

## **Proposed Model Standards for short stay small sites used solely by touring self-contained motor caravans (motorhomes and campervans) for Scotland**

These model standards have been prepared by CAMpRA Ltd as appropriate conditions to be used in the granting of caravan site licences when applications for Aires are made using the existing legislation.

Justifications for these proposed Model Standards are included in Appendix A.

The following Model Standards are recommended to apply to short stay small sites to be used solely by touring self-contained motor caravans (motorhomes and campervans). Such sites are commonly known as Aires.

A self contained motor caravan is a vehicle meeting the EU Type Approval definition of a M1SP motor caravan, i.e. a motor vehicle with living accommodation space which contains the following equipment as a minimum:

- a. Seats and table.
- b. Sleeping accommodation which may be converted from the seats.
- c. Cooking facilities.
- d. Storage facilities.

This equipment shall be rigidly fixed to the living compartment. However, the table may be designed to be easily removable.

Additionally, a self contained motor caravan must contain:

- a. Onboard toilet, with integral waste storage, which may be fixed or portable.
- b. Onboard fresh water storage of sufficient capacity for the normal use of the occupants.
- c. Onboard waste water storage of sufficient capacity for the normal use of the occupants.

It is recommended that a suitable fire extinguisher & smoke alarm are installed.

### **1.Site Boundaries**

The boundaries of the site, or the area allocated for motor caravans, should be clearly discernible on the ground by surface marking or other means.

### **2.Density, Spacing and Length of Stay**

The maximum permitted length of stay is 48 hours, with no return within 7 days.

The number of motor caravans on site at any time is not to exceed 10.

The limits in this section may be decreased if desired, or increased where the landowner and local authority agree, in this instance the additional facilities noted in the relevant sections must be provided.

Every motor caravan must be not less than 3 metres from any other motor caravan.

To achieve this it is suggested that a parking bay width of 5.5 metres is provided where no solid barrier is used between bays. Where a solid barrier is used this should allow a separation distance of at least 3 metres. Ideally, bays should be permanently marked. Motor caravans must park in the centre of bays (where marked).

In the case of existing car parks it is desirable that consideration is given to the provision of appropriate bays. If this is not practicable it may be considered appropriate, as a temporary measure, to allow one standard bay separation between motor caravan bays. Motor caravan bays should be marked as such.

No items or equipment are permitted to be placed outside the motor caravans, with the exception of drive on/off levelling ramps and a step for access. The use of attached levelling or steadying devices is not permitted. Awnings may not be deployed.

### **3.Roads, Gateways and Footpaths**

Adequate access for fire appliances must be maintained.

When numbers and length of stay are increased footpaths and roadways should be to the satisfaction of the local authority.

### **4.Fire Precautions**

A fire safety risk assessment must be carried out, to meet the requirement of The Fire (Scotland) Act 20051, or subsequent revisions.

### **5.Electrical Installations**

Where provided, electrical installations must comply with the requirements of BS7671:2018 Section 708, or subsequent revisions, and must have an annual Electrical Installation Condition Report.

### **6.Drinking Water and Waste Disposal**

An adequate supply of drinking water may be provided, this may be on site or nearby.

A waste water disposal point may be provided, this may be on site or nearby. The appropriate Water Authority should be consulted about the arrangements for disposal of water likely to be contaminated.

A recycling and rubbish storage and collection system may be provided.

Where more than 10 motor caravans, or stays of more than 48hrs are authorised, all the facilities in this section must be provided on site or nearby.

### **7.Disposal Point for Chemical Toilets**

A disposal point for the contents of chemical toilets may be provided. This may be on site or nearby. The method of disposal should be to the satisfaction of the Local Authority and the appropriate Water Authority.

Where more than 10 motor caravans, or stays of more than 48hrs are authorised, a toilet waste disposal point must be provided on site or nearby.

### **8.Site notices**

A notice must be prominently displayed on site and must contain the following information:

- The name and address of the site (*e.g Name of car park, and adjacent road name, town and postcode*)
- Contact details for the site operator or owner
- Vehicles permitted to use the site: “The site is solely for the use of self contained motor caravans, which must contain:
  - Onboard toilet, with integral waste storage, which may be fixed or portable.
  - Onboard fresh water storage of sufficient capacity for the normal use of the occupants.
  - Onboard waste water storage of sufficient capacity for the normal use of the occupants”
- Maximum numbers and length of stay: (*the authorised limits must be stated*)

- External equipment: No awnings may be deployed and no items or equipment (e.g. tables, chairs, barbecues, water containers, generators, gas cylinders, etc.) may be placed outside, or attached externally to, the motor caravan, with the following exceptions:
  - A step may be used for access to the vehicle.
  - Levelling ramps may be used. Attached levelling or steadying devices may not be used.
- Spacing Requirements: In order to comply with the fire regulations, motor caravans must park in the centre of bays (where marked) and there must be minimum separation of 3 metres between vehicles.
- What to do in the event of an emergency [eg On discovering a fire:
  - Ensure the motor caravan or vehicle is evacuated.
  - Alert occupants of nearby vehicles.
  - Call the fire brigade dial 999 or 112. The nearest telephone is sited at xxx. (*include simple diagram showing location*)]
- The nearest Doctor's Surgery is at: xxx Telephone: xxx.

**CAMpRA UK Ltd (Company Number 13405866) has prepared this document using information available at the time and accept no liability for the recommendations made in this document or the use thereof.**

## APPENDIX A

### **Justification and references to accompany the proposed Model Standards for short stay small sites used solely by touring self contained motor caravans (motorhomes and campervans) in Scotland**

The current Model Standards for Caravan Sites in Scotland, produced in 1990 as Circular No 17/1990, states at Appendix C 'Model Standards for Touring Caravan Sites: Introduction' Section 5. "These represent the standards normally to be expected, as a matter of good practice. The Secretary of State does not want them to be applied regardless of the economic or other implications for the site operators, for users, or for general public amenity. They should be applied with due regard to the particular circumstances of each site, including its physical character, any services or facilities that may be available within convenient reach, and other local conditions including the kind of holidays which the site is designed to offer. If use of the site is restricted to caravans equipped with their own toilet and washing facilities, common toilet and washing facilities may not be necessary and lower standards than specified may be desirable in some locations."

CAMpRA therefore proposes the use of these Model Standards for sites that are restricted to short stay use by self contained motor caravans. These sites to be known as Aires.

#### **Definitions**

A motor caravan is a vehicle meeting the EU Type Approval definition of a M1SP motor caravan, i.e. a motor vehicle with living accommodation space which contains the following equipment as a minimum:

- a. Seats and table.
- b. Sleeping accommodation which may be converted from the seats.
- c. Cooking facilities.
- d. Storage facilities.

This equipment shall be rigidly fixed to the living compartment. However, the table may be designed to be easily removable.

We propose that a self contained motor caravan must contain, in addition to the above:

- a. Onboard toilet, with integral waste storage, which may be fixed or portable.
- b. Onboard fresh water storage of sufficient capacity for the normal use of the occupants.
- c. Onboard waste water storage of sufficient capacity for the normal use of the occupants.

It is recommended that a suitable fire extinguisher & smoke alarm are installed.

#### **Proposal**

With regard to the 1990 Model Standards for Touring Caravan Sites sections we propose the following amendments:

##### **1. Site Boundaries**

This section is rewritten to state that the site boundaries, or area allocated to motor caravans, should be clearly discernible on the ground.

**Justification:** Amended to also apply where only part of a larger site is allocated to motor caravans.

## **2. Density and Spacing**

This section is renamed Density, Spacing and Length of Stay and rewritten, to limit the number of motor caravans permitted on the sites to a maximum of 10, and the maximum permitted length of stay to 48 hours with no return within 7 days. These limits may be decreased if desired, or increased by agreement between the local authority and land owner. If increased the additional facilities described in the relevant sections must be provided.

Every motor caravan must be not less than 3 metres from any other motor caravan. To achieve this it is recommended that a parking bay width of 5.5 metres is used. No vehicles, items or equipment are to be permitted within the space between motor caravans. No items or equipment are permitted to be placed outside the motor caravans with the exception of drive-on levelling ramps and a step for access to the vehicle. Attached levelling or steadying devices may not be used. Awnings may not be deployed.

**Justification:** When numbers are limited to no more than 10 self contained motor caravans the facilities associated with larger caravan and camping sites are not required. The sites are intended for short stays to enable users to visit local amenities and attractions. Users wanting longer stays are recommended to use formal caravan or camping sites.

The 1990 Model Standards for Touring Caravans specifies a separation of 6 metres between units and not less than 3 metres between an awning and an adjoining unit. We specify that awnings may not be deployed, and nothing may be placed between motor caravans, therefore a minimum spacing of 3 metres is acceptable. Ideally, bays should be permanently marked, with, where possible, barriers or surface marking to prevent the parking of vehicles between motor caravans in adjacent bays. The 1990 Model Standards apply to touring caravan sites accommodating towed caravans as well as motor caravans. It is not possible to easily move towed caravans out of danger, whereas motor caravans can be more quickly moved under their own power provided that equipment such as awnings and attached levelling/steadying devices are not used. CAMpRA has taken advice from an independent specialist fire safety advice company which has provided fire safety guidance appropriate to these types of site. (Appendix B)

## **3. Roads, Gateways and Footpaths**

This section is rewritten to state that adequate access for fire appliances must be maintained

**Justification:** When the sites are limited to a maximum of 10 motor caravans the prescriptive roads and footpath requirements are not necessary. When numbers and length of stay are increased, footpaths and roadways should be to the satisfaction of the local authority.

## **4. Fire Points/Fire Fighting Equipment/Fire Warning/Maintenance of fire-fighting and Alarm Equipment/Fire Notices/Fire Hazards**

These sections are replaced by Fire Precautions stating that a fire safety risk assessment must be carried out.

**Justification:** The current legislation covering fire safety in Scotland is the The Fire (Scotland) Act 2005<sup>1</sup> A guidance document has been published: CARAVAN & MOBILE HOME PARKS - FIRE SAFETY GUIDANCE FOR SITE OPERATORS<sup>2</sup>

Whilst general fire precautions can be imposed under the Fire Order, they can not be imposed by another Authority except the Fire & Rescue Authority. Therefore the conditions contained in the original Model Standards can no longer apply.

CAMpRA has commissioned, from an independent specialist fire safety advice company, guidance for carrying out a Fire Safety Risk Assessment appropriate to these types of site (Appendix B).

<sup>1</sup> <https://www.legislation.gov.uk/asp/2005/5/contents>

<sup>2</sup> [https://www.firescotland.gov.uk/media/1004171/caravan\\_mobile\\_home\\_guidance\\_website\\_release\\_sept\\_16.pdf](https://www.firescotland.gov.uk/media/1004171/caravan_mobile_home_guidance_website_release_sept_16.pdf)

## 5. Storage of Liquefied Petroleum Gas (LPG)

This section is removed.

## 6. Telephones

This section is removed

**Justification:** The 1990 Model Standards require a telephone to be provided if practical. With the virtually universal use of mobile phones this is no longer considered necessary. However the location of the nearest public telephone must be indicated on the site notice.

## 7. Electrical Installations

This section is rewritten to take account of current legislation.

**Justification:** Replacement of outdated requirements.

## 8. Site notices

This section is rewritten to more appropriately reflect the type of use of the sites.

**Justification:**

Information relevant to the type of use of the site is required and, because these sites may be unmanned, the conditions of use need to be prominently displayed.

### **Proposed additional sections**

The 1990 Model Standard for Touring Caravan Sites does not impose any requirements for drinking water supply, toilets, washing facilities, showers, or waste disposal. To bring the proposed Model Standards more into line with those proposed for England & Wales we have included the following sections:

#### 1. Drinking Water and Waste Disposal

**Justification:** As the sites are restricted to short term use by self contained motor caravans containing their own water supply it is not necessary for a drinking water supply to be provided. However, one may be provided if desired.

Similarly, self contained motor caravans have on board waste water storage so it is not necessary for a waste water disposal point to be provided. However, one may be provided if desired.

A recycling and rubbish storage and collection system may be provided.

Where more than 10 motor caravans, or stays of more than 48hrs are authorised, all the facilities in this section must be provided on site or nearby.

#### 2. Disposal Point for Chemical Toilets

**Justification:** Taking account of the limited length of stay permitted, and the on board facilities in self contained motor caravans, it is not considered essential for a chemical toilet disposal point to be provided however a disposal point for the contents of chemical toilets may be provided if desired.

Where more than 10 motor caravans, or stays of more than 48hrs are authorised, a toilet waste disposal point must be provided on site or nearby.

## APPENDIX B

### Fire Safety Risk Assessment Guidance

CAMpRA has taken advice from an independent specialist fire safety advice company which has produced a fire safety guidance document appropriate to these types of sites. To justify the spacing distances, we are using the information and references they have provided.

At present no official UK guidance is available specifically for separation distances for motor caravans on sites. The Confederation of Fire Protection Associations in Europe (CFPAE). They have issued guidance<sup>1</sup> for fire safety in camping sites, to reflect best practice developed by countries of CFPA Europe. Within the introduction it states "This guideline has been compiled by the Guidelines Commission and adopted by all fire protection associations in the Confederation of Fire Protection Associations Europe. These guidelines reflect best practice developed by the countries of CFPA Europe. Where the guidelines and national requirements conflict, national requirements must apply."

The UK is a member of this organisation.

As there are no UK statutory national requirements it is an appropriate standard to be applied. The specific guidance for spacing for motor caravans (referred to in the CFPA guide as 'Camper' – A self propelled vehicle used for overnight and dwelling purposes and 'Camping unit' - Caravan or camper including possible tent or similar) is "The free distance between each camping unit should be 3m, preferably 4m".

The requirement for 3m would also be in keeping with the 3m referred to within the 1983 Model Standards and the BRE Research<sup>2</sup> of ignition within 3m.

It should also be noted that the CFPA guide is still referring to campsites that allow the erection of awnings and camping equipment. Our proposed Model Standards are restricted to motor caravan parking with NO EXTERNAL EQUIPMENT, therefore no flammable material between the units. It would therefore be reasonable to require a 3 metres minimum spacing.

<sup>1</sup> CFPE No 20:2012 Fire Safety In Camping Sites: [http://www.cfpa-e.eu/wp-content/uploads/files/guidelines/CFPA\\_E\\_Guideline\\_No\\_20\\_2012\\_F.pdf](http://www.cfpa-e.eu/wp-content/uploads/files/guidelines/CFPA_E_Guideline_No_20_2012_F.pdf)

<sup>2</sup> BRE Information Paper IP 15/91, Fire Spread Between Caravans, September 1991, Building Research Establishment