

# Southend-on-Sea Borough Council

Report of Corporate Director Adult & Community  
Services

to  
Licensing Committee

on  
21<sup>st</sup> March 2012

Agenda  
Item No.

4

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Private Sector Housing Services

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## East Beach Caravan Site - Application for Variation of Licence Conditions

A Part I Public Agenda Item

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### 1. Purpose of Report

- 1.1 To report back and consider the responses received as a result of the consultation requested by the Licensing Committee at its meeting on 24<sup>th</sup> October 2011.
- 1.2 To consider the application by Tingdene (MJ) Ltd. to vary the Site Licence conditions for East Beach Caravan Site to permit up to 32 residential park homes on the North Field and to allow permanent residential occupancy on the North Field all year round; having regard to all material considerations including the responses received.

### 2. Recommendation

**To approve the application to vary the Site Licence conditions for East Beach Caravan Site to:**

- **Remove the reference within the Site Licence conditions to the North Field of the East Beach Caravan Site being occupied for seasonal use;**
- **To replace the currently permitted 15 static holiday caravans and one site employee caravan with no more than [32] caravans/mobile homes; [To be clarified at the meeting]**
- **To remove all reference to touring units within the Site Licence conditions. (The applicants' proposal is for the removal of any seasonal touring camping facility; it is proposed that the East Beach Caravan Site will become entirely residential); and**
- **Amend the Site Licence condition to permit caravans to be stationed no less than [8] [15] metres from the Anglian Water pumping station. [To be clarified at the meeting]**

### 3. Background

- 3.1 The North Field of the East Beach Caravan Site (“the North Field”) is leased by the Council and operated as a licensed seasonal holiday caravan site. In April 2004, the lease was transferred to Tingdene (MJ) Ltd, the current licensees, occupiers and applicants.
- 3.2 The East Beach Caravan Site is divided by the railway line into a South Site and the North Field. In 2005 the Council’s Licensing Committee considered and approved a Site Licence to permit a maximum of 50 caravan/mobile homes on the South Site. The North Field had permission for 15 static holiday caravans one caravan for permanent occupancy of the licensee employee and 15 touring units.
- 3.3 In accordance with the provisions of the Caravan Sites and Control of Development Act 1960, an occupier of a licensed site may at any time apply for a variation of Site Licence conditions. The Council has a duty to then consider such an application and determine the new conditions that will apply to the licence. Before exercising its power, the Council “shall afford the holder of the licence an opportunity of making representations”.
- 3.4 A full application for a variation of the licence conditions was submitted in September 2011 by Tingdene (MJ) Ltd, the current licence holder. The application is to allow up to 32 caravans/mobile homes on the North Field for permanent residential use all year round.
- 3.5 A copy of the proposed site plan is attached at **Appendix 1**, together with an aerial photograph of the existing site layout. The precise layout could be the subject of change in the event that alternative caravan locations are necessary, albeit within such maximum number as is approved within the varied licence conditions.
- 3.6 Model Standards for Caravan Sites in England were issued by the Government in 2008. Clause 4 of the Model Standards states:  
*“The model standards represent those standards normally to be expected as a matter of good practice on caravan sites. They should be applied with due regard to the particular circumstances of the relevant site, including its physical character, any relevant services, facilities or other amenities that are available within or in the locality of the site and other applicable conditions”.*
- 3.7 The application was previously considered by the Licensing Committee at its meeting on 24 October 2011. Members were afforded the opportunity to visit the North Field prior to the meeting. At the meeting, the matter was deferred to enable consultation to be undertaken with local residents. Whilst there is no statutory requirement to consult under the Caravan & Sites and Central Development Act 1960 (other than with the local Fire Authority), the guidance does suggest that consultation may be appropriate. Accordingly, a formal consultation exercise was undertaken with local residents and various key agencies etc. Consideration of the responses received as a result of the consultation is set out in section 6 of this report.

#### **4. History of the East Beach Caravan Site**

- 4.1 The Council is the freeholder of the East Beach Caravan Site, having developed the caravan site about 40 years ago. The site is leased as a 'caravan and camping site and caravan park' and, whilst outside of the remit of the Licensing Committee, landlord's approval would be required to effect any alterations allowed by a variation of Site Licence conditions.
- 4.2 The East Beach Caravan Site has traditionally been used by a mixture of static and touring caravans and tents, albeit occupied only on a seasonal basis. The previous leaseholders had over the years, with permission of the Council, reduced the number of touring units to reflect a lower demand and increased correspondingly the number of static caravans. This was essentially the reason for the change of use of the South Site in 2005 to allow static mobile homes with permanent residential use.

#### **5. Caravan Sites and Control of Development Act 1960**

- 5.1 The Site Licence for the East Beach Caravan Site was re-issued to Tingdene under section 3 of the Act in April 2004 for an unlimited period. It was last significantly amended in 2005 to allow permanent residential use of mobile homes all year round on the South Site and to allow 15 static holiday caravans, one caravan for permanent occupancy of an employee of the licensee and 15 touring units on the North Field.
- 5.2 Section 8(1) provides that the conditions attached to a Site Licence may be altered at any time (whether by the variation or cancellation of existing conditions, or by the addition of new conditions, or by a combination of any such methods).
- 5.3 Under Section 8(2), where the holder of a Site Licence is aggrieved by any alteration of the conditions attached thereto or by the refusal of the local authority of an application by him for the alteration of those conditions, he may, within 28 days of the date on which written notification of the alteration or refusal is received by him, appeal to a magistrates court. The court has power, if it allows the appeal, to give the local authority such directions as may be necessary to give effect to its decision.
- 5.4 Section 8(4) says that in exercising their powers, the Council and the court shall have regard amongst other things to any standards specified by the Minister, which are now contained in the Model Standards 2008 for Caravan Sites in England.
- 5.5 Section 8(5) requires that the Council shall consult with the fire authority before exercising its powers under section 8(1).
- 5.6 The legal advice, from both the Council's Legal Team and the applicant's lawyer relating to this application are set out in section 7 of this report.

## 6. Consultation

6.1 It should be noted that there is no statutory requirement to consult, other than with the Fire and Rescue Service. However, in accordance with the Committee's decision at its last meeting and in accordance with the model standards, consultation has been undertaken. Details of the responses received are set out in this section and **Appendix 2** of this report. The model standards do not state the extent of any consultation undertaken other than with local residents or a residents' association.

### 6.2 Essex Fire & Rescue Service

The Essex Fire and Rescue Service has been consulted and has confirmed that it has now audited the application and formal representation will not be made to the Licensing Authority. However they have advised that in addition to the Caravan Sites and Control of Development Act 1960, the common areas of these premises must also comply with the requirements of the Regulatory Reform (Fire Safety) Order 2005 and they have now been entered on the Service Risk Based Inspection Programme.

### 6.3 Local Residents

Consultation has been undertaken with the local residents immediately adjoining all sides of the North Field on the basis that these are the only properties that are materially affected by the application. Additionally the Shoeburyness Residents' Association and the Shoebury Village Residents' Association were included in the consultation. This consultation is on a larger scale to that undertaken in respect of the application to vary the conditions of the Site Licence in 2005.

Details of the responses received are attached at **Appendix 2** and the main concerns expressed by local residents are as follows:

- the loss of the only available holiday static, touring and camping accommodation facility for visitors to the town;
- caravans/mobile homes obstructing an existing view;
- the appearance of the caravans/mobile homes;
- high density of the caravans/mobile homes proposed;
- devaluation of property prices; and
- an increase in usage to local infrastructure/local road traffic/congestion.

An appraisal of these matters is contained in section 8 below.

### 6.4 Shoebury Residents' Association

The Shoebury Residents' Association has been consulted and their comments are as follows:

*"The Association's objection to the variations is that the implication of agreeing the variations will be to reduce the potential of Southend-on-Sea, and especially Shoeburyness, to be an attractive tourist destination permanently by removing*

*the Shoeburyness East Beach touring site for use by touring caravans and by campers.*

*The Council has spent significant monies and effort to improve the East Beach area, and it is a pity that more people will not be able to benefit from these investments.*

*The Association is anxious to do all it can to improve the prosperity of Shoeburyness, and particularly to provide more custom for the shops in Shoeburyness, thereby encouraging local employment, especially of our young people.*

*Without this site, there will be nowhere for our visitors to camp or bring their caravans within Shoeburyness.*

*Potential visitors to Shoeburyness are directed to visit the site at Wallasea to the detriment of the economy of Shoeburyness and Southend-on-Sea Borough”.*

These matters are appraised in section 8 below.

## **6.5 Shoebury Village Residents Association**

The Shoebury Village Residents' Association has been consulted and no response has as yet been received.

## **6.6 Corporate Director Enterprise, Tourism and the Environment**

### **6.6.1 Planning**

Planning Consent was granted on the 16<sup>th</sup> November 1970 for use of the East Beach Caravan Site as a caravan camping site. There were no conditions attached to the planning permission.

The replacement of static or touring caravans by mobile homes would not involve a material change of use from the permitted user and would not be a breach of planning consent. A mobile home will also be a caravan as defined by the Act.

Planning permission is normally required for operational development. However, permitted development rights are granted for development required by the conditions of a Site Licence for the time being in force under the Act. It is therefore important that any new conditions are carefully considered by this Committee.

The Local Plan states that no additional permanent camping or caravan sites will be permitted within the Borough and , in particular states that any extension to the existing site at East Beach will only be permitted if used for non residential caravans and provision is made for touring caravans. However the application does not involve an extension to the East Beach Caravan Site and does not require consent for a change of user as discussed above. It is therefore not pertinent to this application.

### 6.6.2 Highways

The Council's Highways and Road Safety Team have been consulted on this application and have confirmed that they do not believe that the change of use will have a detrimental effect on the highway network. The North Field is serviced by good sustainable public transport links. Adequate parking is proposed which exceeds the Council's approved policy for parking standards and this is also a condition within the Site Licence. The access to the North Field meets the requirements set out in the model standards and is included in the conditions of the Site Licence. There have been no recorded accidents in Blackgate Road from its junction with High Street, Shoeburyness to the level crossing.

### 6.6.3 Waste Management

This is controlled by conditions on the Site Licence and the Council's Waste Management Team has raised no objections.

### 6.6.4 Tourism & Promotions

No comment.

## 6.7 Corporate Director Children & Learning

It is intended by the applicant to market the properties to persons over 55 years of age and the Department do not believe that there would be any significant impact on the existing capacity of the local schools.

## 6.8 Housing

The variation of the Site Licence conditions will provide a small amount of affordable housing primarily for the elderly, and conditions need to ensure it meets quality standards.

## 6.9 Culture

It is regrettable that the approval of the application would result in the loss of the only touring camping site within the Borough.

## 6.10 Anglian Water

The condition on the current Site Licence provides that no habitable units should be located within 15 metres of any pumping stations to minimise the risk of odour and noise nuisance.

As part of the application, Tingdede has applied to reduce this distance to 8 metres and have provided a report by an acoustic consultant. The report recommends that "a minimum distance of at least 4 metres between the existing Anglian Water pumping station and the nearest proposed park home, to enable an acceptable noise situation to occur".

Anglian Water have been consulted on the application. They have confirmed that under normal circumstances they would generally view the proximity of residential property within 15 metres of any Pumping Station as inadvisable. However, given the established operational reliability of this Pumping Station,

the risk of nuisance and consequent loss of amenity in this instance is low. Therefore, they would be prepared to accept a minimum distance of no nearer than 8 metres provided this is kept under review and that should any subsequent nuisance occur which compelled Anglian Water to take action, they would in the first instance seek to reinstate a 15 metre exclusion zone. We are unable to include an enforceable condition to meet this objective of Anglian Water. Furthermore a 15 metre distance would have a bearing on the number of units permitted in the North Field.

The Council's Regulatory Services has assessed the acoustic engineer's report supplied by the applicant and confirm that a minimum 8 metre distance should be sufficient, but they have concerns about the type of construction of the units and advise that the recommendations in the acoustic report commissioned by the applicant are verified. Details will be provided at the meeting.

The Council is not able to impose any conditions on the Site Licence relating to the materials used in the construction of the caravans/mobile homes under the Caravan Sites and Development of Control Act 1960. However, it should also be noted that the units on the North Field will be for residential use and shall be new. They will therefore need to have been constructed to 'BS3632:2005 Residential Park Homes specification', part of which covers insulation. BS3632 is a vast improvement on the old type of unit (metal sheet construction).

#### **6.11 Environment Agency**

The applicant is working closely with the Environment Agency particularly in respect of Flood Planning. The applicant has prepared a Flood Risk Assessment, which has referenced the Council's Strategic Flood Risk Assessment as part of the appraisal. A condition is included in the Site Licence.

#### **6.12 Southend Primary Care Trust**

Consultation has been undertaken with the PCT and their response is awaited.

#### **6.13 MoD**

Consultation has been undertaken with the MoD and their response is still awaited.

### **7. Legal Issues**

7.1 The application is to vary the conditions on the Site Licence of the East Beach Caravan Site, so as to permit a change in the use of the North Field from holiday and seasonal use to permanent residential use. The question for the Committee is to consider whether as a result of such variation to the conditions, there is any significant detriment to future occupiers of the North Field, adjoining owners or the public at large which would justify refusal of the application under the provisions of the Caravan Sites and Control of Development Act 1960.

7.2 Case law has established that such an application cannot be refused for solely planning reasons [Babbage v North Norfolk District Council 1989 and Esdell

Caravans Parks Ltd. v Hemel Hempstead Rural District Council 1965]. For example:

- Whilst the nature of the use of the North Field would change, this is predominantly a planning matter and is not a ground for refusal.
- The loss of a static holiday and touring camping site within the Borough is solely a planning matter and is not a ground for consideration by the Committee. To this extent the recommendation contained in paragraph 13.1.1 of the Appraisal to the report on the 24<sup>th</sup> October 2011 is incorrect. This point is re-iterated by the applicant's lawyer (see paragraph 7.7) below.

7.3 Non licensing matters are not pertinent to consideration of the application e.g. property and Landlord & Tenant matters.

7.4 Where a site complies with conditions for the protection of occupiers or adjoining owners under the above Act or in accordance with the Model Standards for Caravan Sites 2008 (as published by the Communities and Local Government), there are no grounds for refusal in respect thereof. The model standards set standards regulate the layout and provision of facilities, services and equipment for permanent residential caravan sites.

7.5 There must be a proper assessment of the evidence. Unless this shows that a permanent residential use would have a detrimental impact on occupiers of the North Field, local residents or other members of the public, as compared to seasonal or holiday use, then the application should be granted. This will also involve a consideration of the adequacy of local services such as schools and health care to cater for the reasonable requirements of residents and the adequacy of local roads. These factors may be of limited significance in assessing the suitability of the site for use by holiday makers, where the occupation is seasonal and short-term and there is a more limited dependence on local services, but may be considered of more importance in considering its suitability for permanent residential occupation.

7.6 Clearly if the current conditions on the Site Licence are maintained this will stop the applicant's proposed use of the North Field even though this proposed use has planning permission (and to that extent will restrict the effective enjoyment of that permission). The Committee must bear in mind that any such interference has to be proportionate and clearly justified on the evidence.

#### 7.7 **Legal Comments of Applicant's Lawyer**

The applicant has implemented a pre-action protocol for judicial review and in support has provided a copy of the advice of its barrister.

On the merits of the application the following points are made by the applicant's barrister:

- a. The power to impose license conditions does not extend to limiting the number of caravans at East Beach Caravan Park other than for valid licensing issues such as the spacing of caravans and other matters referred to in the model standards.



- b. The site license cannot be used to impose conditions which restrict the length of stay or nature of occupation and certainly not the loss of touring caravan and camping facilities as planning issues.
- c. Issues relating to the loss of holiday static caravans and touring caravans and their being detrimental and not in the interest of the public, are irrelevant considerations in site licensing of caravan sites pursuant to the 1960 Act. They are planning issues and not site licensing issues.
- d. Site license conditions must be based on public health and similar considerations and must not trespass on planning considerations and functions.

The Council's Lawyers do not take issue with the above conclusions.

The applicant's barrister has given further advice about the application and the comments of the Council's Lawyers are set out in respect of each matter:

- a. That failure to issue a decision within two months gives the applicant the right to carry out the works in any event with the effect that the Council is effectively estopped from deciding the application. Comment: Whilst there are time limits set in the legislation for considering an application for a Site Licence, it is not agreed that these requirements apply to the variation of conditions. Notwithstanding that the application has been delayed by the requirement for consultation etc Members may nevertheless decide the application on its merits.
- b. The matter is a straightforward application and is usually dealt with by delegated authority. Comment: Whilst this might be the case with some other authorities under the Constitution the matter falls to be dealt with by Members.
- c. That delay gives the applicant grounds for judicial review and the Council should issue the Site Licence in the terms sought. Comment: It is important that the Members make a decision at the forthcoming meeting to avoid the applicant seeking such a remedy. The applicant may also appeal any adverse decision by the Committee to the magistrates' court. It is therefore essential the decision reached by the Committee is sound in law on the merits as otherwise the Council risks the decision being overturned and paying the applicants' costs.

## **8. Appraisal and Merits of the Application**

- 8.1 The main issue for the Committee is whether the proposed removal of all reference to touring units and seasonal use on the North Field from the Site Licence conditions (effectively changing the East Beach Caravan Park to permanent, all year round residential site) meets the requirement of the Caravan Sites and Control of Development Act 1960.
- 8.2 The genuine concerns expressed by the local residents and the Shoeburyness Residents Association are quite understandable. However, the loss of the only available holiday static, touring and camping accommodation facility for visitors to the town and the impact on visual amenity are not valid objections under the Caravan Sites and Control of Development Act 1960 and are therefore not relevant in the consideration of this application. Furthermore, the North Field can be screened by fencing and/or landscaping in accordance with the model

standards and a condition to this effect can and should be added to the Site Licence, rather than considering a refusal based on lack of screening.

- 8.3 The issues relating to the high density of the caravans /mobile homes on the North Field and the effect on the local infrastructure can be considered under the Act.

Whilst the proposed units will be larger than the mobile homes and touring caravans currently permitted on the North Field, the units are compliant with the definition of “caravan” within the terms of the Caravan Sites and Control of Development Act 1960 namely that it is “a structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being moved on a motor vehicle or trailer)...”. The interpretation of the definition has been confirmed by High Court decisions in respect of other sites. Subject to the comments in paragraph 6.10 above, the limitation of the number of units to 32 results in satisfactory level and meets density requirements under the model standard guidance. Therefore a refusal on this ground could not be substantiated and can be dealt with by condition.

- 8.4 The effect on the local infrastructure/local road traffic has been considered by the Council’s Highways and Road Safety Team who have confirmed that they do not believe that the change of use will have a detrimental effect on the highway network; this is set out in their response in paragraph 6.6.2 above. The other services, such as electricity, water, sewerage etc can be dealt with by condition to ensure they meet with the model standards. A refusal on these grounds would therefore be inappropriate.

- 8.5 Low level bollard lighting and suitable screening provision could address concerns in respect of the possible direct impact of the development raised by residents. Whilst consideration has been given to the provision of boundary fencing, the continuing natural screening by vegetation seems to be preferable especially as conditions could be added to the Site Licence to ensure regular maintenance. Any nuisance relating to noise, light pollution etc amounts to a statutory nuisance under the Environment Protection Act 1990.

- 8.6 The possibility of the devaluation of the property prices in the area is also not a material consideration under the Caravan Sites and Control of Development Act 1960.

- 8.7 Officers are unable to identify any detrimental issue that would arise from all year round use or permanent occupancy that could be sustained under the Caravan Sites and Control of Development Act 1960 and are therefore unable to identify any valid objection in respect of the application.

## **9. Proposed Variation of Site Licence Conditions**

- 9.1 The specific variations of the Site Licence conditions sought by the licensee are set out in the recommendation in paragraph 2 of this report.

- 9.2 The main variation is for the use of the North Field on a year round basis, eliminating the existing condition relating to seasonal use and to replace the existing caravans with up to 32 static mobile homes. This will change the use of

the of the caravan park from a holiday caravan park to a permanent residential mobile home park.

- 9.3 The model standards deal with the relevant issues the local authority must have regard to in setting or varying any of the conditions attached to Site Licences. These include:
- The boundaries and plan of the site;
  - Density, spacing and parking between caravans;
  - Roads gateways and overhead cables;
  - Footpaths and pavements;
  - Lighting;
  - Bases;
  - Supply and storage of gas etc.;
  - Electrical installations;
  - Water supply;
  - Drainage and Sanitation;
  - Domestic refuse storage and disposal;
  - Communal vehicular parking;
  - Communal recreation space;
  - Notices and information;
  - Flooding; and
  - Fire safety issues
- 9.4 A copy of the revised draft Licence for the East Beach Caravan Site that would enable implementation of the variation in use sought by the applicants are attached as **Appendix 3**.
- 9.5 The proposed conditions reflect the changes sought by the applicant and include some elements beyond that required by the Model Standards.
- 9.6 Under planning legislation, works to upgrade the North Field are deemed to be 'permitted development' if required by Site Licence conditions. The comments of the Area Planning Officer have therefore been incorporated into the site plan including a recommendation that parking provision is made for residential units to a minimum ratio of 1.5 spaces per dwelling.
- 9.7 The Committee should note that the Site Licence conditions do not require the provision of garages to the proposed all year round residential units. The model conditions are silent on this point. Whilst the applicant has indicated that this provision is dealt with at other sites by a condition requiring the provision of covered storage, it is felt that Members would wish this issue to be considered by the Development Control Committee. This is in recognition that garages will be a major element in the fundamental change from a seasonal static caravan site to park home use. The applicant has been advised accordingly and condition 3(v) has been specifically amended so that no garage can be erected unless planning permission has been granted for such erection.

## 10. Corporate Implications

### 10.1 Contribution to Council's Vision & Corporate Priorities

To improve outcomes for vulnerable adults and older people. This proposal will provide up to 32 new homes in the Borough and the homes are to be marketed for purchase and occupation primarily by retired people.

### 10.2 Financial Implications

None

### 10.3 Legal Implications

See Section 7 above

### 10.4 People Implications

Up to 32 new homes will be provided in the Borough and it is understood that the homes shall be marketed and purchased for occupation primarily by retired people. The views of local residents and residents associations have been sought and those views are attached as at **Appendix 2.**

### 10.5 Property Implications

Up to 32 new homes will be provided in the Borough and it is understood that the homes shall be marketed and purchased for occupation primarily by retired people.

### 10.6 Consultation

Residents associations, local residents and statutory service providers have been consulted. Whilst there is no statutory requirement to consult on this proposal the written views of residents and service providers have been sought and those views are attached as at **Appendix 2.**

### 10.7 Equalities and Diversity Implications

The Equality Act 2010 and Building Regulations 2010, Access to and Use of Buildings, Part M can not apply to caravans (park homes), as a caravan may not be classified as a caravan site. Therefore, there is no requirement for a wheel chair friendly level access to the "entry level" of the building, nor have a WC that complies with Part M. The caravan Site Licence conditions therefore do not require the park operator to provide park homes laid out to the Disability Discrimination Act 1995 and the Disability Discrimination (employment) Regulations 1996. However, the applicant has advised that the company also has a park home manufacturing plant, as such they can tailor the construction of a park home to best accommodation needs and usage for the client and/or carer. A site visit by the Adult & Community Services Adaptations Team Leader on the 13<sup>th</sup> December 2011 confirmed that a range of step-lifts and ramps are manufactured, which could be fitted to an existing park home, if required. The Site Licence conditions would not preclude a structure such as this from being installed. As a service provider, Tingdene have a legal duty to make 'reasonable adjustments' to ensure that people are not prevented from using their services because they have a disability. When deciding whether an adjustment is reasonable, service providers can consider issues such as the cost of the adjustment, the practicality of making it, health and safety factors, the size of the organisation, and whether it will achieve the desired effect, such matters for consideration would be to allow disabled parking on site (as

described BS8300 2009), other access issues to an individual caravan/mobile home, would be the responsibility of the residents when inviting guests to the site, other visitors would not be provided for as there is no other duty on the park owner administrator.

#### 10.8 Risk Assessment

There is a substantial risk that a refusal of this application will result in a successful legal challenge with adverse cost consequences given the absence of solid grounds to refuse the application

#### 10.10 Community Safety Implications

Essex Fire and Rescue service have been consulted and all health and safety requirements from a housing point of view have been met.

#### 10.11 Environmental Impact

This matter is addressed in the paper, although as stated, the application needs to be assessed against licensing criteria – it is not a planning application.

### 11. Conclusion

That the application be approved subject to the conditions to be appended to the Site Licence attached at **Appendix 2**

### 12. Background Papers

Application for Site Licence

Caravan Sites and Control of Development Act 1960

Model Standards 2008 for Caravan Sites in England

Report to Licensing Committee 24 October 2011

Report to Licensing Sub Committee C 24 January 2005

### 13. Appendices

Appendix 1: Plan of East Beach Caravan Park

Appendix 2: Analysis of Responses to Consultation

Appendix 3: Draft Revised Site Licence for East Beach Caravan Park