

Scrutiny and Policy Panel Report

To explore the issues surrounding caravan licensing and enforcement

Introduction

It has been a pleasure to chair this really interesting Scrutiny Group and I have learnt a great deal. My grateful thanks on behalf of the scrutiny group, comprising Jill Makinson-Sanders (Chairman), Terry Taylor, Sandra Harrison, Sid Dennis, Graham Cullen, Neil Jones and Danny Brookes, go to all our contributors whose evidence has been very far reaching, to caravan enforcement officers Jo Parker and to Laura Gayle for their invaluable support and guidance and of course to Rebecca James who very efficiently keeps us all on the straight and narrow in her usual very patient way!

This year marks the 70th anniversary of the 1953 East Coast Floods which took many innocent lives along our coastline. Over these last 70 years much has changed, not least the huge explosion of caravan sites until today when we have approximately 38,000 caravans, the largest concentration of caravans in the whole of Western Europe. We now have a tourism industry which brings hundreds of millions' pounds income to the area annually and creates thousands of jobs, albeit many of them seasonal. We are proud of our beautiful long sandy beaches and our tourism offer and as a council we must work hard to ensure this continues into the future.

This is the dilemma which needs to be addressed - how we ensure safety for our holidaymakers, and our residents too, whilst promoting the growth agenda. Safety must be paramount, otherwise we could see our lucrative holiday industry evaporate.

Whilst weather forecasting has improved considerably over the decades, we must heed the warning of the Environment Agency via our Lincolnshire Fire Chief that another flood is not an "if" but a "when." Our drier winters as a result of global warming amplify this situation, flood waters cannot soak down through the soil and would spread greater distances, causing more havoc.

Our evidence shows that without a properly funded Caravan Enforcement Team we have no idea whatsoever how many people have been staying unlawfully on our caravan sites who in the event of a flood would be at high risk of losing their lives due to their invisibility. To protect both our visitors and our residents we must get to grips with managing better what could be a very real threat to life. Councillors must make it a priority to ensure this situation is not allowed to continue. The Lincolnshire Fire Brigade cannot save lives if they have no idea where they need to be.

The government is working on a mobile phone system which alerts the population to threats to life. But as the Chief Fire Officer points out there will always be some people who do not take any notice, others who are disabled who need help and others who decide to wait and see before they take action!

The medical expert Professor Gussy, from Lincoln University, has evidence that during the pandemic there could have been as many as 6,600 people living unlawfully on caravan

sites throughout the district. He is a world authority on the provision of healthcare in rural areas and his evidence should raise the alarm bells on a number of fronts. His research team has evidence that a large number of residents living in caravans, often caravans which are not up to present day housing standards, are already suffering poor health. His team's research shows this section of the community, which are patchily registered with local health providers, presents late with symptoms so the outcomes are poorer, which in turn costs the NHS more money to cope with. The ripple effect of this ends up affecting our permanent residents who are frustrated by trying to get access to an ever-decreasing number of GPs. It should be noted that one of the doctors' practices in Skegness has also been in special measures. So, health deprivation will continue to increase and unless these issues are practically addressed there is little hope that the situation will improve. He added that this situation is not unique to the coastal area, he highlighted similar issues were experienced in the Woodhall-Coningsby areas too.

Sadly, according to Professor Gussy, caravan owners like to enjoy their last days where they have been happy and are attracted to spending these precious final days in their beloved caravans. Providing end of life care, which requires specialist equipment and specialist nursing, is virtually impossible in the restricted areas caravans afford medical teams. In the course of discussions was revealed that hospice providers find it difficult to identify where these people live as caravans presently carry no ready identification unlike streets would have in our villages and towns.

On the planning front, Councillor Tom Ashton described caravan sites as "a blessing and a curse." The pandemic had identified significant health and compliance issues. He admitted that the council had been aware of the situation for a number of years and if it were to be made a priority, he would support this move. He also stressed he would not like the number of caravan sites to spread inland. He dismissed a suggestion that all sites might be classed as residential, with all year opening standard. He doubted if the Environment Agency would agree with it anyway. Caravan sites were there for holidays, not to provide more homes. He added that he backed protected zones along the coast, they were essential.

The Council's Assistant Director of Planning agreed the department was understaffed and he felt the matter should be "sorted out once and for all." Lobbying parliament in an effort to update legislation was in his view absolutely vital and would give the council more teeth. He countered the suggestion that enough was enough by saying all sites were assessed against the requirements of the Local Plan, which dovetailed in the Lincolnshire Enterprise Partnership's Tourism Strategy.

We were heartened to interview a number of owners of sites which are run efficiently and effectively. They are members of national organisations, operate strict site rules and provide a wonderful experience for their patrons. However, without exception, they all said that they knew of sites which failed to respect the rules. They were all insistent that we should have a well-staffed Caravan Enforcement team empowered to be able to take action against what they termed as "rogue operators." They were well aware of sites which failed to adhere to conditions laid down by planning and then did not heed licensing conditions. This gives the industry a bad reputation and in turn this affects the reputation of our council.

They had varying opinions of improvements which would serve the area well. These ranged from improving the coast road and imposing speed limits to having a star system to promote compliance to give reassurance to both present day owners and future investors too. There was concern from some quarters that the saturation of caravan sites was taking over coastal communities and it was important the District Plan should respect that in its

drive towards growth. Section 106 agreements have not been successful in supporting village communities and flagging NHS provision and an overhaul is long overdue.

The most important message to come out of this Scrutiny Group is that we cannot afford to be complacent any longer. Funding must be found as a matter of urgency to staff this team effectively, without this there can be resolution to this issue which has challenged this council for decades. Lobbying Westminster to reform legislation, much of which is no longer applicable and dating back to the 1960's, is a necessity for the new council. East Lindsey is a market leader in the provision of this sort of holiday experience, so should take the lead on a national basis. Once our contribution has been recognised on a national scale there would be scope to build on selling this expertise on a commercial basis.

Increased partnership working as we go forward will be essential. We should work closely with the county council as the leading authority overseeing emergency planning and Trading Standards, who will be able to assist when taking on "rogue operators." It must not be forgotten that the lion's share of council tax collected goes to the county council, so they do have a vested interest in its success! Dealing with council tax, there were mixed feelings about the work carried out by Capacity Grid and concern was also expressed that PSPS needed to be trained more effectively in giving advice on this subject and attention to detail was important on the website too.

The team needs to have an effective timeline to work to and should report back to the council regularly on its progress. There is a lot at stake here - our visitor economy, skills, jobs and most important of all we must protect lives. We recognise that we lag behind on the skills' agenda but without reform of the industry there is little or no point in providing targeted skills' training.

Recommendations

1. To recognise the need to make Caravan Enforcement a priority for the new Council, with the first priorities dealing with the issue of unauthorised occupancy and to review and strengthen licence conditions;
2. The Caravan Enforcement Team was only created on October 3, 2022, and given it has inherited a huge backlog, which will take at least two years of concentrated work to clear, this council must recognise, as a priority, the need to staff this team adequately as well as employing an apprentice;
3. To receive the 7-year Caravan Park Development Plan drawn up by the Planning Enforcement Service Manager and set a timeline to bring it to fruition;
4. Draw up, as a matter of urgency, a register of every East Lindsey Caravan site, including existing planning permissions, and this to be shared with Emergency Planning Services;
5. The Caravan Enforcement team to improve liaison with the Council Tax Team, including improved training for relevant officers, in order to prevent the many current misunderstandings about who is liable for council tax payments. To also amend council tax website pages to make them clearer;
6. Review the findings of the Capacity Grid operation undertaken on behalf of the council in 2018-19 and make recommendations in the light of this review;

7. Liaise with the county council and / or VOA as appropriate to ensure the correct amount of council tax and business rates is collected from Caravan Parks;
8. The council to lobby MPs and Ministers to improve holiday caravan legislation and fines, which have not been reviewed by parliament since the 1960's;
9. Obtain specialist legal opinions on how a charging regime could be introduced for holiday sites, and a further opinion on strengthening licensing conditions, including the internal quality of the accommodation;
10. Consolidate the information available for the general public in plain English to stop the confusion about what is legal and what is not, particularly when buying a caravan on a site. This should have particular reference to Council Tax and local searches;
11. Investigate creating a star rating for all sites to consolidate standards of compliance as part of the longer-term plans for the caravan licensing team;
12. Work with site owners to encourage and promote membership of local and national support groups such as Caravan Park Watch and the BHHPA;
13. As the council dealing with the largest concentration of caravans in Western Europe, use this experience to consider offering training for other councils on best practice in the caravan industry. This could potentially provide an additional income stream for the Council;
14. Support relevant outcomes from Floodex and establish closer working relationships with staff at Skegness and Louth fire stations;
15. In future, officers dealing with planning applications for new caravan sites, or for existing sites requesting an extension to their site size or seasonal opening times, should be required to add Section 106 requirements when submitting conditions and these need to be followed up.;
16. Consider reviewing the Planning Policy in relation to caravan sites and any restrictions as part of the local plan review;
17. As part of their remit, the portfolio holder for the coast to arrange regular meetings with coastal operators - other portfolio holders could support on issues such as health and housing;
18. Seek to work in partnership with Lincolnshire Trading Standards to investigate 'rogue' operators.

What is classed as a caravan?

The name caravan is not fashionable at the present time, so the names twin unit, lodge, park home, modular home, modular lodge, tourer, transportable holiday unit, camping pod are all used. The definition, laid down by law, is that the unit has to be transportable. The legal definition is enshrined in law, but this dates back to the 1960's, having been updated in 1968, which states that the "unit" had to be towed on the back of a motor vehicle or trailer. It therefore does not include tents!

The 1968 Act increased the permitted size of each unit, which would have been delivered in no more than two parts, has a maximum length of 20m, width 6.8m and with a ceiling

height of 3.05m. Given this legislation dates back more than half a century and production has moved on considerably, these sizes are well out of date. Today many caravans are installed with decking and with hot tubs!

Log cabins, which are constructed in wood 'on site' are not deemed caravans and units such as the examples at Trusthorpe are not classified as such too. Any structure built 'on site' with foundations is not a caravan. If in doubt, look at the eaves of a building and if you discern a joint where the two halves had been bolted together then they came in two parts and can be classed as caravans!

What Needs a Licence?

Any unit which meets the definition of a caravan needs planning permission and is then subject to primary legislation which takes precedence on all other matters. Whether a unit is classed as for holiday purposes or for residential is governed by the stipulations of the planning permission.

Sites without planning permission cannot be granted a licence and can therefore be subject to enforcement powers. However, if someone has a caravan on a drive which is used by someone who makes use of the dwelling for say washing or eating, then this does not require permission or a licence. Sites that are used temporarily such as for rallies, engineering purposes or in the lambing season do not need a licence. There are also organisations which are exempted from needing planning permission.

NB - A council does not need to have any sites it owns to have a licence, but it is good practice to lead by example.

Who Does not Need a Licence?

- Anything that might look like a caravan but is not because it falls outside the legal definition.
- Caravans that require planning permission but are unauthorised and do not have planning permission.
- A single caravan sited for not more than two consecutive nights for a maximum of 28 days in any 12 months.
- Up to three caravans on a site of not less than five acres for a maximum of 28 days in any 12 months.
- Caravan Club sites
- Sites of up to give caravans certified by an exempt organisation and which are for members only.

Purpose of a Licence?

Holiday accommodation is subject to the 1960 legislation. This makes something of a mockery of the system as back then caravans seldom had facilities such as inside loos. But licensees are subject to an annual inspection to make sure they adhere to standards such as spacing, electrical wiring, access for emergency services to ensure the safety of

people on site, site lighting and footpaths - but this is not an exhaustive list. The licence ensures that the site ticks health and safety requirements.

Residential sites are subject to different conditions, and these are protected by legislation dating back to 2013. Unlike holiday sites these residential sites can be charged an annual fee for registration. On top of the planning conditions the majority of sites also have their own "in-house" rules and regulations.

Enforcement Powers?

This will depend on the designation of the site - residential, holiday or touring. Following inspections of sites, if the officer feels there are issues which need addressing, they will send an informal letter itemising the problems and giving a reasonable timeline for the work to be carried out. For instance, if a site has not had the electric supply checked for more than three years then this is flagged up and an electrical certificate will need to be produced. The drawback to taking the issues further is the desultory level of fines - a first offence will only cost a site owner £100 with subsequent offences only attracting a fine of £250. This has not been updated since the 1960's hence the low level! There is only power to revoke a licence after a site owner has transgressed three times, which is not adequate for this century.

The legislation is there to protect people on site but there are unscrupulous site owners as well as many operating with due regard to the rules and regulations. Sadly, the fines structure does not deter miscreants!

Holiday site failures can be directed to the local Magistrates Court, but residential sites have to be prosecuted by the Residential Property Tribunal.

Unauthorised Occupancy

If the permission granted to caravan sites is breached, occupants are then deemed to be occupying the site without authorisation. Different sites have different opening and closing dates, this varies according to conditions applied when planning is granted. Prospective purchasers of caravans need to make sure they are fully aware of the conditions applied to their chosen site before buy!

This is the biggest single problem for the planning enforcement team and the caravan licensing team to deal with. Covid has highlighted the extent of the problem due to the number of people who made contact with East Lindsey when sites were required to close during lockdowns. This put undue pressure on both the Housing and the Wellbeing Services.

<p>CORP002 - Uncertainty of future Lincshire flood defence scheme</p>	<p>Assistant Director – Planning and Strategic Infrastructure</p>	<p>The potential for coastal flooding (sea inundation) remains a real threat along the coast, limiting development (growth) opportunities. Recent changes in government policy in regard to partnership funding for flood defence schemes has left future prospects for the Lincshire flood defence scheme uncertain.</p>	<p>Without an agreed long term solution there is a concern that there may be a more significant flood incident in the future that would impact on the Council's ability to respond; and the level of risk may impact on the long term economic health of the district and the safety of communities.</p>	<p>The Council is an active member of the Lincolnshire Resilience Forum and Lincolnshire Flood and Drainage Management Strategy Board. The Council will continue to work with partners, local MPs and the government to identify a solution to the future funding needs of the Lincshire scheme. The Council is also undertaking a number of activities including its Strategic Flood Risk Assessment to support and inform the Local Plan moving forward. Equally, the Council is part of a number of groups, including a collaborative approach with the Environment Agency, to seek to identify the challenges and opportunities for the coast in the future.</p>
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EVIDENCE GIVEN TO THE PANEL

Bob Wagstaff - Deputy Head of Revenues and Benefits for PSPS

(Bob has 35 years of experience working in this discipline and worked for ELDC before PSPS (then CPBS) was founded. He was a Fraud Manager working for the council.)

Bob explained that caravan sites with a holiday designation are subject to business rates which are set by the Valuation Agency. They are subject to the Local Government Finance Act. So, there will be one bill for the whole site, rather than each individual caravan being charged. However, if a caravan is used as an all-year-round residence it will come under the provisions of local council tax and is charged as such - normally as a Band A property. When planning permission is granted for a site then the council will inform the Valuation Office, which carries out the assessments. The council keeps no records of who owns caravans, all this is down to the site owners' responsibilities. It is all laid down by legislation - but this legislation was created back in the late 1980's before the days council tax was introduced and has never been amended. East Lindsey has no discretion whatsoever, it would need the government to change the legislation to alter anything. There is no legislation to require site owners to report caravan sales etc.

Business rates do not hugely benefit East Lindsey. How much of the £2m business rates that Butlins pay annually for their caravan site actually comes back to this council? The monies are collected and go to the government who then returns payment based on an agreed formula. And council tax also presents a challenge. If a caravan is Band A this will bring in approx. £1240 to £1350 but East Lindsey's share is approx. £130 to £140 per caravan. The county council takes the lion's share of the monies, so it would help if the two councils worked together on this, just as they are working together on the single person discounts at the present time. So, the financial gain is not as high, and this would need to be set against the costs of investigation. Interestingly a holiday cottage built of brick would be deemed an asset and would be subject to council tax unlike a caravan! But lodges constructed in wood are deemed to be treated similarly to caravans and are subject to business rates.

He explained that before Covid work was undertaken by Capacity Grid when they contacted all of the site owners for details of all residents on their sites to ask where owners lived. This was then double checked. This gave the council some idea of the extent of the problems faced. Bob underlined that this is a problem specifically suffered by ELDC but suggested that there might be a similar challenge on the East Yorkshire coast. However, it was difficult to put a figure on how much might be being lost - it could be in the region of £1m but there was no exact measurement to rely on.

Identifying who should pay council tax is a variable. But a Councillor revealed he had to take in his council tax bill for his regular residence to show that his caravan is actually not his permanent home. Clarification was sought if a person occupies a caravan on the driveway of a property would it be subject to council tax if it were used as a residence. Bob explained if the caravan was connected with the main residence, it was not charged. However, if the caravan were rented out to a.n.other then they would be subject to council tax. Touring caravans parked on drives are not charged.

Councillor Dennis highlighted abuses other than council tax - disposing of waste for instance and Councillor Harrison felt that the cost to health services was not covered too. But it was agreed none of this was covered by the legislation.

Jo Parker - Service Manager Enforcement at East Lindsey with Laura Gale - Senior Licensing officer for Caravans at East Lindsey.

NB - The facts and figures at the beginning of this piece of work were provided by Jo and Laura to explain the background context to this investigation. The information recorded below expands on their roles.

These two officers look after the licensing of the largest concentration of caravans in Western Europe. This currently comprises 262 sites of which 22 are residential sites. This boils down to a total of 36,800 caravans with more sites up for planning permission in the coming months - and that could be at least 100 more units - and they will all need to be licensed. This team is facing a backlog of 114 sites with further sites to be added as they come to planning. There are 14 certificates to be verified for people deemed suitable and fit to run sites, six are going through and a further eight have been refused, they have the right of appeal and consequently are awaiting legal proceedings. When this time-consuming work is completed, the council will be able to publish the details of the suitability and fitness to operate measure.

The department was inaugurated on October 3rd, 2022, and from the word go has been faced with serious issues to get to grips with. After a restructure caravans moved to Enforcement having previously been dealt with by a stretched Environmental Health team, whose varied roles also included fly tipping and scrap metal to dog control! The move was welcomed to give the caravan issue a higher profile. The new set up was modelled to include two members of staff transferred from the Environmental Team but this has not yet happened. One of the duo, the proposed Caravan Licensing Officer, was seconded to Boston to deal with anti-social crime and Laura, who was promoted to Senior Licensing Officer, is at present concluding a two year long piece of work on the new computer system called Uniform. So, there are roles to be filled - a Technical Caravan Licensing Officer is to be created - before progress can begin to be made. Ideally Jo would like to increase the size of the team, given the challenges ahead, and to create an Apprentice role too. All members of the Scrutiny group felt this would be the only way the council would ever be able to finally begin to conquer this long festering conundrum!

The small team are to join in the autumn's countywide Emergency Planning Review, which is part of a national initiative. They will be working to ensure should there be another North Sea inundation that evacuation plans will be adequate to avert a high death toll. Lessons learnt will help the team in its forward planning.

There was discussion about the existing council tax legislation, which alters according to whether the unit is a residential or a holiday site. Holiday site units are not individually subject to council tax unlike residential sites, and it was admitted that very often members of the public find the detail confusing, and this causes a lot of problems. It was suggested that the Council Tax team, who work for PSPS, and the new Caravan team should have better liaison and that the council tax team should have their training upgraded to help prevent the on-going public misunderstanding, which understandably got worse during the Covid outbreak.

This led on to the major problem of unauthorised occupancy of caravans, an issue which has plagued this council for at least 20 years, if not longer. The new team identified the on-going situation as "having been on the back burner for too long." The seriousness of the issue was a huge challenge to East Lindsey when Covid 19 struck. Sites had to be closed down under the pandemic regulations and it was estimated at that time that 6600 people were living unlawfully on sites. This impacted negatively on the council's Housing

and Well-Being services, as well as the emergency services and the NHS at a time when all services were already under considerable pressure. These challenges sadly have not gone away, and it was revealed that there are deals going on where unscrupulous site owners are taking money in return for allowing people to continue to live on site. Evidence was provided that windows are blacked out at night and gates to sites are locked to give the impression no-one is on site. The health and safety risks to these "residents" are unacceptable and it was agreed that everything had to be done to safeguard people at risk. It was unanimously agreed the council cannot be seen to be allowing people's lives to be put in danger.

The Chairman invited both officers to the next meeting of the Scrutiny Group to give feedback from the officers following the Emergency Planning Exercise, part of a national initiative in mid-November. The exercise had been due to run in September but had to be delayed following the death of HM Queen Elizabeth. It was felt that what was learnt from the exercise would provide further detail useful in the Scrutiny process.

Jo Parker explained the attendees had been put into groups to consider how they would plan to cope with a scenario of 80mph winds sweeping down the coast creating a tidal surge in the area approximately encompassing Ingoldmells, Addlethorpe and down the coast towards Skegness. They were both put in the Evacuation and Shelter Cell which included housing specialists, education, the police, wellbeing, and voluntary services such as St Barnabas. Some of the things they were asked to consider included tracking evacuations, donations, communications, impacted areas, connectivity of services, interim housing, identifying caravan parks, financial implications, and the national steer! Working together they were asked to come up with possible solutions.

Caravan sites could be washed away entirely and might not always be possible to reinstate. They were told for the purposes of the exercise there would be 51,474 people in the area, including caravans, with an average of two or three to each property. Working on 20 percent of people refusing help this would equate to 41,394 evacuees and of these 6209 would require transport and shelter. Five evacuation centres had been identified as well as the need to take people out of the zone with Peterborough and Nottingham being possible destinations but presented knock-on effects for emergency teams.

Jo reported that questionnaires which had been prepared needed to be more robust, there was not enough information and people needed to be identified far earlier in the process. She added it would be unlikely that caravan owners would have been insured because of their vehicles being in a high flood zone. Transport implications needed greater investigation, particularly for people who had nowhere to go. She explained that caravans, unlike vehicles, have no identification marks and if they were washed away 1000s could literally end up anywhere and there was no way of knowing where they had come from. Rebuilding afterwards would be a challenge and some sites would not be able to be redeveloped, so the implications for housing these "homeless" individuals would be beyond the ability of a rural district council. At the present time this would be further challenged by the housing of hundreds of asylum seekers in hotel accommodation in Skegness. This would entail negotiations with the Home Office, which would not be speedy! Having to knock on over 6000 doors to check on occupants would be far beyond the physical ability of just two officers and would need supplementing by say the Army. It was felt it was vital to lobby MPs about these potential problems before any disaster happened.

When planning permission and a licence are granted for a caravans site, a flood plan must be in place. But there is nothing in place to ensure these plans are robust. The Environment Agency does have a flood plan template, but officers can only try to push this, it cannot be enforced. With legislation to back evacuation plans officers have little or no ability to challenge.

Perhaps the most concerning aspect of the exercise for the two East Lindsey officers was, however, that there had been a major underestimation of the number of caravans affected. The team estimated in the region of 16500 caravans would be affected with just one small breach at Ingoldmells. There would be a knock-on effect on other sites too - all the sites of one of the major operators on the east coast would be affected. Floating caravans would present a hazard and could stop people being able to flee the area.

One of the challenges of where to signpost members of the public escaping any possible disaster would be finding a site where for instance temporary housing could be erected - for example, an airfield. But Jo explained there is nowhere in the area earmarked for such a site, there is no provision whatsoever in the Local Plan. More robust planning was a necessity.

A full report of the Lincolnshire exercise should be available by the end of the year or early 2023. John Challen, responsible for emergencies in the East Lindsey area and Christian Allen, the Assistant Director, would be getting copies of this.

It was accepted this was a worst-case scenario but as Councillor Mrs Sandra Harrison pointed out the sea had come over a number of times since 1953, including witnessing it herself at Sutton-on-Sea and Sandilands.

Members felt that with modern weather forecasting it would be possible to warn people in advance of a potential surge to allow them time to evacuate the area and Laura felt that early warning was vital for everyone, so better liaison was required to be put in place. Councillor Dennis stressed this was all simply theory and was important to be able to evidence risks and work with operators to ensure the vitality of the tourism business along the coast.

Councillor Martin Foster - Portfolio Holder for Emergency Services

Councillor Foster said he knew that Covid had uncovered a lot of discrepancies on sites, with owners allowing people to stay on during the winter season. Unfortunately, the council's records had not been adequate to identify the extent of the problem, but Covid had certainly highlighted matters and the council was now aware this was a problem. Current information was "sketchy," but he felt sure now that would be rectified.

Councillor Foster felt that with the engagement of 'Kingdom' to cover the Environmental Crime functions, it freed up staff to transfer to the Caravan Enforcement Team. He said at least now the council could make a start at tackling the problem. He felt this was a positive move, but he accepted that caravans were not an issue which would be solved overnight. However, he gave an assurance that the Assistant Director responsible for Emergency Services, Christian Allen, based at Boston, was taking the issue seriously and so he was confident going forward.

He stayed at the Scrutiny to take part in the feedback from the Emergency Planning event attended by both Jo and Laura. He said he had been made aware of the exercise but had not been invited to take part in any of the proceedings.

NB: The Caravan Enforcement Team was present during this discussion and made it clear that unless the extra resource suggested by the Portfolio Holder was expanded, resolution of the problems could not be successfully attempted.

Mike Gildersleeves - Assistant Director, Planning and Strategic Development

Mike explained he wore many different hats as far as caravans were concerned, from the application at the very beginning looking at the economic and social aspects of the submitted plans through to planning enforcement, working with Laura on the licensing aspects which fell outside the Town and Country Planning Act. This partnership, which he felt had been a sensible move, went live at the beginning of October with changes to the Environmental Crime department.

And from the very start Mike stressed that despite these changes "This service is woefully under resourced given the issues the council has." He was very clear that "the council needs to put its hands in its pocket and pay for the resources to sort the situation out once and for all" And he stressed that MPs needed to be lobbied to make sure the legislation was fit for the 21st century and fit for purpose. Working with partners the council needed to talk and guide, using its experience to good effect.

All applications for caravan sites are assessed against the requirements of the Local Plan, which positively encourages tourism, recreation, and economic development. This dovetails with the three major requirement of the Lincolnshire Enterprise Partnership's tourism strategy - seasonality, skills, and sustainability. He said he felt the restrictions of the season had a disenfranchising effect which had a negative effect on skills - e.g., should good staff such as chefs be kept on the books over the winter. He was keen to improve the quality and diversity of the offer and also promote eco-tourism.

So, when is enough, enough? He noted that if applications ticked the district plan box the rapidly expanding market needed to be encouraged. The council had yet to reach "enough is enough." However, if physical harm became apparent an application would be refused. Planning would not accept two villages physically linking up for example, a reasonable degree of protection was important.

He lamented the lack of national legislation, which has been on the statute books for over 60 years. So much had changed in this period, the definition of a caravan now took in lodges, glamping etc and this presented a myriad of challenges, particularly where enforcement was concerned. And the tests of suitability had not moved along, and model conditions were not updated. The government had not kept up with the times, so challenges simply increased. Conditions were based on six tests, including policies in coastal zones i.e., operating until October and re-opening in the spring; standard holiday only conditions and the requirement to register who was on the site and keeping the register up to date with the onus being on the site owner to carry this out correctly. (NB Site owners are not required to produce the register when an officer calls on them, they are usually given at least 48 hours to comply.) He admitted there were unscrupulous owners operating along the coast but unfortunately all enforcement was at present reactive rather than the preferable pro-active.

He admitted he had been disappointed the council's initiative to extend the season had failed. Whilst the council had rules about on-site safety as did each site, the environment agency had concerns about the number of people who might be living on sites permanently. But he was quick to remind members that all site owners should not be tarnished for the actions of a few allowing owners to stay when they should have left.

Jo Parker stressed that good owners did keep registers effectively but there were some "dodgy" sites. Whilst the council had tried to reach out to stem this, sadly the lack of resource prevented it. Inspection of sites needed to be done pro-actively. She said she knew of sites which had stayed open because children needed to go to school! Other sites

saw residents move to winter lets. Enforcement law was unfortunately very old, and some sites had been carrying out their own "rules" for so long that it complicated taking action. Enforcement could only be effective if officers were confident, but some owners were prepared to take a risk, and this opened up something of a Pandora's box! Fighting cases could be very expensive and very time consuming, so the proposed corporate plan would need to take this into account, and this probably meant employing specialist lawyers to ensure greater compliance.

Mike added that recently a number of sites had changed hands and this trend looked set to continue. So, establishing a good relationship with site owners would become more and more important. He particularly liked the idea of rating sites, which would drive up standards he felt.

Councillor Dennis added it was landlocked sites which were being sold. Caravans were now up to a third bigger than in the past, so sites would adapt accordingly. He felt owners should be encouraged to sell an experience and this was the way forward. He had been very supportive of a 12-month season, so many visitors had told him and Councillor Brooks they wanted to come to their caravans for Christmas.

Mike said that sites and caravan owners tended to compare and contrast their terms and so there was inevitably much argument. He said planners tried to explain the terms of the conditions imposed but he felt that the marketing of sites did not always reflect planners advice! This was another good reason why the star rating system, scored following annual inspections, would be a bonus for the caravan industry and this system could become an exemplar for the rest of the country - and could be financially productive in the process.

He explained the material considerations for granting planning permission were not unlike those for a caravan site but unlike a house a caravan can be moved round! So, numbers and high-level impact are important. Prospective owners might like a view of a lake whilst others want to be sited well away from children's play areas which tend to be a big noisy. He was not an advocate of the proposal for two storey buildings on site for evacuation purposes, he preferred to reply on timely conditions, based on the requirements of the District Plan. He added that he expected a new Strategic Flood Plan was due to be published in 2023.

Councillor Tom Ashton - Portfolio holder for Planning

He said as far as he was concerned caravans were a blessing as well as something of a curse! But he said there was robust evidence East Lindsey must be doing something right as thousands flocked to our coast every year. He said this was greeted locally with a degree of derision and snobbery because wanted a better quality of holiday to be offered. However, the visitors spent significant amounts of money to have a caravan on a site here and it would be an economic crisis for the district if they disappeared!

He admitted that the pandemic highlighted there was a significant issue with complaisance with the regulations and the enforcement of conditions, indeed he noted "some sites took the biscuit!" He said the council had been aware of the situation for a number of years and the council now had to decide if this was going to be a priority. If it were to decide to support enforcement, he felt sure the team would be able to crack a lot of the problems. Basically, if this were to happen a solution needed to ensure that both residents and holidaymakers had confidence in the system. Were the council to make this a priority he said he would back this.

When asked if the county council, on which he serves, should be a partner in any such moves, he said he felt East Lindsey would be pushing at an open door and would be supportive. But given East Lindsey was the planning and licensing authority it was important they should take the lead.

A member of the Scrutiny group asked if the answer were to make all sites residential, but this was dismissed, licences could not be changed just like that, and it was unlikely that the Environment Agency would give their support to any such move. It would also simply create a different problem! Jo Parker supported this and added that unless a site owner wants to be residential it would be impossible to make them. It would need a different form of legislation because it did not fit the criteria.

Councillor Ashton said he would be very concerned if this happened. The whole crux of the industry was to support people coming to the district for their holidays rather than living here full-time. The majority of caravans were not suitable for full-time residential usage, they were not energy efficient for a start! He admitted he absolutely hated the concept of park homes, which he felt were inappropriate. They had steps up to the back door and given they were designed for people post 50 he felt there was already a hazard. They did not have to have energy certificates to sell them. He felt they were almost the slums of the future and compared them unfavourably to American trailer park dwellings.

Jo Parker responded to the suggestion the issue should be jointly run with the county council. She felt working with the Emergency Planning sector was essential moving forward. The district had the site histories, and an upgraded team would have an up-to-date mapping system. This would be invaluable if the sea ever breached.

Challenged with whether we had reached saturation point with sites along the coast, the portfolio holder commented when something stopped growing it usually start dying. There were applications coming in all the time and permission sought for extensions which suggested the industry was growing - and this stopped he admitted he would be worried. Today's sites were not like those started over half a century ago and today we had the sense to identify protected zones. It was essential this should be kept in the District Plan when it came to be reviewed. This needed to be evidenced, however. Admitting there could be thousands living unlawfully in caravans along the coast, he felt protected zones were necessary to reassure residents.

He was adamant he had no desire to see the spread of sites inland, particularly in the Area of Outstanding Natural Beauty. He said SP15 required that inland development should be small scale, probably farm diversification, where pubs added glamping and shepherds' huts. High quality developments were needed - the spread inland of caravan sites should not be agreed.

It was suggested that new sites should have Section 106 requirements to support local GP practices, evidence showed that the NHS was losing out locally otherwise. Jo Parker said Section 106 conditions had been used successfully where highways needed upgrading as a result of caravan sites growing up. Evidence would be needed to support this need and the NHS would need to work in partnership with the council to produce this.

It was noted that the legislation covering the caravan industry was hopelessly out of date, having originally been passed in the 1960's with little or no revision since. Councillor Ashton said he was happy to be in contact with MPs on the subject, despite feeling frustrated at the lack of progress he had experienced with his Westminster deliberations on Drainage Boards. A visit to the coastal area by the Local Government Association had been postponed after the death of HM The Queen, but when it was rearranged, it would be a good opportunity to highlight the salient issues.

Professor Mark Gussy of Lincoln University.

Professor Gussy is the Global Chair of Rural Health and Social Care. He is one of the world's foremost research leads specialising in rural health care. Initially he trained in dentistry at the University of Melbourne but moved to Western Australia to develop his growing interest in the provision of rural health care. He came to East Lindsey's notice after a newspaper article in The Target in July 2022 highlighted the findings of a university research project.

He explained that his department was newly established at the university, so it had been important to scope the area and look at health data. To do this key local health and wellbeing organisations. Their intention was to identify hot spots and areas of unmet need in order to come up with priorities. The east coast was identified along with other county sites which included Gainsborough, Scunthorpe, Boston, and Grimsby. A positive response from the Primary Care Network covering the area from Mablethorpe down to Skegness was received and its team reached out and asked for help and support with the situation which faced them. He said the researchers soon identified there were high levels of need, so a partnership of joint working was soon established. He noted that one of the GPs at the Marisco practice was particularly interested in being involved and he identified Kim Barr, a connector from the Neighbourhood Team were particularly interested in developing this work which included mental health and social care.

The Professor said they found a big gap in the provision of care and the supply of care. Through the course of their work the issue of caravan parks came to the fore. There was a significant local narrative about the role of these parks in their demand for services and the complication of seasonal migration. His team tried to delve deeper to understand the situation but soon realised very little was known about the issue!

He said he realised there would be high need for health and wellbeing but there was little connection with the health service to ensure problems could be dealt with at an early stage of a disease's development. There was little information to determine how many people might be living in caravans, so the researchers used census data. This was complicated by the fact that caravans did not have any form of identification let alone postcodes!

Looking at the demographics of this type of "temporary housing," these people tend to be older, less well educated, they have low skill levels often having worked in the hospitality sector and tend to suffer more illness and enjoy poorer health. This in turn would suggest they have more problems in connecting with health services and often have less "literacy" at how they access these services. Indeed, some people fail to connect with health services as they do not want to be identified as living on sites because they simply do not want to be visible to councils where they might be liable to pay council taxes if they are living on sites full-time. For this reason, they also do not register with local GP practices. All these factors combine resulting in failure to attend for screening and only make contact when a condition has reached a more serious level and are therefore at higher risk.

This has a knock-on effect on how the government then funds healthcare. Whitehall provides health service funding based on a capitation formula where money follows resident numbers. If caravan dwellers are not registered, then there is no funding for this group. Whitehall does not take into account when administering the formula that weightings should take into account localised factors. Literally one size fits all. This in turn creates tensions in communities so the health service along the coast suffers an unfunded burden. A financial figure cannot be put on this because the level of the problem has never been accurately assessed.

There is an added problem that many of the caravans which are lived in all year round are not of an adequate standard to be fit for habitation during periods of winter weather in particular. Poor housing is accepted as a major determinant of health and well-being. Healthcare professionals and district nurses in particular report how difficult it is to provide care within such confined spaces. Once caravan dwellers become immobile the situation becomes even worse and is amplified by frequent overcrowding. The Professor admitted this problem is not just confined to the coast, he said the team had discovered similar hot spots in the Woodhall Spa and Coningsby area.

Jo Parker added that St Barnabas Hospice had reported many people wish to return to their caravans when they have life limiting conditions, they wish to die where they are happy. This complicated matters further as the caravans have limited space for the installation of necessary equipment - and locating the caravans frequently proves problematic for healthcare practitioners including the emergency services. "It is a snowball effect," she explained.

The Professor stressed his key focus was health. From his perspective he was concerned people chose to live on caravan parks because he felt they had significant unmet health needs, and this was not being addressed and unless this was not addressed the situation would get worse rather than better. This group's health conditions needed to be managed earlier, sorting things out at too late a stage cost the health service far more money and high demands on existing systems.

Whilst the present situation continued to be "accepted" this population would continue not to engage, so finding a way of sorting this out was vital. Unfortunately, this might prove unpopular given the health service was already in crisis it meant that people would continue to have trouble accessing care. Inevitably this caused tensions, not just seasonally. It was a high risk which needed regular monitoring.

Unfortunately, the present basic structures were unfit for purpose and this burden would, inevitably, increase. Even if the caravan parks did not exist the health service would struggle to meet the needs of the coastal population from Mablethorpe through to Skegness.

N.B. The lack of GP appointments along the coast tends to result in attendance at Accident and Emergency Units in Lincolnshire. "The cost to the community of a GP appointment is about £39 whilst attendance at an A & E costs the taxpayer an average of £359 per appointment. In essence this is bad for the patient, challenging for hospitals and more expensive for the taxpayer. (Source The Times - 7th January 2023.)

Caravan Park Owners / Operators

The group wanted to meet some existing site operators, so we invited five individuals along to talk to us to share good practice and look at how we might look to improve our relationship with the industry as we go forward. The quintet invited were as follows:

Mick Wright - General Manager, Sutton Springs. He is in charge of seven parks of which five are in the Sutton area, one in North Yorkshire and one residential site. This comprises 700 statics and 250 touring caravans.

Gareth Rowlands - Holivans at North End, Mablethorpe which has been operating successfully since 1951 (before the great flood of 1953 where the only damage was about five inches of brackish water) with 165 caravans. He is a member of Caravan Watch and is in regular contact with this group.

Charles Jude - Director Tomlinson's Leisure Park, Chapel St Leonards, and Caravan Watch

Margaret Reeve - Virley House Country Park and Caravan Watch. 65 Touring and Static Caravans

John Chappell - CEO Ellis Bros. Skegness Water Leisure Park, between Ingoldmells and Skegness

All our attendees are committed members of the two important organisations listed below:

- Caravan Park Watch is a local initiative, set up in 2014 to tackle caravan related crime across the East Lindsey area; It is made up of caravan site owners site managers, Lincolnshire Police, and representatives of the caravan industry, including insurance companies, Lincolnshire Fire and Rescue and ELDC's site licensing team. It was originally aimed to cut back the number of burglaries on caravan sites during the winter. This has led to a decrease in such crime by almost one half.
- British Holiday and Home Parks Association, which was founded in 1950, is a national organisation, representing and serving those who own and manage park establishments providing holiday caravans, chalets, park homes, tenting, touring and glamping pitches . It lobbies on behalf of the industry. There are three different categories of membership, starting at £192 + VAT a year.

All five contributors were very supportive of the East Lindsey team and enthusiastic to work positively with the council in refining site conditions to enhance the coast's offer.

Mick explained regulatory conditions at his site in Yorkshire were very similar to those imposed at East Lindsey. The Yorkshire rules were easy to understand and work to and he said he had shared this with this council's team. All his sites had a set of their own rules and regulations on top of the council's regulatory requirements. Everyone was required to sign the paperwork, which was based on the HH's standard scheme, which ensures only statics are suitable for holiday purposes. Any suspicion that this requirement is being breached is taken very seriously and could lead to the owner being ejected.

Gareth said they also had a set of site rules, people had to prove their home addresses etc. Head Office scrutinises these carefully to ensure the legalities are completely in order. He said they worked closely with Lincolnshire Trading Standards too.

Both witnesses said their rules were clearly set out and detailed, including the details of each caravan. And all owners were required to sign the paperwork. If there is any suspicion of anyone living in a unit, they are no longer welcome on site. There is a section on the site agreement where owners are required to insert their permanent address. Owners have a copy of their signed agreement; a further copy is retained by the site operator and a third signed copy is sent to the council. To ensure that owners do not try to "pull the wool over the site operator's eyes" they are required to produce evidence of their home address in the form of a council tax bill, utility bill or a television licence at the given address. The caravan owner is told that all correspondence will be sent to this given address, no other addresses are admissible. This is an annual requirement. Touring customers have a similar licence agreement, but this is much shorter, lasting for 20 years. But a seasonal licence is just for one year.

It was agreed that Covid had been a difficult time because the government had come up with so many exemptions during lockdown periods. This had made it difficult for site owners to disprove that owners did not have a right to be at the caravan park. The

operators wised up in the second lockdown and closed their sites, so people had to move on!

Both Mick and Gareth, supported by the three other operators, stressed that it is only good practice that should be tolerated on sites. Operators did not have to join any of the national organisations by law, but they felt it was advantageous to do so. Compliance could only be ensured by strict enforcement, however.

It came to light that during periods of closure it was essential to continue to be in control. Any owner wishing to carry out maintenance during the period of closure would be forbidden to stay overnight on the parks. The controlling barrier was only open between 9am and 4pm and strictly enforced. Mick said there was no arguing, the rules were there to be adhered to. Rowland said on his site people could go for the day if they say wanted to walk on the beach or enjoy a local cafe but services on the site would be turned off to make sure no-one took advantage and tried to stay over! They worked on the rule there should be no exemptions to their rules, which was the fairest way. They felt this also supported the work of the Emergency Planning team.

Barriers into the caravan sites were operated by codes, which were made available to the Emergency Services. Barriers generally were overseen until midnight though. Rowland said on his site all owners were provided with the "What Three Words" location identifier which could be used by owners needing help of an emergency nature. On his site staff had first aid training and there was also a defibrillator.

Margaret joined in at this point, reminding that Covid had highlighted the thousands who had come under the radar and were living unlawfully on sites. This had created a great deal of resentment dividing the community. So many sites had breached the regulations and it was vital this was addressed sooner rather than later. She added that there were variations in the planning permissions given by the council, why were some sites given 12-month usage...but why? How could this work? This made enforcement extremely difficult, not least in controlling unlawful usage. She was angry that hundreds of caravans are being mis-sold along the east coast each year. People were running businesses from caravans being used unlawfully and children were attending local schools. These owners had often sold their bricks and mortar back where they came from, and they were now left with no equity and if it was found they were unlawfully sold their caravans they had nowhere to go if forced to leave a site and were literally left stranded in East Lindsey. She also voiced alarm that the East Lindsey website contained muddled and contradictory information about council tax. When owners rang the council, they were even getting wrong advice by staff working on behalf of East Lindsey. She said most people wanted to abide by the rules but without the right information they could not do so. This could have financial implications and needed sorting out quickly. She insisted the time was right to redraw the rules regarding caravan sites so there was a level playing field which could be followed by everyone.

Charles admitted residents were not keen on tourists making life difficult for them where they live. she noted that the infrastructure just could not cope with the ever-increasing numbers. 1200 more for instance at Chapel and 58 extra at Addlethorpe. This needed stopping, he argued. Checking who was where was impossible as they did not live in the village full-time, so effective policing was impossible. There just were not enough resources to round as a result. This has been a problem for years and matters were just getting worse. He said he felt the Capacity Grid had "charged around the are like a bull in a China Shop" upsetting people even more.

He said he had spoken to caravan suppliers based in Hull who had told Jim that 65percent of caravans produced were not up to residential spec. So, in his view, people were living

in caravans which were not habitable. This was a huge problem adding to the existing problem of stretched services...and he admitted he was aware of caravan parks not following "the rules." As an owner he said he felt frustrated, particularly with the lack of action by the council.

John Chappell of the Skegness Water Leisure Park reminded that the customer should not be forgotten. He said the majority of owners wanted to do the right thing and did not want to get caught in the middle. He said his site had rules, his were based on advice from the BHHPA and were enforced to the letter. If owners failed to follow them they were removed from the site. All caravans were privately owned and were for a restricted family usage, there was no sub-letting (however he said this was being varied, with permission, at their Ingoldmells site).

There was a spirited debate between the operators about how "rogue" sites should be dealt with - Trading Standards could be useful in regularising this. They agreed some owners were deliberately mis-selling and it was pointed out that if these wrongs were righted then the council would not be above to fulfil the demand for homes - noting that this section of the community would be left with little or no capital. Jo Parker explained without a local connection the council would not be required to house these individuals. Site owners who had mis-sold could find themselves in court, Jo continued, facing prosecution under the proceeds of crime legislation. But this view was challenged, and it was agreed legal advice would be required to support this stance. The discussion concluded that if licensing conditions were to be strengthened this should improve the situation. This would be subject to full public consultation, however.

The quintet also recommended that in the anticipated future review of sites, each site should be required to have a customer contract which would be signed by both operator and owner.

All were enthusiastic to keep in contact with fellow East Lindsey sites and with officers and it was agreed that the Portfolio holder should call meetings at regular intervals to facilitate important networking opportunities.

Finally, it was agreed that the granting of 12-month permissions were on gushing as it could be deduced these were confusing as it could be interpreted these were then residential sites, when they were not. This needed immediate clarification as it muddled the landlord/tenant legislation. Site owners said they did not wish to operate on a 12-month basis. Time was needed to carry out maintenance etc without upsetting the customers. Most owners preferred to remain holiday sites for this reason.

Jonathon Moses - Director of Blue Anchor Leisure.

Mr Moses originally came to the east coast back in 1994 to work on the Pyramid at Fantasy Island and 20 years later he is still in Lincolnshire! After Fantasy Island was sold, he went to work for Bourne Leisure. He then re-joined Blue Anchor after his brother-in-law John Woodward died. He explained that as well as running holiday sites the firm is building 284 houses in Buxton, owns 400 acres at Doncaster Airport and warehousing too. He explained that Blue Anchor had grown considerably over the years and now employed 144 full time and salaried staff as well as over 400 operational staff for the season. Blue Anchor has moved with the times, investing millions on the coast to ensure their product and image endures and the company prides itself at being at the forefront of employment, moving forward with educational opportunities to ensure that their staff retention is very high. They have 16 caravan parks in Lincolnshire from Mablethorpe down to Croft Bank - the sites encompass the traditional "kiss me quick" holiday offer to catering for the green

pound for couples where they can relax, fish, and enjoy open spaces and wildflower meadows. Over the last five years the company has invested heavily in their venues, and they are now very much a regional brand, lifting their product to cater for the holidaymakers who come from cities where facilities are more sophisticated! Their entertainment venues attract not only visitors but local people too and this year celebrate their 50th season with 50 special events. There are a variety of sporting events organised and entertainment - which Mr Moses rates as even better than those provided by Magna Vitae - as well as restaurants where upwards of 1000 people a day are fed! The community is encouraged to enjoy on site facilities, except the swimming pools in summer when numbers are restricted for safety reasons.

The Scrutiny team agreed to Mr Moses' request that he should not be quoted directly so his comments are simply listed below:

- His company works hard to ensure no-one lives on site with a Pitch Policy Team are employed to ensure compliance.
- Standard vans continue to increase so more space is needed to keep numbers constant. However, when an older van is removed there is not adequate space to slot in the replacement, gone are the days of caravans in rows. This leads to spend on each site being reduced, which particularly hits the smaller sites.
- Disappointed that there is not a standardised closure period, which would ensure equalisation. His company uses the closed season for site maintenance, which is not possible when holidaymakers are enjoying the rest and relaxation usually on offer.
- He feels that tourism can enhance village life and increased funding could then lead to improvement in services.
- Whilst he understands local concerns, it is vital that there are jobs for local people to encourage young people in particular to want to stay in the area. There is no point in improving skills if there are no jobs at the end of it.
- Training and skills are expensive, so owners need the incentive to be able to retain their staff.
- The council should not concentrate simply on the larger sites, their focus should be on the smaller sites too.
- The lack of staffing of the enforcement team leads to some operators failing to adhere to compliance.
- Site rules should be down to the operators and their customers
- He is not in favour of a star rating system; he would prefer an incentive-based approach that would encourage increased compliance amongst those that are currently not fully compliant.
- To improve road safety, he would like to see a speed limit along the coast road.
- He feels the local plan should look at the possibility of caravan sites being on both sides of the A52, as the coastal strip is currently restricted by the A52.

Cllr Lindsey Cawrey, Lincolnshire County Councillor with special responsibility for Fire, Rescue and Emergency Planning with Mark Baxter, Chief Fire Officer for Lincolnshire, and Chairman of the Lincolnshire Resilience Forum.

The Panel felt it was important to be able to reflect on the recent flood exercise on the east coast (part of a national initiative) Originally it had been hoped to stage a physical test to assess plans for an evacuation in the event of a North Sea surge overflowing.

Unfortunately, however the exercise coincided with the death of Queen Elizabeth, so the scope was curtailed. Mr Baxter felt it is very important to fully understand the risks and how the emergency services would seek to mitigate them.

He said he felt experience showed that the highest risk of such an event was between November and February. He stressed that out of season his service had no idea of how many people might be staying in caravans and for this reason it was essential for his teams to work closely with us as the local authority. He was confident that emergency services do have the resources to be able to respond to a major flood incident and he reassured that such an eventuality has been well-rehearsed with the national Resilience teams.

The Environment Agency has discussed this issue at length, and it had been agreed that despite having warning alerts in place, it was a worry that not everyone was receiving these communications. It was also a concern that even if they did get the alerts, there were elderly and disabled people needing special attention and they needed to be identified.

Lessons had been learnt from recent floods at Wainfleet and Boston had been very useful. The service also received Rising Tide alerts 72 hours before the event and this had been built into the system. This then gave his teams the opportunity to get structures in place and establish control points along the coast. He explained everything would be spearheaded from the control centre at South Park in Lincoln and an invitation was extended to the new council to visit the facility which many councillors may be pleased to accept. He felt that we could be assured there was a good level of assurance that plans in place were robust.

Councillor Cawrey explained that the Cabinet Office was working on promoting a national Emergency Alert system which is already embedded all over the world. This system sends out alerts with instructions to anyone who owns a mobile phone. Trials of this system are expected to be held in the next couple of months - a media campaign will follow. But the challenge always has been how to get people to respond positively, there will always be people who want to stay where they are!

The role of the ER signs was shared with Mr Baxter explaining they have been designed not only to help people escape from the disaster scene but also to keep routes clear so that emergency services can get to a disaster scene unimpeded.

There are three phases which cover such emergencies 1. Planning and have the infrastructure in place 2. The response phase where the water is rising 3. The well-rehearsed recovery which could last months, if necessary, and will co-ordinate repatriation. This phase is usually chaired by the local authority which has been affected. Councillor Cawrey told the meeting that things were planned down to the granular detail and would take in mobility issues and social care needs. For that reason, it was essential that the emergency services had good knowledge of where these people were to be found.

However, Mother Nature was not easy to overcome! Mr Baxter was asked what effect global warming would have on the east coast. He reminded it was the 70th anniversary of the devastating floods which took such a toll along the coast. He said he had discussed this with the Strategic Leader of the Environment Agency who had warned he had no doubt there would be a similar event in the foreseeable future. Whilst the EA was doing what it could to improve flood defences to mitigate any disaster there was only so much that could be done. He said, "we have to think this event will happen but when is difficult to predict." He added that we have been experiencing very dry conditions over the last few years and if the land continued to be so dry there was nowhere for the water to go.

We had a discussion about 12-month occupancy planning permission. Councillor Cawrey said she realised caravans were very important to the local economy and would not want to compromise this at all. However, this would need to be viewed with put into perspective. Climate change would need to be taken into account, were there to be a flood it would have a catastrophic and appalling impact on our east coast economy.

Mr Baxter warned that sites needed to be carefully monitored as the impact of a fire on a caravan site could be devastating. Density needed to be monitored, spacing was vital - once a fire started it soon spread. There was plenty of guidance available and site owners needed to be vigilant they were following the rules laid down in the 2008 regulations He told the officers present he would be grateful if they would regularly work in partnership with Fire Stations in Louth and Skegness to address this type of issue.

Conclusion

As the Chairman of this study, the last word rests with me! I can only stress loud and clear that this needs to be one of our major priorities in the new council. You ignore this at your peril!

Report author and Chair: Jill Makinson-Sanders