

Contact: Susan Clowes  
Telephone: (01524) 582740  
Fax: (01524) 582709  
E-mail: sclowes@lancaster.gov.uk  
Website: www.lancaster.gov.uk  
Our reference: R:212136  
Your reference:

## APPENDIX 1

Mr Richard Hill  
Britaniacrest Ltd  
304 Oxcliffe Road  
Heaton With Oxcliffe  
Morecambe  
LA3 3EJ

### Environmental Health Services

### Suzanne Lodge Chief Officer (Health and Housing)

Morecambe Town Hall  
Marine Road East  
MORECAMBE  
LA4 5AF

Date: 2 September 2015

Dear Sirs,

### **CARAVAN SITES AND CONTROL OF DEVELOPMENT ACT 1960 BROADFIELDS CARAVAN PARK, 276 OXCLIFFE ROAD, HEATON WITH OXCLIFFE, MORECAMBE, LA3 3EH**

I write to confirm the matters discussed at the meeting of 24 July 2015 held at the Britaniacrest offices on Oxcliffe Road, Morecambe, which was attended by Richard Hill (Director, Britaniacrest Ltd), Phil Jenkinson (Director, Wyre Surfacing), Nick Howard (Environmental Health Manager, Lancaster City Council) and myself. The purpose of the meeting was to discuss licensing issues and concerns being raised by the council relating to Broadfields Caravan Park, 276 Oxcliffe Road, Morecambe LA3 3EH (which subsequently in this letter is referred to as 'the Park').

#### **Drainage / flooding problems**

Over the last few years Lancaster City Council has received numerous complaints from residents of the park relating to their toilets and showers backing up after periods of intense or sustained rainfall, leaving them with limited access to essential facilities for periods of time. Reports have also been received of residents having to wade through ponded surface water to access caravans. Although Britaniacrest Ltd has taken some action to resolve the issues on each of these occasions, a longer-term and more proactive solution is needed.

Prior to the meeting the council officers had been supplied with a copy of the CCTV report of the drainage system dated 11/06/15, carried out by Drain Doctor on behalf of Britaniacrest. This reported a build-up of fat inside the pipes and a failed pump in the pumping station. The report recommended that the fat be removed by high pressure jetting and that the failed pump be repaired or replaced. These problems, which were subsequently attended to, appear to the council to be symptoms of an unsuitable, insufficient and/or defective drainage system warranting full investigation and permanent resolution. The suggestion made during the meeting that residents are largely responsible for causing the site's drainage problems by pouring fats and oils down the sink (the evidence for this being presence of fats identified in the drainage survey) gives the council cause for concern about the park management's attitude towards care for site residents.

Residents' health, safety and welfare must not be compromised and local authorities are expected to effectively carry out their licensing and enforcement functions. The history of repeat drainage problems and sometimes protracted resolution, leaving some residents with compromised sanitary facilities or surface flooding, raises the question whether licence conditions now need to be added to the Broadfields Park caravan site licence. During our meeting, however, you gave firm assurances that you were prepared to carry out all necessary works without the need for them to

be added to the licence as conditions. You expressed in the strongest terms your wish to do the works voluntarily rather than under imposed conditions.

The actions which we consider necessary now are as follows.

Action 1: Carry out a full drainage survey to the satisfaction of the licensing authority

Carry out a detailed survey of the site's drainage system to assess its adequacy, suitability, effectiveness and weaknesses, and make recommendations for permanent resolution of the problems which have occurred over recent years in blockage and surface flooding. Agree the scope, approach and detail of this survey in advance with the council as licensing authority. The survey to be completed and a full report submitted to the council as licensing authority by 30<sup>th</sup> November 2015.

Action 2: Implement a scheme of improvements to site drainage

Implement a scheme for the improvement of on-site drainage to the satisfaction of the council as licensing authority. Carry out effectively and to a high standard all works forming part of the scheme to eliminate or minimise the risks of future blockage of the drainage system and flooding of the site. Agree the scope and approach for implementing this scheme in advance with the council as licensing authority. All works to be completed, commissioned and tested by 28<sup>th</sup> February 2016 with written confirmation provided promptly to the council as licensing authority.

Action 3: Implement a programme of site drainage inspection, servicing and maintenance

On completion of 1 and 2 above, adopt a programme of regular inspection, servicing and maintenance of the drainage system in order to ensure its continued serviceability and freedom from recurrent problems, and keep records of all such activities available to inspecting council officers. A full and final proposal for the inspection, servicing and maintenance of site drainage to be submitted to the council as licensing authority by 28<sup>th</sup> February 2016.

Action 4: Remedial removal of backed-up drainage effluent in the event of further backing up

Pre-plan and make arrangements to secure urgent remedial action that is implemented promptly in the event of further drainage backing up on site. This remedial action must include if necessary repeated removal of backed up effluent by tanker to maintain serviceable foul drainage for all residential units on the Park, without them being impacted by any backing up of sanitary facilities. A documented record of remedial action to be kept in a site log by the company and made available to inspection on request by officers of the council as licensing authority.

**Emergency Contact**

Lancaster City Council has received complaints that residents are unable to fully establish contact with the site operator out-of-hours and this is borne out by officers' experiences. Although three contact numbers are given and it is possible to leave voicemail messages (although we have been told that sometimes there is no message taking service), you accepted that no confirmation acknowledgements or responses by site management are provided to individual callers as a firm commitment. This provides inadequate means for emergency contact. Residents are entitled to effective means successfully contacting the site operator and receiving suitable assurances in the event of emergency.

Action 5: Emergency contact, personal acknowledgement and response

Put in place an effective and reliable system to receive, acknowledge and respond urgently to emergency telephone calls from residents of the Park.

Please confirm in writing to me no later than 22<sup>nd</sup> September 2015 your intentions to fully implement these requirements now. If you require any clarification then please do not hesitate to contact me by telephone on 01524 582740.

After careful consideration we have decided to give you the opportunity to complete actions 1 and 2 above on condition (a) that they be fully completed and the outcomes confirmed as required

above in this letter, and (b) that meanwhile that the contingencies in actions 4 and 5 be put in place by Friday 18<sup>th</sup> September 2015.

Should these actions not be completed within the timescales specified then we will have no alternative but to pursue them as conditions being added to the Broadfields Caravan Site Licence under the Caravan Sites and Control of Development Act 1960. Please note that the council is empowered to make licence condition changes. The council's Licensing Regulatory Committee takes the final decision on licensing conditions and there is a subsequent right of appeal to a tribunal for site operators wishing to dispute imposed conditions.

Yours faithfully,

**Susan Clowes,**  
**Public Health Team Leader**

[cc. rachel.whaley@gva.co.uk](mailto:cc.rachel.whaley@gva.co.uk)

cc. [cheralyn@caravans.com](mailto:cheralyn@caravans.com)