

INTRODUCTION

- 1 Running a Club CL can be a very satisfying and rewarding experience. Our network of over 3000 small sites, scattered throughout Britain and Northern Ireland, has brought pleasure to many thousands of our members over the past 40 years.
- 2 All CLs have to comply with a basic set of rules, some laid down by the legislation allowing us to grant Certificates and some by the Club itself. In addition, common to all caravan sites, other general legislation and rules affect CLs, most rooted in concern for the health and safety of visitors and to protect the environment.
- 3 As we all know to our cost, life is becoming more complicated. New legislation and regulations are introduced with alarming frequency and every newspaper records the growing number of claims going to court. People's expectations are constantly rising; they are more ready to complain and demand a higher standard of customer care.
- 4 Most complaints received are about matters which can be easily put right - the accuracy of entries in our Directory, maintenance of basic facilities, relatively minor disputes, excess numbers etc. To balance the record, CL owners complain about the actions of some members - unreasonable behaviour, failure to honour bookings.
- 5 If that paints a bleak picture, the good news is the relatively small number of complaints from all sources we receive, given the size of the CL network and the many thousands of visits made each year. Our mailbag always includes large numbers of very complimentary reports on members' visits - welcoming owners, wonderful facilities/surroundings, making new friends, enjoying the peace and quiet of these informal sites.
- 6 Club membership currently stands at 297,000 families and a survey last year revealed that 28% of our members rated CLs as their first choice for touring caravan holidays and 78% had regularly used CLs on their travels. Together, therefore, we must be doing a lot right!

GUIDANCE UPDATE

- 7 We send all CL owners a newsletter (CL News) twice yearly to keep you informed and updated on matters of common interest. The May 1995 issue set out for the first time a set of guidance notes, outlining your main responsibilities in running a CL imposed by a variety of statutes, regulations and common law, and where to seek advice if you ran into problems. Later newsletters dealt with some points in more detail and also covered business rates.

8 We have had many requests to expand, update and consolidate past guidance into one document, and these notes are the result. They are intended to provide advice and guidance on a number of matters relevant to you and your CL. The advice cannot cover every point but it should put you on the right track and, where appropriate, be available to show outside contractors. You are urged to seek independent professional advice on technical matters if you are uncertain. Our Field Officers and Site Inspectors are also available to give general advice. Field Officers assess new CL applications in their regions and will occasionally visit existing owners where problems have occurred. Site Inspectors visit existing CLs in their areas at least once a year, to ensure all is well and that our certificate conditions are being complied with.

9 For ease of reference, we have numbered paragraphs and the subjects covered are:

	<u>Paras</u>
a) CL Operational Rules	10 - 13
b) Public Liability	14 - 18
c) Health and Safety	19 - 22
d) Public Health (water supply and effluent disposal)	23 - 51
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(a) **CL OPERATIONAL RULES**

- 10 The Caravan Club is one of only 4 recreational organisations legally able to issue annual certificates to CL owners and the Club's network, established over 40 years, is by far the largest. Our powers stem from the 1960 Caravan Sites and Control of Development Act and these impose certain legal obligations on the Club which, together with other rules we apply, govern the way CLs operate.
- 11 In 1994, a Government review looked at the way the system was working. All 4 organizations were advised they were expected to be more rigorous in monitoring the operation of CLs and should refuse to issue a new certificate on expiry of an existing one where statutory requirements or the conditions attached to a certificate were breached. In particular, repeated complaints that the 5-van limit had been regularly exceeded, should be a reason for not renewing an annual certificate.
- 12 The good news was that the review revealed no serious problems and that the system continues to work well. That is a welcome endorsement of the superb service you provide. It is in all our interests that our CLs set the standard!
- 13 There are 8 basic rules of operation:

Rule 1: Visitors to your CL must be members of the Caravan Club (Club Rule)

This is a condition of your certificate, breach of which could also put your cover at risk should a claim arise under your public liability insurance. All members carry a membership card, renewed annually on the anniversary date of joining, so please ask to see this as evidence of current membership. Check the expiry date and note the member's name, address, telephone number and membership number in your booking-in diary, just in case any queries arise. Quite a lot of members complain to us that owners do not ask to see their cards. They like to know that CLs are for their exclusive use!

Whilst visitors to your CL must be current Club members, non-members occasionally ask to stay. Joining the Club is very simple and we would be grateful if you could explain this to potential members who, after all, could become regular visitors! They can call the Club (free) on 0800 521161 and, if paying by single credit/debit card, can be given their membership number, making them immediately eligible to use the Club's services, including your CL. Their membership card and Sites Directory will be sent to them very quickly. When phoning, please ask them to quote the reference 'CERT'. Alternatively, they can complete and return an application leaflet (available from us at East Grinstead House or on all Club sites and also from most caravan dealers), but cannot of course use your CL in the meantime. We do not supply application forms to CL owners as experience has shown that they are not used very quickly and can become out of date. This can be misleading, for example, when subscription rates change.

Rule 2: No caravan may stay for more than 28 days at a time (Club Rule)

This reinforces the touring philosophy and status of our Club's CLs and also prevents one member monopolising a pitch and denying it to others. There should be a break of at least 1 week between maximum stay visits by the same member but owners should not permit overuse of this concession, to avoid accusations of abuse by members not genuinely on tour.

Rule 3: CLs are for recreational use only (1960 Act)

Visitors should be on holiday and caravans should not normally be left unoccupied overnight or used for permanent residential purposes.

Rule 4: You may only take 5 caravans at a time (1960 Act)

Arguably the most important condition, formal planning permission and a site licence are required for more than 5 pitches and your site would no longer qualify for CL status. By far the majority of complaints the Club does receive (including those from members and other CL owners) involve excess numbers and this is clearly a major concern for the Club.

All complaints about excess numbers will be investigated. Normally an informal word will resolve most problems. However, if persistent and substantiated complaints of excess numbers are received after a formal written warning from the Club, your Certificate is unlikely to be renewed on its expiry and may, in serious cases, be withdrawn at short notice.

On investigation, many complaints on excess numbers have been the result of misunderstandings about the '3 caravan rule' and the use of land for 'exempted rallies'. For example, some CL owners have allowed extra outfits under the '3 caravan rule' and for exempted rallies to be located close to (or actually on) the designated CL area and this has led to the complaints that the 5 van CL limit has been exceeded.

The following guidance on these matters should help clarify the position, although some of it is a bit legalistic.

The '3 caravan rule' enables a person who occupies land, which comprises (together with any adjoining land which has not been built on) not less than 5 acres, to accept up to 3 occupied caravans for up to 28 days each in a 12 month period, without needing a site licence and specific planning permission.

For those wishing to check, the source of the '3 caravan' right is paragraph 3 of the First Schedule to the 1960 Caravan Sites and Control of Development Act. (If you have been keen enough to look this up, spend a moment to look at paragraphs 5 and 6, which deal respectively with CLs and exempted rally meetings).

Legal advice to the Club is that this right is **not** exercisable by an occupier of land with a CL. This is because the legal wording appears to exclude other caravan uses permitted under other exemptions. Whether or not this is a correct legal view is a matter for your Local Planning Authority; the Club is solely concerned with its responsibilities for your CL.

'Exempted rallies' are caravan meetings organised and supervised by exempted recreational organisations for their members lasting not more than 5 days. There are over 300 such exempted organisations, including our Club.

To avoid confusion, we cannot support the use of the **designated CL area** for occupation by other caravan outfits during its published open season. Where other land in the same ownership is so used, there must be a distinct physical gap between the designated CL and that other land. How that 'distinct physical gap' is provided will be a matter of fact and degree on the ground, but acceptable solutions could include a substantial planting barrier (such as a high mature hedgerow) or land separation by at least one clear field from the CL. However, decisions on what is, or is not, acceptable must remain with the Club,

based on advice from its Field Officers or Site Inspectors. In most instances, any problems will be resolved directly with them and, if you are in doubt, please consult them. In addition, exempted rallies should use a separate road access to that serving the CL and should not share water, disposal facilities and electric hookups with CL users.

Rule 5: Caravans should not be left unoccupied overnight (predominantly a Club Rule)

It is not uncommon to find caravans left unoccupied for varying periods of time. Clearly there will be exceptional circumstances when brief periods (a night or two) can be accepted. However, regular or lengthy periods effectively constitutes 'storage', which almost invariably requires separate planning permission.

Rule 6: CL owners must have public liability insurance cover for not less than £1 million against any proven claims made by members suffering damage to property or personal injury (Club Rule)

Considerable legislation (eg The Health and Safety at Work Act 1974) has increased public awareness of the right to seek compensation from site operators if visitors are involved in accidents or become ill through pollution. It is therefore necessary for CL owners to insure themselves against possible claims and we require owners to sign a declaration to this effect, which is a continuing obligation so long as the CL operates. (Further information on public liability is given in paras 14 - 18).

Rule 7: CL owners using a private (non-mains) water supply must have it tested annually by a competent authority (Club Rule)

Such owners are required to sign a declaration to this effect. (Further information on non-mains water supplies is given in paras 29 - 33).

Rule 8: CL owners providing electric hookups must have the facility inspected annually and a satisfactory certificate issued by a contractor approved by the National Inspection Council for Electrical Installation Contracting (NICEIC) or by a member of the Electrical Contractors' Association (ECA) or SELECT (Scotland) (Club Rule)

Owners providing this service are required to sign a declaration to this effect. (Further information on electrical services is given in paras 52 - 57 and in the Appendix).

(b) **PUBLIC LIABILITY**

- 14 Anyone welcoming the public onto his property has a legal ‘duty of care’ to ensure that his visitors (in this case, Club members staying on his CL) have a safe stay. Legally, public liability is a wide term intended to **include** all of the duties which the law forces upon us **involuntarily** and which we owe to the rest of the world when going about our day to day business and the liability which we incur if we **accidentally** breach those duties.
- 15 Whilst accidents on CLs are rare, it is essential to be insured for Public Liability, because it is you to whom a visitor would turn in the event of an accident such as damage to a car/caravan or perhaps a personal injury. Your insurance would cover you for any breach of your duty of care in this respect.
- 16 Public Liability insurance is a protection against negligence claims on CLs, where the owner is liable to any injured Club member for failing to take reasonable measures to keep the site safe (Occupier’s Liability Act, 1957)
- 17 You are advised to check carefully both the CL field and any other areas which could or might be accessible to members to ensure there are no potential hazards, eg an unstable cover to a chemical closet emptying point, toxic chemicals (old fertiliser bags) lying about or farm machinery which might prove an attraction to children. It is not a defence to a claim simply to say that an area is out of bounds - liability can also extend to trespassers.
- 18 Any competent insurance broker will be able to advise you on an appropriate policy and the Club also offers one, tailored specifically to CLs. If you are interested in obtaining details of the Club’s scheme, please write to or contact Lesley Coell, our Manager, Insurance and Financial Services at East Grinstead House.

(c) **HEALTH AND SAFETY**

- 19 Most of us are aware of the recent growth in legislation and regulations affecting health and safety matters. The main legislation is the Health and Safety at Work etc Act, 1974. Initially these legal controls imposed duties primarily on employers for the health and safety of their employees and anyone with whom they had business dealings. However, the scope of the Act has now been greatly extended. As already noted, you owe a general duty of care to safeguard the health and safety of your visitors but the 1974 Act and numerous other regulations impose a variety of obligations upon you. Some of these are explained below. Public liability insurance would not give protection against a successful criminal prosecution in case of breaches of a statutory duty. However, many of these regulations also create a civil statutory duty akin to negligence, which your public liability insurance should cover.
- 20 You may feel that all of this emphasis on legislation and public liability takes away much of the pleasure of running a CL, but do not despair!
- 21 Virtually all health and safety regulations are based on common sense. Walk around your property, look for potential hazards to the unsuspecting visitor, particularly children, and take sensible precautions to make them safe. On a farm, the list of potential hazards might well be a long one but do remember that common sense and reasonably practical measures are all that is normally required. The most common concerns recorded by members on CLs relate to livestock droppings on the CL area, hazards of using non-standard cesspools and difficult vehicular access.
- 22 If you are in any doubt about safety on your farm CL, contact the Agricultural Inspector at your nearest Health and Safety Executive office. If your CL is not on agricultural land, contact your local Environmental Health Officer (normally at the District Council) for advice and guidance.

(d) **PUBLIC HEALTH MATTERS**

23 These are brief notes relating to water supply and effluent disposal in existing CLs. Although there are national and regional variations, the guidelines given are generally applicable. However, references are made to latest standards likely to apply to new CLs. New regulations are not normally retrospective, although a District Inspector from the Environment Agency can require improvements if satisfied there is pollution or potential to pollute.

Water Supply

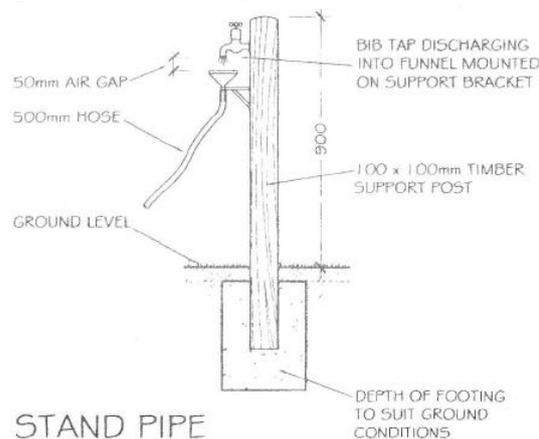
24 Most CLs will be on **mains water**, whose suppliers are responsible for the volume and quality of the water delivered to its point of discharge (normally the tap). Your responsibility is therefore to ensure that no pollution occurs between the end of the supply main and the consumer's point of access and that the water is fit for human consumption. All taps should be fitted with a non-return valve, as a precaution against back-syphonage contaminating the water supply.

25 All taps should also be mounted about 75 - 90 cm (2'6" - 3') above ground level and be firmly fixed to a rigid vertical support - either a wall or secure field post. There should be a hard, free draining standing area to prevent a muddy surround developing and an effective drain or soakaway.

26 **Drinking water taps** must be clearly marked 'drinking water only' (we will supply free signs) and quite separate (at least 2 metres/6 feet) from taps providing water to rinse waste water drains or for flushing chemical closet waste.

27 **Taps serving waste water drains and chemical closet emptying points** normally have a short length of hose (45 cm/18 inches) attached to assist rinsing drains after use. Hoses should not be long enough to reach or touch the drains, which need better drainage/soakaways than drinking water taps.

28 Existing national bye-laws are presently being revised to prevent possible contamination of the mains water supply by back-siphonage from waste water/chemical closet rinsing taps. The recommendation is for a total air gap between the tap end and the short hose used for rinsing purposes. Whilst new fittings may well be acceptable to Water Supply Companies, a simple and cheap way of achieving such an air gap would be to attach a plastic funnel to the tap post, below the tap delivery. The rinsing hose could then be attached to the funnel (see sketch below). There are purpose-made fittings now available. Alternatively, the hose may be omitted. Further guidance will be given in CL News when the bye-laws are revised.



- 29 Some CLs rely on **non-mains water**, usually from the ground (a well, spring or borehole) or surface water (a stream or lake). In England and Wales, the Local District Council (Environmental Health Officer) is the responsible authority for testing and monitoring water supplies, though some sub-contract out this work. In Scotland, the County Councils are responsible and, in Northern Ireland, the Department of the Environment.
- 30 Most private water supplies are tested on the principle that the larger number of people supplied the more frequent the testing and the more demanding the tests applied. The test applicable to CLs is usually an annual one to see whether the supply has been polluted by faecal matter from humans or animals.
- 31 The Club requires CL owners with private water supplies to have an annual test carried out (guide cost £70 - £100) and the supply approved for use.
- 32 Should a private supply fail the test, there are a number of water treatment systems available on the market. Your local Council will be able to advise you.
- 33 Clearly your CL cannot operate without being able to offer a safe and drinkable water supply.

Waste Water/Effluent Disposal

- 34 The satisfactory disposal of effluent is often a difficult problem for CL owners given increasing environmental controls over discharging effluent into a sewer, into land, watercourses, lakes and ponds and into the sea. However many long-established CLs opened before present controls came into force and these are not retrospective.

Control Agencies

- 35 In the UK, there is increasing legislation enacted to prevent pollution. Scotland and Northern Ireland often have their own legislation, whilst England and Wales tend to be governed by the same Acts and Regulations. Essentially the controls are similar, although responsible authorities differ. The main Acts in Britain include the Control of Pollution Act 1974, the Water Resources Act 1991 and the Environment Protection Act 1995.
- 36 **In England and Wales**, mains drainage is the responsibility of one of the 10 water and sewerage companies (eg Severn Trent Water, Anglian Water). The statutory authority for controlling non-mains effluent disposal (eg into or onto land, a watercourse, pond/lake or tidal waters) is the Environment Agency and 8 Regional Agencies serve the combined area. There is a nominal charge made for issuing Consents to Discharge.
- 37 **In Scotland**, connection to a mains sewer needs to be approved by the Drainage Services Section of the appropriate Water Authority, to gain consent to discharge. A charge is levied, typically £75. Consents to discharge to a watercourse are obtained from the Scottish Environment Protection Agency. A charge for a standard application is £50 - £75 for sites with less than 15 persons. The Agency also has specific duties for prevention and control of pollution and broadly exercises similar controls to the Environment Agency in England and Wales.
- 38 **In Northern Ireland**, the Water Executive with the Department of the Environment for the province is responsible for consents for discharges to sewers. The cost of making the actual connection is about £55. The Environmental Service with the Department deals with all consents for discharges, however small, for which a charge is levied.

- 39 In the main, volumes of less than 5 cubic metres (1000 galls) per day may not attract the need for CL owners to secure Consent to Discharge liquid wastes to ground. Many CLs will only generate around 0.2 cubic metres (50 gallons) per day, however there are some areas where, irrespective of volumes, Consent to Discharge is necessary from the Environment Agency. This may attract a small charge, though due to their smallness and seasonal nature, the charge may be waived. In some water catchment areas, a Consent to Discharge may be refused and a mains connection or sealed tank will then be the only options.
- 40 As a general guide on effluent disposal, because of increasing legislation and public concern over pollution, **new CL owners** will normally need to consult the appropriate authority for approval of their preferred system before installation. However, existing owners not on mains drainage may have their systems inspected by the Environment Agency and some may be required to upgrade or face closure. CLs relying on old pit/soakaway systems are particularly at risk.

Disposal Methods

41 The main options are, in order of technical preference:

- a) mains sewer connection
- b) septic tank and land drains
- c) sealed tank
- d) packaged sewage treatment plants

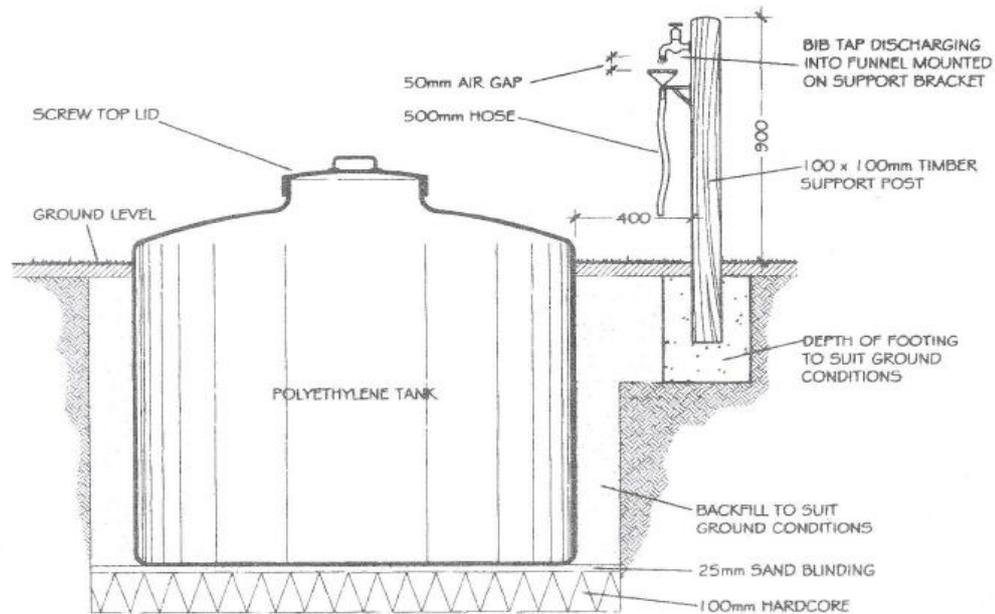
Some older CLs still operate on a soakaway pit system. In some cases, depending on surface geology and low occupancy, this method may still be acceptable but that is a matter for the responsible statutory authority. However, such a system is **not** acceptable on new CLs.

42 **Main Sewer Connection** is the preferred method of effluent disposal, provided a convenient access point is available or can be constructed to an existing system.

43 **A Septic Tank** comprises a watertight settling tank, usually divided into 2 compartments, in which wastes are held before passing down a short sewer. A septic tank does not dispose of wastes - it mainly helps to separate the solid matter from the liquid. Some of the solids float on the surface, where they form a scum (or crust), whilst others sink to the bottom where they are broken down by bacteria to form a deposit called sludge. The crust maintains an anaerobic (airless) condition beneath it in which the bacteria thrive, so it is important not to disturb the crust. The liquid effluent flowing out of the tank remains to be disposed of, normally by soaking into the ground from a soakaway pit or series of land drains in trenches. The sludge in the tank must be removed periodically. Many rural properties have existing septic tanks which may be available to the CL. It is unlikely to be cost effective to construct a new one simply to serve a CL and planning permission and a Consent to Discharge would both be required.

44 **A Sealed Tank System** simply collects and holds the effluent and has to be emptied periodically. Any CL whose option is to install such a tank should consider the size of tank and the required frequency of emptying by a specialist contractor, which will attract a charge. Suggested usage rates per couple are 23 litres (5 gallons) per day of 'grey' water (shower, kitchen etc) and 9 litres (2 gallons) per day of chemical closet effluent. Given, for example, 300 van nights per year, then a 4,500 litres (1000 gallon) tank will need emptying about twice per year. Such estimates are crude, with a wide variation, but they help quantify the requirements. For many new CLs with no ready connection to an established disposal system or for existing CLs which might fall foul of the Environment Agency, a sealed tank solution is likely to be the cheapest and most effective. There are many types of tanks readily available,

most constructed of glass fibre or heavy duty plastic, but there are also cheaper alternatives. For hard-pressed farmers, one solution could be to use surplus orange juice containers, obtainable at agricultural depots. Also used for silage, the tanks are made of high density polyethylene and hold some 3600 litres (800 galls), with a volume of some 3 cubic metres. Larger tanks are available. A guide cost is £300 - £500. A drawing showing an installation, set into the ground, is shown below. Access may be a screw or flip top. They should never be completely emptied, to reduce the chance of movement (due to their lightness when empty). A simple form of ventilation may be required.



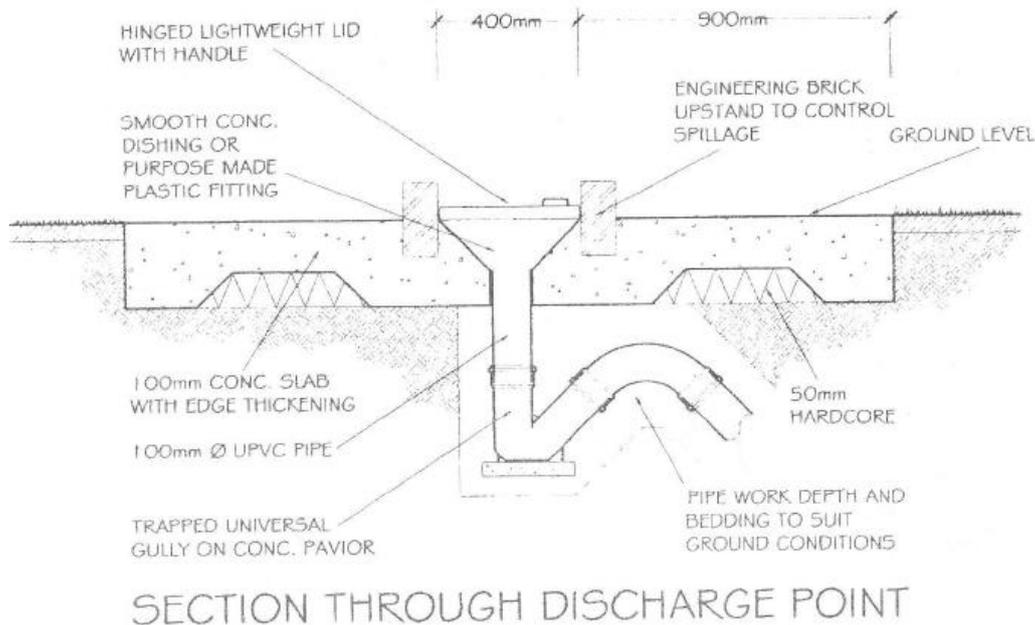
SECTION THROUGH POLYETHYLENE TANK

- 45 **Packaged Sewage Treatment Plants** are only likely to be applicable where a CL can be connected to an existing plant, which acts to purify effluent to a quality where it can be discharged to a watercourse or to ground. Due to substantial costs associated with this method of treatment, this option is really very much a long-stop and for all intents and purposes can be disregarded. Those sites where units are already installed have the greater proportion of sewage generated from other uses where any small flows generated by the CL should not effect overall efficiency. Strict quality standards are laid down for discharge by the appropriate Environmental Agency. Electrical power is usually necessary to ensure standards are complied with, and new plants will require both planning permission and a Consent to Discharge treated effluent into a water course or to ground.

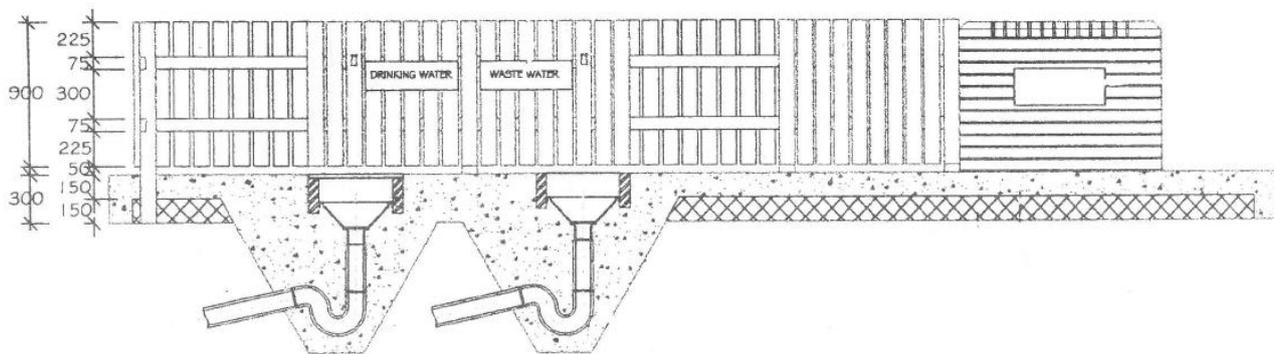
Discharge Points

- 46 It is important to ensure that the discharge point into whatever sewerage system is chosen is easy to use, clean and safe and (preferably) screened in some way. The ideal method of discharging effluent into the chosen system is via a trapped-gully emptying point which provides a water seal between the discharge point and the collection chamber. Very often a suitable existing gully can be found which is already piped to a mains drainage or a septic tank system. The gully may need to be enlarged slightly, given a more pronounced edge to contain the flow and make a better receptacle, and screened from view by low walls or woven fencing. It is essential to provide a lightweight lid to larger receiving points, particularly if it would otherwise present a hazard. The facility should be clearly signed (the Club will provide one free).

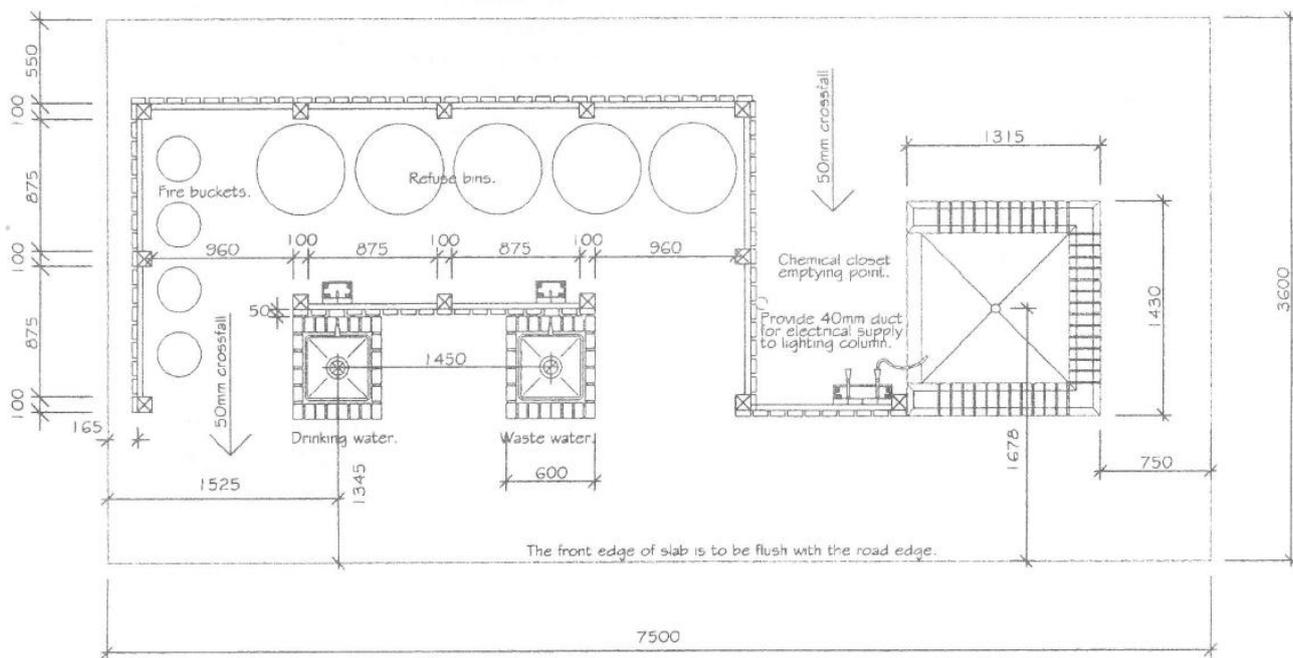
- 47 On the network there is a great variety of discharge points in use, including a standard WC and cistern. However an example of good design is shown below:



- 48 On page 13 are details of a standard Club Site service point. It is not suggested that CL owners seriously consider installing one, because they are intended to serve many more than 5 pitches and cost around £5,000! However, information on their design may be helpful for adaptation for use on CLs.
- 49 A less suitable method is to discharge the effluent into the sewer via an existing manhole. The lid of this should be of lightweight manufacture and lifting handles or hooks be provided. This system can pose problems for some caravanners and the view into the sewer when pouring does not always brighten the day.
- 50 In the case of sealed tank and pit soakaways, a design such as hinged trapdoor lid and funnelled receiver or fixed grille should be used, so as to guard against a child or pet falling into a very hazardous situation. A covering sheet of metal or timber panelling is **not** acceptable.
- 51 In all cases, a firm dry standing area of paving slabs, gravel etc is needed to avoid an unpleasant, muddy surround and for health and safety reasons. It is essential to ensure that there is no potential hazard at the disposal point, particularly for young children.



SECTION THROUGH SERVICE POINT



STANDARD DETAIL
SERVICE POINT
(as proposed) 

(e) **ELECTRICAL SERVICES**

- 52 Nearly 1000 CLs provide electric hookups and, as most caravans are able to connect into a mains supply, there is a growing demand for such a service which, if provided, merits an additional charge to visitors who use it. (See Appendix, para 10 for guidance on charges).
- 53 While caravanners are responsible for the safety of their own electrical equipment, **you have that responsibility up to the socket-outlet to which the caravanner connects.** So, if you decide to offer hookups, do remember that they are potentially dangerous unless correctly installed and maintained.
- 54 For CL owners thinking of installing electric hookups, some detailed guidance notes (which are applicable throughout the United Kingdom) are attached as an Appendix. The notes are technical and should be shown to your electrical contractor.
- 55 Those of you already providing electric hookups are advised to remind yourselves of your continuing obligations by looking at points 8 and 10 in the Appendix. The rest of the notes apply to new installations.
- 56 **However, all CL owners offering hookups should note the Club's requirement that installations are tested by an approved electrical contractor on an annual basis. Owners sign a declaration to this effect, so long as the CL continues to operate with hookups. Our Site Inspector may well ask to see your test certificate when he visits you.**
- 57 The severe consequences of providing unsafe electric hookups cannot be over-emphasized. Some reported incidents have been very serious and the Club will respond quickly in the interests of members' safety, which could well result in immediate withdrawal of your Certificate. Some cases have resulted from a blatant disregard of safety standards, whilst others have occurred when CL owners have tried to be helpful to members by allowing domestic connections to a house or outbuilding supply but which is potentially very dangerous. **Please** exercise the utmost care to avoid serious injury or illness to your visitors.

(f) RATING OF CLs

58 CLs are liable to business rates.

59 In the UK, business properties are now assessed every 5 years by Valuation Officers to determine their 'Rateable Value' (RV), which is based on an assumed 'rental value' if the property was leased or let. The RV is then multiplied by the 'Uniform Business Rate' (UBR) to determine the amount you will actually pay in rates over the coming year. The current UBR in England is 41.6 pence, Scotland is 45.8 pence if $RV < \pounds 10,001$ or 44.8 pence if $RV > \pounds 10,000$ and in Wales 41.2 pence. The UBRs are reviewed by the Government each year.

60 The Valuation Office Agency (VOA) is the responsible agency for England and Wales, the Assessors Office for Scotland and the Valuation Lands Agency in Northern Ireland. Both latter agencies appear to operate slightly different systems.

61 There was a national revaluation of RVs as at 1 April 2000 which will remain in force until 2005 (unless you make alterations to your property).

62 In order to soften the blow of often substantial revaluation increases (140% increases on larger caravan parks have been reported), the Government has retained 'Transitional Relief' arrangements. These are very complicated and vary between England, Wales and Scotland but if eligible you will automatically see that it is included on your Rate Demand. However, any increase over the previous year's rate bill will be limited, after allowing for inflation, to 5% for 2000/01, rising to 7.5% in each of the following 4 years.

63 The VOA divides CLs into 2 categories:

- a) 'Basic CLs' are those providing the basic minimum facilities required by the Club's certificate.
- b) 'Developed CLs' are those providing additional facilities to those required by the Club's certificate eg hardstanding pitches, made up site roads, hookups, toilet facilities.

64 The system for rating CLs is similar to that applied to all caravan sites, based on turnover (or total receipts) in a selected base year. From 1 April 2000, the base year is the financial year April 1997 - March 1998. CLs joining the network after the 1997/8 financial year will have their latest available year's results 'toned back' to the base year by applying 3% to the latest annual figure and multiplying it by the number of years back to the base year.

'Basic CLs'

65 The following table shows the Rateable Value your CL will receive in the Rating List 2000, based on your annual turnover in 1997. For comparison, the 1995 rating scale is also shown which was based on gross receipts in 1992.

Rating list 1995 Gross Receipts 1992 £	RV £	Rating List 2000 Gross Receipts 1997 £	RV £
Up to 425	Nil	Up to 500	Nil
426 - 450	50	501 - 550	40
451 - 475	60	551 - 600	60
476 - 500	70	601 - 650	80
501 - 525	80	651 - 700	100
526 - 550	90	701 - 750	120
551 - 575	100	751 - 800	135
576 - 600	110	801 - 850	150
601 - 625	120	851 - 900	165
626 - 650	130	901 - 950	180
651 - 675	140	951 - 1000	195
676 - 700	150	1001 - 1050	210
701 - 725	160	1051 - 1100	225
726 - 750	170	1101 - 1150	240
751 - 775	180	1151 - 1200	255
776 - 800	190	1201 - 1250	270
801 - 825	200	1251 - 1300	285
826 - 850	210	1301 - 1350	300
*851 - 900	220	1351 - 1400	315
		1401 - 1450	330
		1451 - 1500	345
		1501 - 1550	360
		1551 - 1600	375
		1601 - 1650	390
		1651 - 1700	405
		1701 - 1750	420
		1751 - 1800	435
		**1801 - 1850	450

* £901 and above @
25% rounded to the nearest £10

** £1851 and above @ 25% of
receipts, rounded down to nearest £25

66 There are two ways that your rating liability might be reduced from that emerging from applying the above scale:

- (i) If the costs of running your CL are higher than those assumed in the table. To give a guide on this, if the RV is £100, on 1997 receipts of £651, the 'divisible balance' (ie the effective net profit to be shared 50/50 between the notional tenant and landlord) would have been £200. Subtracting £200 from £651 gives an assumed running cost of £451. Clearly, if you are to successfully argue for a reduction in RV due to abnormal running costs, you will need to have a full set of accounts and you should obtain professional advice before proceeding with an appeal.
- (ii) **If you qualify as a basic CL₂**, you could decide to operate for less than your full year's entitlement under the Club's Certificate. In short, by opening for less than your full season (eg requesting that your Certificate runs from just before Easter to the end of September) you could ask that the RV be deleted at the end of your season and

re-entered at the beginning of the next. The Valuation Officer would however expect the CL area to revert to another use during the closed period (eg some agricultural or other use) and you may well get a questionnaire asking for details.

67 The following is an example of how rates apply to a **basic CL** in England with 1999 gross receipts of £1,000. It shows how the RV is calculated from 1 April 2000, which will be related to gross receipts obtained in 1997.

	£	
• 1997 receipts	=	1,000
• Tone back by 3% pa to 1997 (£1,000 x 3% x 2 years)	=	<u>60</u>
Balance	=	<u>940</u>
• Apply £940 to 2000 RV scale gives RV of		180
• Rates payable for full year, 1 April 2000 to 31 March 2001		
= £180 x 41.6p (Uniform Business Rate in England)	=	£74.88
= £180 x 41.2p (Uniform Business Rate in Wales)	=	£74.16

(Note: this ignores transition, if applicable)

‘Developed CLs’

68 These CLs will tend to be more heavily used, provide more facilities and are perhaps operated on more commercial lines. Owners will be rated on 1997 turnover when that **exceeded £500**, at a rate within the range 14% to 20%. However, as advised in our April 1998 Newsletter, the actual percentage range applied will be between 18% - 20%. The VOA gives the following examples:

- i) Where the CL has 2 or 3 electric hookups but retains the Greenfield characteristics (ie grass roadways and no landscaping) 20% of gross receipts would be applied to arrive at the RV
- ii) where the CL has 5 hookups a shower/toilet block and tarmac or gravel roads, 18% of gross receipts would be applied to arrive at the RV.

69 The following is an example of how rates will apply to a **‘developed CL’** in England with 1999 gross receipts of £1,000:

• 1999 receipts	=	£1,000
• Tone back by 3% pa to 1997 (£30 x 2 years)	=	£ 940
• Multiply by (say) 18% to give RV	=	£ 169
• Rates applicable for a full year 1 April 2000 to 31 March 2001		
= £169 x 41.6p (Uniform Business Rate for England)	=	£ 70.30
= £169 x 41.2p (Uniform Business Rate for Wales)	=	£ 69.63

(Note: this ignores transition if applicable)

70 There may be particular circumstances whereby owners of developed CLs might be able to claim abnormal running costs, to justify claiming an additional allowance. The considerations are similar to those described for ‘basic CLs’ in para 66 (i).

Appeals (all CLs)

- 71 Appeal forms can be obtained from your local Valuation Office (not the Rating Authority). These cost you nothing and are relatively easy to follow. The form should be completed and returned to your local Valuation Office but do retain a copy. You will be required to supply a full set of accounts for the 1997 season and if you are already assessed for rates, the appropriate earlier years. If not, and you reveal that you did trade in earlier years, the Valuation Office has the right to rate you from when you first opened. However, if asked when the CL opened - the answer should be correctly stated as 1 January in the current year as the certificates are renewed annually.

Appeal proceedings are informal and you should not feel over-awed. Often Valuation Officers will seek to reach agreement with you before an appeal hearing. However, if the appeal involves a 'serious' financial claim, you are strongly advised to seek professional help with experience in caravan rating before proceeding. Sources of such advice are:

- The Royal Institution of Chartered Surveyors (RICS)
- The Institute of Revenues, Rating and Valuation (IRRV)

Members of these bodies have letters after their names denoting their qualifications. Beware of cowboys!

Farm CLs

- 72 At least half of the Club's CLs are on farms or agricultural holdings and there has been an interesting (and unresolved) discussion with the VOA as to whether or not owners are liable for business rates at all, particularly if their CL usage is low.
- 73 The Club has sought on your behalf leading Counsel's opinion on this question but the advice received has been challenged by legal advisers to the VOA. The Club has held discussions with the National Farmers Union on the impact of rating farm CLs and the NFU is lobbying relevant Government Ministers, drawing attention to the impact of rating on small rural businesses.
- 74 Regretfully, the Club cannot become involved in advising on individual rating assessments. You should therefore seek professional advice in the event of difficulty.

(g) **OTHER MATTERS**

75 Other matters commonly raised by owners and members are commented on below:

i) CL Pricing

76 A word on pricing. With market competition intense, price is an important consideration for many of your visitors. Many larger sites are offering a variety of discounts (eg for off-peak periods, '4 nights for the price of 3' etc). We do not suggest you go down this route because most of your prices are already at a sensibly low level, your costs continue to rise and there are difficulties in your being able to advertise discounts anyway. Whilst pricing is a matter for you to decide, we do urge that you try to hold to charges published in the Sites Directory and that you keep a close eye on what other CL owners in the area are charging, having regard to the facilities they are offering. If costs increase beyond your control (eg rates, emptying charges, testing costs) forcing you to raise prices, then do try to minimise them and explain the reason to members. We advise you to display any charges which differ from those appearing in our Directory, so members can see them on arrival. Many members, particularly those on fixed incomes, are feeling the pinch as much as you but they will usually respond when the position is clearly explained to them.

(ii) 'No Shows'

77 Many of you have reported a growing number of dishonoured bookings and we can well appreciate the problems caused, particularly at peak times, when you hold to the 5 van limit, refuse many enquiries and then find people do not turn up.

78 We will continue to draw members' attention to this problem in the Club's Magazine and of course the vast majority are horrified that fellow members act in this selfish way. As much as we all regret it, if you are finding this to be a big concern, you should consider insisting on a non-returnable booking deposit, particularly for busy periods. Members will certainly respond positively if the reason is explained to them.

(iii) Accuracy of Published CL Details

79 An accurate description of your CL and directions to it are very important, both to avoid disappointment and problems in finding the site after a long, tiring journey. A small but worrying number of complaints are being received on this subject and, if something is seriously incorrect in the published details, the complaint becomes more vociferous. To give but one example, a member with a large caravan was unable to negotiate an access road onto a CL and was forced to reverse for a distance, resulting in an (almost inevitable) altercation with a stone wall. He claimed, with a degree of justification, that there was no warning in the published details that some large outfits might have difficulty. Another member, an estate agent, wrote a very balanced letter in which he noted that if his house sale particulars were as accurate as some of our CL entries he would have been sued out of business for misrepresentation!

80 These are valid points and, as we all know, circumstances change both to individual CLs and to members' expectations. Would you please take time to look at your Directory entry, **seeing it through the eyes of a visitor**, and consider whether it paints an accurate picture of what is there and how to reach it without undue incident. If you decide to amend the details, please write to our Publications Department at East Grinstead House and we will do the rest.

(h) **CONCLUSION**

81 If you have managed to plough through the preceding 80 paragraphs, you may well be wondering why you operate (or are thinking of setting up) a Club CL. Rules, regulations, potential insurance claims, rates - it all seems so complicated!

82 But take comfort! These small, informal sites bring enormous pleasure to thousands of our members every year and give you the opportunity to make new friends and perhaps raise some extra income. Government and Local Authorities welcome this informal type of recreation/tourism in the countryside and visitors help support hard-pressed local economies with their holiday spending. **In practice, very few problems arise from our 3,000 plus CLs, which operate all over Britain and in Northern Ireland.**

83 However, the purpose of these Guidance Notes is to help you if problems do arise and to tell you whom to contact should you need advice. We hope you find them useful.

The Caravan Club
May 2000