



Rocklands Caravan Site, Hastings

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Caravan Site Licence Compliance Audit

Rocklands, Rocklands Lane, Hastings TN35 5DY

For Hastings Borough Council

Submitted by
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Summary Sheet

Premises: Rocklands, Rocklands Lane, Hastings TN35 5DY

Project: Compliance audit of the Rocklands Caravan Site Licence Conditions

Date: 20th August 2014

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Company Information

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1.0 Summary and Recommendations

RH Environmental Ltd was engaged by Hastings Borough Council to undertake a compliance audit of the Rocklands Caravan Site Licence Conditions as required by the Caravan Sites and Control of Development Act 1960.

RHE undertook a site visit on 20th August 2014, assessing the site operations against the licence conditions. The visit included a walkover of the whole site, measurements to assess the spacing requirements, questions to the licence holders and the inspection of documents.

At the visit it was noted that Rocklands was a well-organised caravan park where the operation had been rationalised to site owned and fully serviced static caravans.

The site licence conditions remained generally applicable but do not accurately reflect the current site operation. The plan provided with the licence was not suitable and a fully detailed site plan should be required. It is suggested that the Council invite the licence holders to submit a new site licence application and site plan. A new set of conditions can then be agreed that reflect the current site operation.

There were breaches of the existing conditions that should be addressed by the licence holders. If a new application is submitted, some breaches may be addressed by the new conditions. However, resolving other breaches, such as the spacing requirements should not be delayed. The licence holders should also be reminded of the requirement to notify and gain prior approval from the Council for any changes.

A landslip has affected the lower part of the site. The stability of this and the surrounding land should be fully assessed by an expert surveyor or civil engineer. The land affected should be subject to remedial works under the direction of an expert, such works may include re-instatement or fencing off and exclusion from the licenced site. The caravans remaining at this location should be removed as soon as practicable. On-going checks of ground stability should be scheduled.

The following recommendations are made to address compliance with the site licence and its conditions:

1. The Council should consider inviting the existing site licence holders to submit a new caravan site licence application and site plan.
2. The Council should establish whether the ground conditions at the lower south-eastern part of the licensed site remain suitable for use within a licensed site. This should be determined on the expert advice of a suitably qualified surveyor or civil engineer. Where the ground conditions do not permit its use, the area should be fenced off. Further inspections of ground stability should be carried out on a regular basis.
3. The licence holders should extend or repair the hard standings at the entrances to 4 caravans (detailed in the report).
4. The Council should require the licence holders to provide a new site plan that reflects the site licence conditions and requirements.

5. The Council should remind the licence holders of the requirement to inform the Council and obtain prior approval for any changes.
6. Where the caravan spacing is below the 5 metre and 3.5 metre spacing required by the site licence, the licence holders should re-arrange the caravans in order to ensure that the minimum spacing applies. Where this cannot be achieved by re-alignment, the number of caravans should be reduced accordingly.
7. Verandas fixed to 3 caravans (detailed in the report) should be removed or reduced in size to achieve the required minimum 3.5 metre spacing.
8. The licence holders should repair the site road at the 2 corners of the upper northern part of the site.
9. If a new application is submitted, the Council should consider re-wording the condition on roads to allow a minimum width of 3 metres and of suitable design and construction that allows other materials in addition to a concrete surface.
10. The licence holders should undertake changes to establish a 1metre verge width at the 4 locations identified in this report.
11. The licence holders should repair, and remove the vegetation from, the steps to the lower terraces of the site.
12. If a new application is submitted, the Council should consider re-wording the condition on LPG to restrict usage to propane bottles only.
13. If a new application is submitted, the Council should consider re-wording the condition to remove the requirement for a telephone but still requiring the provision of a sign giving contact arrangements in an emergency.
14. If a new application is submitted, the Council should consider removing the condition requiring toilet facilities as all the caravans have their own facilities.
15. If a new application is submitted, the Council should consider re-wording the condition on car parking, to restrict site users cars to the car parks except for loading and unloading.
16. The recreation space at the lower south-eastern part of the site should be restored if the ground conditions permit (see recommendation 2 above). If a new application is submitted, and the lower part of the site is excluded from the licence, the Council should decide whether the new condition should include a recreation space.
17. The telephone box should be designated as the information point for the site. A copy of the licence together with the conditions and site plan should be placed at the information point together with other relevant information and contact details.

2.0 Scope

Hastings Borough Council through its Head of Environmental Services, Mr M Hepworth, instructed RH Environmental Limited on 13th August 2014 to undertake a compliance audit of the Rocklands Caravan site.

The background information provided confirmed that a licensed caravan site had been in operation at this location for many years. The site licence was issued by Hastings Borough Council under the provisions of the Caravan Sites and Control of Development Act 1960 Section 3.

During the extreme and prolonged wet weather conditions experienced in the winter of 2013/2014 a landslip had occurred on the hillside affecting the lower south-eastern part of the site. A local campaign group raised concerns regarding the landslip and the safe operation of the caravan site. The Council therefore made a decision to commission an independent audit.

The Council also asked the site operators to commission their own survey of the surface water drainage arrangements assessing the adequacy, particularly in the lower section of the site affected by the landslip and the roadway and parking area in that vicinity.

The Council provided:

- A copy of the latest site licence dated 15th March 2012 (copy at Appendix 1)
- A previous licence dated October 1997
- A set of site licence conditions (copy at Appendix 2)
- A site plan (copy at Appendix 3).
- A document submitted by the campaign group that raised concerns about compliance with the site conditions.

The Council authorised Mr Alan Brown to undertake the inspection with regard to the Caravan Sites and Control of Development Act 1960, together with health and safety and public health legislation.

The site visit was arranged for Wednesday 20th August 2014 at 8.00am. Mr R Brown, Hastings Council Licensing Manager met Mr Alan Brown at the gate of the Caravan Site and then proceeded to the main house and introduced Mr Alan Brown to Mr and Mrs Guilliard. At that point Mr R Brown left the site.

The site visit included an interview with Mr and Mrs Guilliard, inspection of documents and a site inspection including a set of measurements and photographs. The visit concluded at 4.00pm.

This report presents the outcome of the audit. It addresses each of the conditions and, where issues regarding compliance were noted, makes recommendations for the consideration of the Council.

Where there are breaches of the conditions, the Caravan Sites and Control of Development Act 1960 section 9 makes this an offence and the Council could take a case to the Magistrates Court. In taking any action, the Council should ensure that they are following the approach set out in its Enforcement Policy. If the Licence holders do not resolve the breaches identified in this report the Council should consider this course of action.

The scope of this report is limited to visual observations of the condition of the site at the time of the visit.

This report is provided for the use of the named client and has been prepared in good faith, with all reasonable skill, care and diligence, limited to the information provided and within the scope of work agreed with the client.

3.0 Site Licence

At the visit Mr and Mrs Guilliard confirmed that they were the persons named on the licence and were responsible for the site.

Mr and Mrs Guilliard agreed that the set of conditions were the current version.

The plan forwarded by the Council (Appendix 3, dated 11/06/2007) was a plan of the site but its purpose was to show the electrical layout. It was therefore not an appropriate 'site plan' as required by the conditions. Mr and Mrs Guilliard were aware of this plan and not aware of any other plan that fitted the condition requirement.

An inspection of the site against this plan indicated that some changes had been made to the pitches since 2007. Mr and Mrs Guilliard confirmed that some changes had been made, removing some pitches, extending some and re-orienting others.

Mr and Mrs Guilliard were asked about the numbering of pitches and as this was complex, for the purposes of the report the pitches were numbered on a sketch plan (Appendix 4). All pitch numbers in this report refer to the numbers in Appendix 4.

Mr and Mrs Guilliard explained that the operation of the site had been rationalised. All the caravans were fully serviced and privately owned. All the caravans were the static type with no tourers permitted at the site. The traffic was therefore essentially limited to cars and the relatively few occasions when Mr and Mrs Guilliard arranged for the removal of old caravans and replacement with new as required.

The restricted operation of the site removed the necessity of the toilet block, which has been converted into a workshop. Limited facilities were retained for staff.

The site conditions were based on the 2008 Model Conditions and were generally appropriate. However, they did not accurately reflect the circumstances found at the site, for example some were framed for a site that would accept touring caravans. It is therefore suggested that the Council invite the licence holders to submit a fresh application in relation to the existing use together with a site plan. A new set of conditions can then be agreed that more accurately reflect the current operation of the site.

The application and a site plan that defines the site boundary will need to take account of the outcome of the ground stability investigations.

It is suggested that the resolution of some of the breaches of the existing licence conditions identified in the report should be not be deferred pending a new application, such as the spacing requirements.

If a new application is not submitted, the Council will need to take a view on the non-compliance with existing conditions such as whether to require wider roads and the reinstatement of the toilet block.

Recommendation: The Council should consider inviting the existing site licence holders to submit a new caravan site licence application and site plan.

4.0 Ground Stability

A landslip had affected the lower south-eastern section of the site. The 2007 plan shows a row of six hard standings on this area. The landslip had resulted in a drop of about 2 metres in the area in front of the hard standings and there was some undermining of the leading edge of the hard standings. Mr Guilliard explained that the area in front of the hard standings was a grassed recreational area.

At the time of the visit there was one caravan sited on the hard standing next to the road (73) and another temporarily sited across the hard standings (74). A temporary road had been installed to facilitate the removal of the caravans from this area. Some had been removed, two were stored on the car park at the corner above this area and another temporarily stored on a hard standing (35).

Mr Guilliard explained that he was in the process of removing these caravans and was going through the necessary legal processes with the owners.

Mr Guilliard also stated that he had employed a surveyor to assess the issues of ground stability to determine the current status of the affected, and surrounding, land.

It is recommended that the remaining two caravans should be removed from this location as soon as practicable.

The Council should determine, by expert review of the licence holders surveyors report or through undertaking their own investigation, whether the ground affected by the landslip can be stabilised and the land re-instated for use as a licensed caravan site. The Council should also ensure that any expert assessment of the landslip includes within its scope an assessment as to whether other parts of the caravan site are at risk, and if so whether remedial works should be required, or whether other sections of the site should be excluded.

The boundary of the site should be clearly defined on the site plan. If the land affected by the landslip and any other areas affected, can be satisfactorily re-instated the Council should consider them remaining within the licensed site boundary. If however the ground conditions are found to be unstable or otherwise unsuitable for use as a licensed caravan site, the affected area(s) of the site should be securely fenced off.

The Council should consider requiring regular on-going expert inspections of the ground stability, possibly on an annual or 18-month frequency. The expert inspection report may provide guidance on the recommended frequency of further inspections.

Recommendation: The Council should establish whether the ground conditions at the lower south-eastern part of the site within the licence

boundary are suitable for the purposes contained in the licence. This should be determined on the expert advice of a suitability qualified surveyor or civil engineer. Where the ground conditions do not permit its use, the area should be fenced off. Further inspections of ground stability should be carried out on a regular basis.

5.0 Condition 1 Winter Closure

The condition requires the closure of the site between 15th January and 1st March when owners are not permitted to stay at the caravans. Mr and Mrs Guilliard stated that the site is closed for this period and they schedule maintenance work for this time. At the visit, when asked, caravan owners clearly understood that the site was closed during this period.

The condition refers to the possibility of winter storage. Mr Guilliard stated that they do not have any winter storage, i.e. no caravans are brought onto the site to be stored over winter. During the inspection, it was considered that there was no space on the site for such an operation and thus unlikely that it was being used for winter storage.

The condition requires that the hard standings extend to the area occupied by the caravan. The site inspection indicated that this was in compliance.

The condition requires a suitable base extending to 1 metre at entrances to the caravans. This was suitably provided in most cases either by the hard standing or the addition of concrete slabs. In 4 locations they were considered unsatisfactory as they were uneven or did not extend a sufficient distance. The areas around the following caravans should be extended or repaired to comply with the condition – Numbers 8, 9, 19, 63.

Recommendation: The licence holders should extend or repair the bases at the entrances to 4 caravans.

6.0 Condition 2 Maximum Number

The condition allows a maximum of 82 caravans. Mr Guilliard stated that the current number was 76. At the visit there were 76 caravans present. There were 72 caravans on hard standings on the main site, one of which was temporarily stored at pitch 35. In addition there were the two on the lower terrace and two on the car park awaiting removal.

If a new application is submitted, the Council should consider the appropriate maximum number to include. The site is limited in size and does not have sufficient space to accommodate 82 static caravans. If the lower south-eastern area remains unusable then a maximum of 72 caravans may be appropriate provided that the minimum spacing requirement can be achieved.

7.0 Condition 3 Definition

All the caravans on the site were caravans that fall within the definition.

8.0 Condition 4 Site Plan

The plan in current use (Appendix 3) did not fulfil the requirements of the condition.

For example, the plan did not include the fire points and refuse points.

The condition mentions waste water disposal points and standpipes. As all the caravans are fully serviced these were not present and therefore not a requirement. It also mentioned 'ablution blocks' that were no longer present.

A site plan should be required from the licence holders. It should include the position of each caravan/hard standing, roads, fire points and refuse points as mentioned in the existing condition.

The site plan should also clearly identify the boundary of the site, within which the licence applies. For example, it was not clear whether the access lane was part of the site.

In addition, the site plan should include the vehicle and pedestrian access points, paths, car parks, recreational areas, the laundry block, information point and the location for inquiries.

The condition also requires that the Council be notified of any changes. It would appear that changes had been made to the site, for example the removal and re-siting of hard standings and the sanitary block being converted to a workshop. However, without an agreed site plan it would be difficult for the Council to enforce this condition.

A site plan that accurately reflects the current circumstances should be provided by the licence holder and agreed by the Council. The Council should mark and date the plan as the 'approved plan' and retain a copy.

The licence holder should be reminded of this condition and required to submit an amended plan for any changes. If in agreement with the changes, the Council should then mark and date the new plan as the 'approved plan' and mark the one replaced as 'cancelled'.

It was noted that the changes made by the licence holders had rationalised the site operations and probably reduced any potential impacts. For example, the changes had reduced the overall number of hard standings.

Recommendation: The Council should require the licence holders to provide a site plan that fulfils the condition requirements.

Recommendation: The Council should remind the licence holders of the

requirement to inform the Council and obtain prior approval for any changes.

9.0 Condition 5 Waste

(a) No waste water discharges onto ground were observed during the inspection. Each caravan was fully serviced with mains water and drainage connections. The waste water is drained to a sump at the bottom eastern corner of the site (Mr Guilliard stated that it was installed in 2012). The waste is then macerated and pumped to the main sewer. The waste water pump has warning lights to indicate malfunction. Mr and Mrs Guilliard stated that the pump was regularly serviced and they had a 24 hour a day call out arrangement. At the time of the visit the pump was in operation and the system was working effectively.

(b) The site was maintained in a good condition. It was in a tidy state and there were no obstructions for vehicles or problems for pedestrians wanting to move around the site.

10.0 Condition 6 Density

All the caravans on the site had metal cladding and therefore the 5 metre spacing requirement was applied with 3.5 metres at corners.

Measurements were made to establish the spacing between caravans (see Appendix 5). In 17 locations the spacing was below the 5 metre requirement (highlighted in red). The general trend with static caravans has been one of increasing size. Therefore as caravans have been replaced on the site this appeared to have resulted in a number of pinch points where the spacing became inadequate. In most cases this can be corrected by re-alignment. However, where this cannot be achieved by re-alignment the number of pitches should be reduced to enable the correct spacing.

The spacing between 34 and 35, 35 and 36 was inadequate. However, it was noted that the caravan on 35 had been temporarily stored at the location pending removal.

In one terraced location in the centre of the site, the spacing between the roofs of 2 caravans (51 and 52) and the front of the caravans above (47 and 48) was below 3.5 metres. The caravans should be moved to provide a minimum 3.5 metre spacing at this location.

Porches met the condition requirement. There were no car ports or covered walkways.

There were verandas present on a small number of caravans. The edge of the verandas of 3 caravans were recorded at less than 3.5 metre spacing. These verandas need to be removed or reduced in size to enable the correct spacing. These are highlighted in red in Appendix 5.

External storage was restricted to containers specified in the caravan

ownership agreement and these complied with the site licence conditions.

The site was fully occupied with no evident space to accommodate more caravans. The current lay-out needs to be re-arranged to enable the 5 metre spacing and a reduction in pitches may be necessary if larger caravans are to be accommodated in the future. The requirement for a 1 metre verge should also be taken into consideration with the re-alignment of caravans (see comments under Condition 7).

Recommendation: Where the spacing is below the 5 metre and 3.5 metre requirements, the licence holders should re-arrange the caravans in order to ensure that the minimum spacing applies. Where this cannot be achieved by re-alignment the number should be reduced accordingly.

Recommendation: The verandas at 3 caravans should be removed or reduced in size to enable the required 3.5 metre spacing.

11.0 Condition 7 Roads

The roads were generally in a good condition and afforded good access to the caravans.

The road surface was breaking up at two corners at the top (north) of the site and required repair.

At some locations the road width was measured at less than the 3.7 metres required by the conditions. However, if a new application is submitted, it is suggested that this condition be re-worded. The condition as written would be appropriate if tourers were allowed and needed to manoeuvre around the site. However, site movements are essentially restricted to cars travelling to the car parks, loading and unloading. The current roads were adequate for this purpose and a width of 3 metres was sufficient.

The footpaths and access to the laundry are compliant with the condition.

Some of the steps to the lower terraces were in a poor condition with weeds growing across the steps.

In 4 locations there were caravans that were closer than 1 metre to the verge. At the location by caravans 38, 9 and 10, where the tarmac is across a wide area, this may be resolved by placing lines on the road to distinguish the road from the verge. In the other locations, by caravans 13, 30 and 24, the caravans should be re-aligned. This needs to be undertaken so that the minimum 5 metre and 3.5 metre spacing requirement is also maintained.

The road construction was a mix of concrete and asphalt. The condition as worded mentions concrete but, if a new application is submitted, could be re-worded to reflect alternative acceptable forms of design and construction.

The removal of the temporary road at the bottom of the site should be addressed once the details of the ground conditions and the future use of this

location is determined.

The roads were laid to falls. Mr Guilliard stated that drains were connected to soakaways at the top of the site. No evidence of ponding or flooding was noticed at the time of the visit. There was no rainfall during the visit period and therefore it was not possible to observe any surface water flow.

Lamps on lighting columns were present through the site. The visit occurred in the daytime so the adequacy of the lighting was not assessed.

There were no obstructions on the roads.

Recommendation: The licence holders should repair the road at the 2 northern corners of the upper part of the site.

Recommendation: If a new application is submitted, the Council should consider re-wording the condition on roads to allow a minimum width of 3 metres and of suitable design and construction that allows other materials in addition to a concrete surface.

Recommendation: The licence holders should undertake changes to enable the 1 metre verge to be re-established in the 4 locations identified.

Recommendation: The licence holders should repair, and remove the vegetation from, the steps to the lower terraces.

12.0 Condition 8 Access

The access arrangements met the requirements of the condition.

13.0 Conditions 9 to 15 Fire

Mr and Mrs Guilliard stated that they had an annual inspection from a specialist fire protection company that checked the equipment at the site. I was shown copies of the fire reports from previous years, the last being dated 23rd August 2013 by JS Fire Protection Limited. The report did not identify any problems. This years' inspection is due.

Fire Points were located across the site within the maximum distance and clearly labelled. Fire points with extinguishers were contained in a housing.

The fire equipment included hose reels. These were clearly labelled. There were no standpipes.

Extinguishers and fire sounders were provided. Fire Notices were evident.

14.0 Condition 16 Hazards

The land around caravans was tidy with the grass cut short.

15.0 Condition 17 LPG

Each caravan had 2 externally located propane cylinders. There were no storage tanks at the site.

If a new application is submitted, the Council may wish to re-word the condition as the guidance mentioned was out of date. The Health and Safety Executive reference the codes of practice produced by the LP Gas Association, UKLPG. Storage is covered by Code of Practice Number 7. A re-worded condition could be simplified to restrict the LPG at the site to propane cylinders, thus enabling the removal of the references to tanks, and compliance with the Code of Practice.

The UKLPG User Information Sheet 028 'Safe Use of Propane and Butane Cylinders, Appliances and Equipment' provides relevant advice for these situations.

Recommendation: If a new application is submitted, the Council should consider re-wording the condition on LPG to restrict usage to propane bottles only.

16.0 Condition 18 Telephone

The telephone box on the site did not have a working telephone and was used as an information point.

If occupiers require a telephone they would need to call at the house. As site occupiers will tend to use mobile phones the on-going requirement of this condition is questionable.

Recommendation: If a new application is submitted, the Council should consider re-wording the condition to remove the requirement for a telephone but still requiring the provision of a sign giving contact arrangements in an emergency.

17.0 Conditions 19 to 21 Electrical Installations

Mr and Mrs Gilliard stated that they used a qualified electrician to check the site and undertake electrical work. I was shown copies of electrical condition reports, the most recent from TM Brown Electrical Limited, NICEIC, dated 11th July 2014. The report only identified a few minor items of maintenance.

18.0 **Condition 22 Water**

All caravans were fully serviced. There were no standpipes.

19.0 **Condition 23 Sanitation**

There were no toilet facilities apart from those available for staff. As the caravans were fully serviced, the requirement was deemed unnecessary and the toilet block replaced by a workshop.

There were no catering or leisure services provided at the site.

Recommendation: If a new application is submitted, the Council should consider removing the condition requiring toilet facilities as all the caravans have their own facilities.

20.0 **Condition 24 Chemical Closets**

All caravans were fully serviced. There was therefore no requirement for chemical waste disposal.

21.0 **Condition 25 Laundry**

The laundry room has 2 deep sinks, a large washing machine and drier. This was adequate for the site usage. It was in a clean and tidy condition.

22.0 **Condition 26 Drainage**

All caravans were serviced. The services at vacant hard standings were capped off.

23.0 **Condition 27 Refuse**

Refuse points were suitably located across the site and consisted of wheeled bins for recycling and household waste. They were maintained in a tidy condition.

24.0 **Conditions 28 and 29 Car Parking**

Cars were not parked adjacent to caravans but only within car parking areas. No plastic or wooden boats were seen at the site. The concrete and asphalt construction of the car park surfaces was compliant.

If a new application is submitted, it is suggested that condition 28 be re-worded. As written it allows cars to be parked adjacent to caravans, whereas the operating requirement to restrict cars to car parks is preferable.

Recommendation: If a new application is submitted, the Council should consider amending the condition on car parking, to restrict cars to the car parks except for loading and unloading.

25.0 Condition 30 Recreation Space

The recreation space was not accessible due to the landslip. The reinstatement will depend on the outcome of the ground survey.

Mr and Mrs Guilliard questioned the requirement as they stated that few children are present at the site due to the way it is currently occupied. No children were noticed at the site during the site visit.

Recommendation: The recreation space at the lower south-eastern part of the site should be restored if the ground conditions permit. If a new application is submitted, and the lower part of the site is excluded from the licence, the Council should decide whether the new condition should include a recreation space.

26.0 Condition 31 Emergency

Mr and Mrs Gilliard kept a well-stocked first aid kit inside the front door of the house. It would be useful to place a sign at the information point to address actions to be taken in an emergency.

27.0 Condition 32 Licence

A copy of the site licence was not on display.

Recommendation: The telephone box should be designated as the information point for the site. A copy of the licence together with the conditions and site plan should be placed at the information point together with other relevant information and contact details.

28.0 Conclusion

Rocklands was a well-organised caravan park. The operation had been rationalised to only provide owned and fully serviced static caravans.

The site licence conditions remained generally applicable but if a new application is submitted, could be re-worded to more accurately reflect the current site operation. A suitable site plan should be required.

There are breaches of the existing conditions that should be addressed by the licence holders. The licence holders should also be reminded of the requirement to notify and gain approval from the Council for any changes.

The landslip had affected the site operation at the lower south-eastern part of the site. The stability of this and the surrounding land should be fully assessed and the land either re-instated or fenced off depending on the outcome of the findings. The caravans remaining at this location should be removed as soon as practicable. On-going checks of ground stability should be scheduled.

Recommendations are included in the report to address these matters and ensure compliance with the licence and its conditions.

Appendix 1



CARAVAN SITE AND CONTROL OF DEVELOPMENT ACT, 1960

SECTION 3

SITE LICENCE

TO Mr Leonard George Guilliard, Mrs Joan Maureen Guilliard & Mr Stuart Victor Guilliard

WHEREAS on the **28th day of August 1997**, you made an application for a site licence in respect of land situate at **ROCKLANDS, ROCKLANDS LANE, HASTINGS, TN35 5DY** (hereinafter called "the said land")

AND WHEREAS you are entitled to the benefit of permission (Ref No 49/173 (A-D), 58/48/571, 61/357) for the use of the said land as a caravan site granted under Part III of the Town and Country Planning Act, 1971, otherwise than by a development order

NOW THEREFORE the HASTINGS BOROUGH COUNCIL

HEREBY GRANT a site licence in respect of the said land pursuant to Section 3 of the Caravan Sites and Control of Development Act, 1960 subject of the following conditions, that is to say, **the conditions attached hereto and marked "these are the conditions attached to Site Licence" - SEE OVER**

Dated this 15th day of March 2012

.....

Authorised Officer

Environmental Services Directorate

Aquila House, Breeds Place

Hastings, East Sussex TN34 3UY

**IT IS IMPORTANT THAT YOU SHOULD READ THE NOTES PRINTED ON THE BACK
OF THIS FORM**

NOTES

It is provided by the Caravan Sites and Control of Development Act, 1960, as follows:-

Appeal to magistrates' court against conditions attached to site licence.

7. (1) Any person aggrieved by any condition (other than the condition referred to in subsection (3) of section five of this Act) subject to which a site licence has been issued to him in respect of any land may, within twenty eight days of the date on which the licence was so issued, appeal to a magistrates' court acting for the petty sessions area in which the land is situated; and the court, if satisfied (having regard amongst other things to any standards which may have been specified by the Minister under subsection (6) of the said section five) that the condition is unduly burdensome, may vary or cancel the condition.

(2) In so far as the effect of a condition (in whatever words expressed) subject to which a site licence is issued in respect of any land is to require the carrying out on the land of any works, the condition shall not have effect during the period within which the person to whom the licence is issued is entitled by virtue of the foregoing subsection to appeal against the condition nor, thereafter, whilst an appeal against the condition is pending.

Provisions as to breaches of condition

9. (1) If any occupier of land fails to comply with any condition for the time being attached to a site licence held by him in respect of the land he shall be guilty of an offence and liable on summary conviction, in the case of the first offence to a fine not exceeding one hundred pounds, and, in the case of a second or subsequent offence, to a fine not exceeding two hundred and fifty pounds.

(2) Where a person convicted under this section for failing to comply with a condition attached to a site licence has on two or more previous occasions been convicted there under for failing to comply with a condition attached to that licence, the court before whom he is convicted may, if an application in that behalf is made at the hearing by the local authority in whose area the land is situated, make an order for the revocation of the said licence to come into force on such date as the court may specify in the order, being a date after the end of the period of fourteen days mentioned in subsection (1) of section eight four and subsection (2) of section eighty seven of the Magistrates' Courts Act 1952, as the period within which the person convicted may bring an appeal, whether by case stated or otherwise; and if before the date so specified an appeal is so brought the order shall be of no effect pending the final determination or withdrawal of the appeal.

The person convicted or the local authority who issued the site licence may apply to the magistrates' court which has made such an order revoking a site licence for an order extending the period at the end of which the revocation is to come into force, and the magistrates' court may, if satisfied that adequate notice of the application has been given to

the local authority or, as the case may be, the person convicted, make an order extending that period.

(3) Where an occupier of land fails within the time specified in a condition attached to a site licence held by him to complete to the satisfaction of the local authority in whose area the land is situated any works required by the condition to be so completed, the local authority may carry out those works, and may recover as a simple contract debt in any court of competent jurisdiction from that person any expenses reasonably incurred by them in that behalf.

Transfer of site licences and transmission on death, etc.

10. (1) When the holder of a site licence in respect of any land ceases to be the occupier of the land, he may, with the consent of the local authority in whose area the land is situated, transfer the licence to the person who then becomes the occupier of the land.

(2) Where a local authority give their consent to the transfer of a site licence, they shall endorse on the licence the name of the person to whom it is to be transferred and the date agreed between the parties to the transfer as the date on which that person is, for the purposes of this Part of this Act, to be treated as

having become the holder of the licence.

(3) If an application is made under subsection (1) of this section for consent to the transfer of a site licence to a person who is to become the occupier of the land, that person may apply for a site licence under section three of this Act as if he were the occupier of the land, and if the local authority at any time before issuing a site licence in compliance with that application give their consent to the transfer they need not proceed with the application for the site licence.

(4) Where any person becomes, by operation of law, entitled to an estate or interest in land in respect of which a site licence is in force and is, by virtue of his holding that estate or interest, the occupier of the land within the meaning of this Part of this Act he shall, for the purposes of this Part of this Act, be treated as having become the holder of the licence on the day on which he become the occupier of the land, and the local authority in whose area the land is situated shall, if an application in that behalf is made to them, endorse his name and the said date on the licence.

Appendix 2

CARAVAN SITES AND CONTROL OF DEVELOPMENT ACT 1960

Static Caravan Holiday Site Licence Conditions

A GENERAL CONDITIONS

1. No caravan not on a hard standing as specified hereunder shall be stationed on any part of the said land between 15 January and the 1st March in that year except in an area approved in writing by the Council as a winter storage area and no caravan stationed on the land shall be used for the purposes of human habitation between those dates. Such hard standing of a suitable material shall extend over the whole area occupied by the caravan placed upon it and should project not less than one metre outwards from the entrance or entrances of the caravan.
2. Not more than 82 caravans shall be stationed on the said land at any one time.
3. There shall be stationed on this land only caravans that fall into the definition of caravan under the Caravan Sites & Control of Development Act 1960 section 29 sub-section 1, and the Caravan Sites Act 1968, Section 13.
4. A plan of the layout of the said land showing the position of the caravans, ablution blocks, fire points, roads, refuse points, waste water disposal points and standpipes must be deposited with the Council when making an application for a site licence.

None of the items listed above shall be moved, added to or removed on the said land without the submission of a revised layout plan of the site to the Council and the written approval of the Council being obtained.

5. The occupier shall take all such steps as may be open to him to secure compliance with the conditions of this licence by all persons permitted at any time to enter upon the said land and shall also ensure that -

(a) no waste water is discharged on the ground;

- (b) the said land is left free from refuse and litter and in a clean, tidy and sanitary condition so that the circulation of vehicles and pedestrians is not impeded by reason of mud or otherwise.

B DENSITY AND SPACE BETWEEN CARAVANS

6. Subject to the following variations, the minimum spacing distance between caravans made of aluminium or other materials with similar fire performance properties shall be not less than 5 metres between units, 3.5 metres at the corners. For those with a plywood or similar skin it shall be not less than 6 metres. Where there is a mixture of holiday caravans of aluminium and plywood, the separation distance shall be 6 metres, and where there is a mixture of permanent residential homes and holiday caravans, the separation distance should again be 6 metres. The point of measurement for porches etc is the exterior cladding of the caravan.

Porches may protrude 1m into the 5 metres and should be of the open type.

Where there are ramps for the disabled, verandas and stairs extending from the unit, there shall be 3.5m clear space between them (4.5m if mixture of caravans)(and such items shall not face each other in any space. If they are enclosed, they may need to be considered as part of the unit and, as such, should not intrude into the 5m (or 6m) space.

A shed, a covered storage space or an enclosed porch may be permitted between units only if it is of non-combustible construction (including non-combustible roof) and sufficient space is maintained around each unit so as not to prejudice means of escape in case of fire. Windows in such structures shall not face towards the unit on either side. Car ports and covered walkways shall in no circumstances be allowed within the 5 or 6 metre space. Any existing sheds, covered storage spaces or enclosed porches not so constructed shall be replaced with structures complying with this standard within twelve months.

The density should be consistent with safety standards and health and amenity requirements. The gross density shall not normally exceed 60 caravans to the hectare, except that this figure may vary with planning consent for new and enlarged sites, calculated on the basis of the useable area (ie excluding lakes, roads, communal services and other areas unsuitable for the siting of caravans) rather than the total site area.

C ROADS AND FOOTPATHS

7. Roads of suitable material shall be provided so that no caravan standing or toilet block is more than forty five metres from a road. Each laundry block and toilet block shall be connected to a carriageway by a footpath with a hard surface. Carriageways shall be not less than 3.7 metres wide or if they form part of a one way traffic system 3 metres wide. A verge with a minimum width of 1 metre should be provided on either side of the carriageway. Carriageway widths should be increased on bends to facilitate safe turning by the largest size of vehicle which will normally use the road. Footpaths shall be not less than 0.75m wide. The road surface shall be laid to suitable falls to facilitate the run-off of surface water and positive drainage shall be provided where necessary to prevent ponding or flooding of adjacent property.

Existing roads which do not comply with this may be accepted by the Council in writing, but must be upgraded to the new Standard during any maintenance, repair or replacement programme.

Except where the Council may give prior approval in writing to some other method of construction roads shall be formed from a concrete slab resting on a compacted granular sub-base.

The thickness of road construction required will vary depending on the nature of the sub-soil and the volume of weight of traffic using the road and to determine the necessary thickness the general principles laid down in guide notes should be followed. The minimum permissible construction thicknesses are:-

Granular sub-base	80mm
Concrete road slab	150mm

All organic material, top soil and soft sub-soil shall be removed from the area of the carriageway or footpath and the formation trimmed to facilitate a uniform construction thickness. Other suitable methods of construction may be acceptable with prior

written agreement of the local authority.

Each footpath shall be constructed of concrete slabbing of not less than 75mm thickness laid on a granular sub-base not less than 50mm thickness.

Expansion and contraction joints shall be provided in the concrete slabs at suitable intervals and the minimum compressive strength of the concrete at 28

days shall be 28 Newtons per square millimetre.

All details of the road construction including gradients, crossfalls, drainage details, materials for construction and workmanship shall be to the satisfaction of the Council.

Each road and footpath shall be maintained in good condition and repair, they shall be suitably lit and emergency vehicle routes must be kept clear of obstruction at all times.

There shall be adequate surface water drainage for carriageways, footpaths and paved areas for the site generally and details shall be to the satisfaction of the Council. It should be noted that the permission to the Southern Water Authority may need to be obtained for the discharge of surface water to, diversion, or culverting of a watercourse or stream.

8. Access to Sites

- (i) Vehicular access together with any necessary visibility splay shall be proceeded and maintained to the satisfaction of and in accordance with approvals of the Council.

- (ii) Passing places for traffic using any single track private access way or drive to a caravan (over 100 metres in length) site shall be provided and maintained as in (i) above.

D FIRE FIGHTING APPLIANCES

9. Fire Points

These should be established so that no caravan or site building is more than 30 metres from a fire point. They should be housed in a weatherproof structure, easily accessible and clearly and conspicuously marked "FIRE POINT".

10. Fire Fighting Equipment

Where water standpipes are provided and there is a water supply of sufficient pressure and flow to project a jet of water approximately 5 metres from the nozzle, such water standpipes shall be situated at each fire point. There shall also be a reel that complies with British Standard 5306 Part 1 with a hose not less than 30 metres long, having a means of connection to a water standpipe (preferably a screw thread connection) with a water supply of sufficient

pressure and terminating in a small hand control nozzle. Hoses shall be housed in a box painted red and marked "HOSE REEL".

11. Where standpipes are not provided but there is a water supply of sufficient pressure and flow, fire hydrants shall be installed within 100 metres of every caravan standing. Hydrants should conform to British Standard 750. Access to hydrants and other water supplies should not be obstructed or obscured.

Where standpipes are not provided or the water pressure or flow is not sufficient, each fire point shall be provided with either water extinguishers (2 x 9 litre) or a water tank of at least 500 litres capacity fitted with a hinged cover, 2 buckets and 1 hand pump or bucket pump.

12. Fire Warning

A means of raising the alarm in the event of a fire shall be provided at each fire point. This could be by means of a manually operated sounder, eg metal triangle with a striker, gong or hand operated siren.

13. Maintenance

All alarm and fire fighting equipment shall be installed, tested and maintained in working order by a competent person and be available for inspection by, or on behalf of, the licensing authority. A log book should be kept to record all tests and any remedial action.

14. All equipment susceptible to damage by frost shall be suitably protected.

15. Fire Notices

A clearly written and conspicuous notice shall be provided and maintained at each fire point to indicate the action to be taken in case of fire and the location of the nearest telephone. This notice shall include the following -

"On discovering a fire

- (i) ensure the caravan or site building involved is evacuated;
- (ii) raise the alarm;
- (iii) call the fire brigade (the nearest telephone is sited at);

- (iv) attack the fire using the fire fighting equipment provided, if safe to do so.

It is in the interest of all occupiers of this site to be familiar with the above routine and the method of operating the fire alarm and fire fighting equipment."

16. Fire Hazards

Long grass and vegetation shall be cut at frequent and regular intervals where necessary to prevent it becoming a fire hazard to caravans, buildings or other installations on the site. Any such cuttings shall be removed from the vicinity of caravans. The space beneath and between caravans shall not be used for the storage of combustible materials.

17. Storage of Liquefied Petroleum Gas (LPG)

LPG storage supplied from tanks shall comply with Guidance Booklet HSG 34 "The Storage of LPG at Fixed Installations" or, where LPG is supplied from cylinders, with Guidance Note CS4 "The Keeping of LPG in Cylinders and Other Containers" as appropriate.

Where there are metered supplies from a common LPG storage tank, then Guidance Note CS11 "The Storage and Use of LPG at Metered Estates" provides further guidance. In this case and where a British Gas mains supply is available, then the Gas Safety (Installation and Use) Regulations 1984 and the Pipe-lines Act 1962 may also be applicable.

Exposed gas bottles or cylinders shall not be within the separation boundary of an adjoining unit.

LPG installations shall conform to British Standard 5482, "Code of Practice for domestic butane and propane gas burning installations, Part 2: 1977 Installations in Caravans and non-permanent dwellings." For main gas supply, the 1984 Regulations will be relevant for the installation downstream of any service pipe(s) supplying any primary meter(s) and such service pipes are subject to the Gas Safety Regulations 1972.

In cases where the site owner supplies gas to caravans on the site, he may need an authorisation to do so from OFGAS under the Gas Act 1986.

18. Telephones

A telephone shall be available on the site for calling the police, fire brigade, ambulance or other services in an emergency. A notice by the telephone should include the name and address of the site.

E ELECTRICAL INSTALLATIONS

19. Sites shall be provided with an electricity supply sufficient in all respects to meet all reasonable demands of the caravans situated on them.

20. Such electrical installations other than Electricity Board works and circuits subject to regulations made by the Secretary of State under Section 16 of the Energy Act 1983 and Section 64 of the Electricity Act 1947, shall be installed, tested and maintained in accordance with the provisions of the Institution of Electrical Engineers' (IEE) Regulations for Electrical Installations for the time being in force, and where appropriate, to the standard which would be acceptable for the purposes of the Electricity (Overhead Lines) Regulations 1988 Statutory Instrument 1988 No. 1057.

21. Work on electrical installations and appliances shall be carried out only by competent persons such as the manufacturer's appointed agent, the electricity supplier, a professionally qualified electrical engineer, a member of the Electrical Contractors' Association, a contractor approved by the National Inspection Council for Electrical Installation Contracting, or a qualified person acting on behalf of one of the above. The installations shall be inspected periodically: under IEE Wiring Regulations, every year or such longer period (not exceeding 3 years) as is considered appropriate in each case. When an installation is inspected it shall be judged against the current regulations.

The Inspector will within 1 month of such an inspection, issue an inspection certificate in the form prescribed in the IEE Wiring Regulations which should be retained by the site operator and displayed, supplemented or replaced by subsequent certificates, with the site licence. The cost of the inspection and report shall be met by the site operator or licence holder.

If an inspection reveals that an installation no longer complies with the regulations extant at the time it was first installed, any deficiencies shall be rectified. Any major alterations and extensions to an installation and all parts of the existing installation affected by them shall comply with the latest version of the IEE Wiring Regulations.

If there are overhead electric lines on the site, they must be at a minimum

height of 4.5 metres and suitable warning notices shall be displayed at the entrance to the site and on supports for the line. Where appropriate, particular attention should be drawn to the danger of masts of yachts or dinghies contacting the line.

F WATER SUPPLY

22. A constant and sufficient supply of wholesome drinking water shall be made available on the said land in accordance with the following requirements during any period in which any caravan is stationed on the said land for the purposes of human habitation -
- (a) the supply shall comply with the appropriate water byelaws and statutory quality standards;
 - (b) each caravan standing shall be supplied with a piped water supply or, alternatively, water standpipes with an adequate supply of water shall be situated not more than 18 metres from any standing except when the density of caravans is less than 30 per hectare when the distance shall be 55 metres;
 - (c) adequate provision shall be made for the drainage of all waste water from each standpipe to a drain connected to a public sewer or other means of drainage approved by the Council.

G DRAINAGE, SANITATION AND WASHING FACILITIES

23. (a) Separate toilet facilities for each sex shall be provided and maintained at all times to the satisfaction of the Council on the said land in accordance with the following scales and in a permanent building erected in accordance with plans and specifications previously approved by the Council in writing. Where all or a proportion of the caravans on the site are fully serviced a proportionate reduction in these requirements may be agreed, in writing, by the Council.

Male	WCs	1 per 15 caravans
	Urinals	1 per 15 caravans
	Wash basins	1 per 15 caravans

Shower or bath 1 per 20 caravans

Female WCs 2 per 15 caravans

Wash basins 1 per 15 caravans

Shower or bath 1 per 20 caravans

- (b) Toilet facilities required by the foregoing standard shall be distributed and situated so that no caravan used on the said land at any time for the purposes of human habitation is situated more than 90 metres from such facilities for each sex.
 - (c) Each wash basin to be provided with a constant supply of hot and cold water at all times.
 - (d) Each bath or shower to be provided with a constant supply of hot and cold water at all times.
 - (e) Each WC and urinal to be provided with a constant supply of water for flushing purposes.
 - (f) Satisfactory provision shall be made for foul drainage either by connection to a public sewer or other means of drainage; approval by the Council is required in either situation.
 - (g) Any facilities provided in conjunction with catering and leisure services on the site shall be provided in accordance with the local authority's standards adopted under the provisions of the Local Government (Miscellaneous Provisions) Act 1982.
24. Properly designed disposal points for the contents of chemical closets shall be provided and properly maintained. Each disposal point shall be properly drained and provided with an adequate supply of water. No caravan shall be more than 90 metres from a disposal point.
25. Laundry facilities shall be provided in a separate room on the scale of not less than one deep sink with constant hot and cold water or other suitable facility as agreed by the local authority in writing per 30 caravans. No caravan to be situated more than 180 metres from any laundry facility.

26. For caravans having their own water supply and water closet each caravan standing shall be provided with a connection to the foul drainage system. The connection shall be capable of being made airtight when not in use.

H REFUSE DISPOSAL

27. Every caravan standing shall have an adequate number of suitable non-combustible refuse bins with close-fitting lids or plastic bags. Arrangements should be made for the bins to be emptied regularly.

Where communal refuse bins are also provided these shall be of similar construction and housed within a properly constructed bin store.

I CAR PARKING

28. One car only may be parked between adjoining caravans provided that the door to the caravan is not obstructed. Suitably surfaced parking spaces shall be provided where necessary to meet the additional requirements of the occupants and their visitors. Plastic or wooden boats shall not be parked between units.
29. Each surfaced car park shall be directly accessible from the road and shall conform to the same construction and conditions as for roads under Condition C7.

J RECREATION SPACE

30. Where children stay on the site, space equivalent to about one tenth of the total area should be allocated for children's games and/or other recreational purposes. This provision will normally be necessary because of the limited space available around the caravans. It may however be omitted by prior agreement of the local authority in writing where there are suitable alternative publicly provided recreational facilities which are readily accessible.

K EMERGENCY SERVICES

31. A comprehensive first aid kit must be kept and be available at all times. Notices must be displayed prominently on the site indicating what action is to

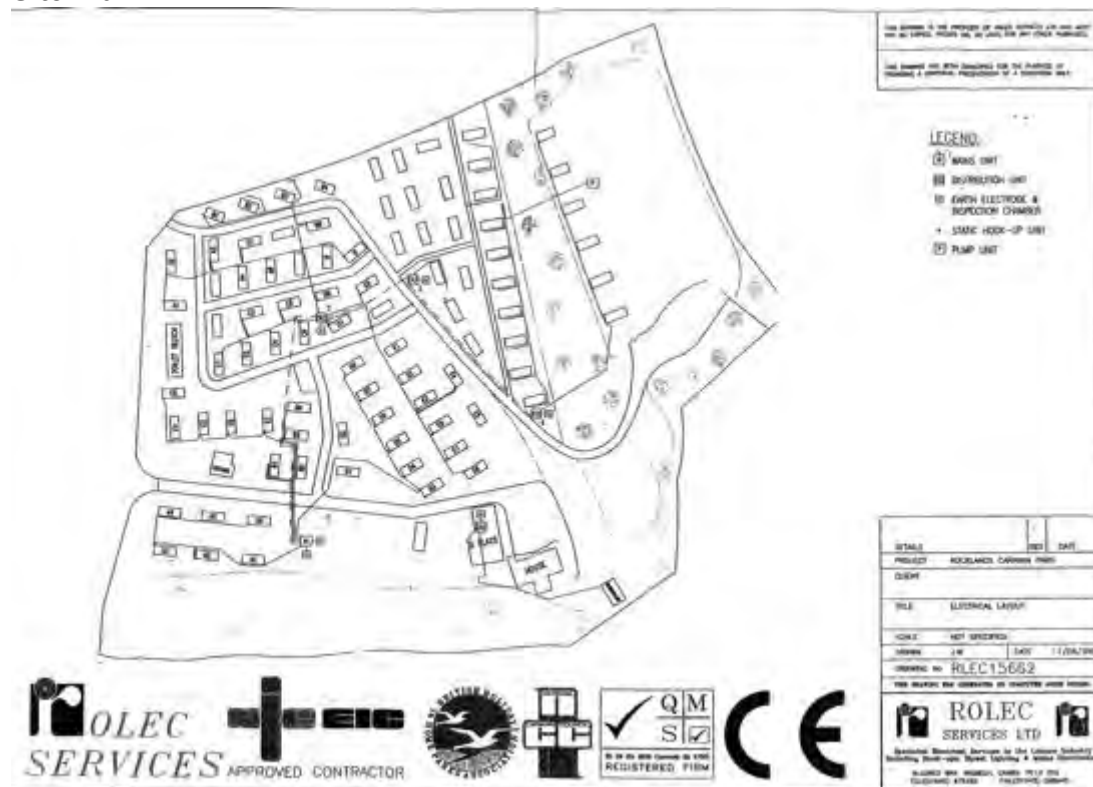
be taken in case of emergency and show where the police, fire brigade, ambulance, local doctors and the Director of Environmental Services Officer can be contacted. Details of these services must be supplied to each arrival on the site. At sites subject to flood risk, warning notices should be displayed giving advice about the operation of the flood warning system.

L LICENCE

32. At all times when caravans are stationed on the said land for the purposes of human habitation a copy of this licence and these conditions shall be on display on the said land in a conspicuous place behind a transparent cover sufficient to protect the notice from the weather.

Appendix 3

Site Plan



Appendix 4

Sketch of Site with Numbering at 20th August 2014



Appendix 5

Spacing between caravans

Measurements in metres

1 and 2	4.90
1 and 6	6.65
2 and 3	4.28
2 and 5	7.54
3 and 4	6.80
4 and 5	6.10
5 and 6	5.10
6 and 7	7.40
7 and 8	5.80
7 and 9	4.75
7 and 11	4.60 corner to corner
8 and 9	6.06
9 and 10	5.75
10 and 11	5.25
11 and 19	8.00+
11 and 12	5.02 veranda spacing 3.30
12 and 13	5.80
13 and 14	5.45
14 and 15	5.45
15 and 18	7.00
16 and 17	4.50 veranda spacing 2.70
16 and 34	5.50
17 and 31	8.00+
18 and 19	5.00
18 and 30	7.80
19 and 29	8.00
19 and 20	4.90 veranda spacing 3.15
20 and 28	6.70
20 and 21	4.80

21 and 27	7.80
21 and 22	3.60 corner to corner
21 and 23	4.61
22 and 23	6.15
22 and 25	3.80 corner to corner
22 and 26	4.30 corner to corner
23 and 24	5.25
23 and 39	8.00
24 and 25	4.60
24 and 50	8.00
25 and 26	5.40
26 and 27	6.20
26 and 33	5.00
26 and 54	8.00
27 and 28	4.90
27 and 33	4.85
28 and 29	4.72
28 and 32	4.50 corner to corner
28 and 33	5.60
29 and 30	4.80
29 and 32	5.70
30 and 31	5.00
31 and 32	4.60
31 and 34	6.40
32 and 33	5.00
32 and 35	7.00
33 and 36	8.00
34 and 35	4.00 temporary storage at 35
35 and 36	3.30 temporary storage at 35
36 and 53	6.40
37 and 38	5.50
37 and 43	7.00
38 and 40	4.70

38 and 41	5.10
39 and 40	5.20
40 and 41	5.50
41 and 42	5.90
42 and 43	5.35
43 and 44	4.45
45 and 46	5.10
46 and 47	5.30
47 and 48	5.50
47 and 52	3.00 front to roof
48 and 49	5.20
48 and 51	3.00 front to roof
49 and 50	5.40
51 and 52	5.00
53 and 54	8.00
53 and 55	6.00+
55 and 56	5.10
56 and 57	5.30
57 and 58	4.90
58 and 59	4.80
60 and 61	5.90
61 and 62	8.00
63 and 64	6.15
64 and 65	5.30
65 and 66	5.60
66 and 67	5.40
67 and 68	6.20
68 and 69	6.20
69 and 70	5.90
70 and 71	6.20
71 and 72	6.00

Appendix 6

Photographs



Space between 2 and 3



Space between 1 and 2



Uneven base at entrance 8



Space between 7 and 9



Uneven base at entrance 9



Veranda between 11 and 12



Space between 20 and 21



Space and veranda between 16 and 17



Space between 21 and 23



Space between 29 and 30



Space between 28 and 29



Space between 27 and 28



Space between 31 and 32



Space between 34 and 35



Space between 35 and 36



Space between 57 and 58



Space between 58 and 59



Entrance base at 63



Lower section affected by landslip 73 and 74



Caravans stored on lower car park



Space between 47 and 52



Spacing between 43 and 44



Fire Extinguisher 10



Laundry, Fire Point, Refuse Point



Refuse Point at Workshop



Steps to Lower terraces



Caravans next to verge 38 and 9



Road requiring repair



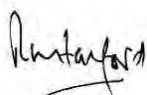
Entrance road

The site visit was undertaken and the report was prepared by
Alan Brown BSc. CMCIEH



A G Brown

The report was approved by R Halford BSc, MSc, MCIEH



R Halford

29 August 2014

Date