) (England) Regulations 2014
- Medway Council Housing Strategy 2018-2022
- The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020

Department for Communities and Local Government guidance

- The Mobile Homes Act 2013 A Guide for Local Authorities on setting site licensing fees
- The Mobile Homes Act 2013 - A Guide for Local Authorities on setting site licence fees – Summary

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2 Summary of evidence used to support this assessment

- *Eg: Feedback from consultation, performance information, service user records etc.*
- *Eg: Comparison of service user profile with Medway Community Profile*

A period of consultation with Site licence holders, Park home-owners, Qualifying Residents Associations and Mobile home site owners has not been conducted as this not required under the Mobile Home Act 2013 in order to enact this policy.

Nationally, mobile homes continue to form a viable source of affordable housing, favoured (not exclusively) by households of limited income streams. Site residents are predominately 50 years plus, with many of Medway parks being developed and requesting this age demograph.

There are 5 Relevant Protected sites consisting of 612 units within the Medway district.

Planning Permission for a change of use is required prior to development of a mobile home site.

It is unlawful to operate without obtaining a licence from the Licencing Authority, who may implement Licence Conditions to control development and ensure fire safety.

There are 5 registered site licence holders.

There are 0 Qualifying Residents Associations.

The majority of Medway's mobile homes are of mixed tenure - owned and privately rented.

These are concentrated in the more Peninsular Wards region of Medway namely Hoo and Allhallows.

Consultation with the Kent Fire and Rescue Services is ongoing.

Consultation with Medway's Planning Directorate is ongoing.

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3 What is the likely impact of the proposed change?

Is it likely to :

- Adversely impact on one or more of the protected characteristic groups?
- Advance equality of opportunity for one or more of the protected characteristic groups?
- Foster good relations between people who share a protected characteristic and those who don't? (insert ✓ in one or more boxes)

| Protected characteristic groups | Adverse impact | Advance equality | Foster good relations |
|---------------------------------|----------------|------------------|-----------------------|
| Age | | ✓ | ✓ |
| Disability | | ✓ | |
| Gender reassignment | | ✓ | |
| Marriage/civil partnership | | ✓ | ✓ |
| Pregnancy/maternity | | ✓ | |
| Ethnicity | | ✓ | |
| Religion/belief | | ✓ | |
| Sex | | ✓ | |
| Sexual orientation | | ✓ | |
| Socio-economic disadvantage | | ✓ | ✓ |

4 Summary of the likely impacts

- Who will be affected?
- How will they be affected?

It has not been identified that this policy will have a negative impact on any protected characteristic.

The policy will be applied equally to all Medway residents regardless of any defining characteristics.

Some groups who are unable to read written English can initially be disadvantaged, if material is not available in the appropriate format.

The council can make arrangement for an interpreter for interpretation should this be needed.

The following positive impact have been identified.

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Age

The mobile home sector offers easy access and is being increasingly favoured by the semi-retired and retired. This policy will help improve condition of the properties for those ages.

Ethnicity

The imposition of a framework for good management, the provision of a good basic standard of amenities and the subsequent remedying of actionable hazards on licenced mobile home has a positive impact across all ethnic groups.

Socio-economic disadvantage

Many households in the mobile home sector are unable to access 'bricks and mortar' home ownership for financial reasons. Further, many residents have downsized due to current economic pressures, changing lifestyle, mobility, or changing relationships status. Earlier examples of mobile homes are known to suffer from a lack of thermal insulation which can lead to fuel poverty.

Physical and financial restrictions, may result in a lack of routine maintenance, which can often lead to residents living in substandard accommodation, negatively impacting upon their health, and social economic well-being. The policy will ensure equal living standards are routinely monitored (annually).

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

- *Are there alternative providers?*
- *What alternative ways can the Council provide the service?*
- *Can demand for services be managed differently?*

Ethnicity

Any cultural issues will be considered before enforcing standards. The policy and associated consultation documentation should be made available in a variety of languages and formats (if required).

The policy should lead to a better quality of mobile homes and greater community stability in the Medway, for groups who are unable to access social housing or homeownership therefore it can assist with community cohesion and tackle exclusion.

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6 Action plan

- *Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence*

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| To carry out the consultation and ensure relevant feedback is included in this DIA | Private Sector Housing & Adaptation s Manager | Ongoing |
| Monitoring of licencing activity on a regular basis | Private Sector Housing & Adaptation s Manager | On going |
| Monitoring of complaints with regard to mobile homes licencing. | Private Sector Housing & Adaptation s Manager | On going |

7 The recommendation by the lead officer should be stated below. This may be:

- *to proceed with the change, implementing action plan if appropriate*
- *consider alternatives*
- *gather further evidence*

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

To proceed at the earliest juncture.

8 Authorisation

The authorising officer is consenting that:

- *the recommendation can be implemented*
- *sufficient evidence has been obtained and appropriate mitigation is planned*
- *the Action Plan will be incorporated into service plan and monitored*

Authorising Officer

Becs Wilcox

Date

28.04.2026

Contact your Performance and Intelligence hub for advice on completing this assessment

RCC: 01634 332443 email: annamarie.lawrence@medway.gov.uk

C&A: (Children's Social Care) contact your normal P&I contact

C&A (all other areas): 01634 331481 email: paddy.cahill@medway.gov.uk

BSD: 01634 332472/331490 email: corppei@medway.gov.uk

PH: 01634 332636 email: david.whiting@medway.gov.uk

Send completed assessment to the Corporate Performance & Intelligence Hub (CPI) for web publication (corppei@medway.gov.uk)