

**Agenda for Car Parking Task and Finish Forum
Wednesday, 3rd March, 2021, 10.00 am**



Members of Car Parking Task and Finish Forum

Councillors K Bloxham, C Brown (Chair), M Chapman,
A Colman, O Davey, M Howe, B Ingham,
V Ranger (Vice-Chair), E Rylance and
J Whibley

East Devon District Council
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Venue: Online via the Zoom App

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(or group number 01395 517546)

22 February 2021

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- 1 Public speaking
- 2 Minutes of previous meeting (Pages 3 - 8)
- 3 Apologies
- 4 Declarations of interest
- 5 Matters of urgency
Information on [matters of urgency](#) is available online
- 6 Confidential/exempt items
To agree any items to be dealt with after the public (including the press) have been excluded.

- 7 A revised policy for Motorhomes and Campervans in EDDC Pay and Display car parks (Pages 9 - 47)

There is a discussion paper for the meeting from the Service Lead – Environmental Health and Car Parks.

[Decision making and equalities](#)

For a copy of this agenda in large print, please contact the Democratic Services Team on 01395 517546

EAST DEVON DISTRICT COUNCIL**Minutes of the meeting of Car Parking Task and Finish Forum held online via the Zoom App on 11 February 2021****Attendance list at end of document**

The meeting started at 10.00 am and ended at 12.30 pm

54 Public speaking

Liz McLean asked whether car parking charges would be increased to pay for electric car charging points as she was aware that other areas had electric charging points funded by private companies and government funding. She then asked what the predicted income for EDDC would be from electric charging points. She was concerned that an increase in parking charges would have a knock on effect for businesses.

Robert Kathro asked the TaFF to consider improving the impact that the increasing number of motorhomes had on Exmouth. He was advised that the TAFF would be meeting again on 3 March to discuss the subject of motorhomes and campervans.

55 Minutes of previous meeting

The minutes of the previous meeting held on 2 February were agreed subject to minute number 46, second paragraph being amended to clarify that the belief should be discouraged that motorhome owners could store larger motorhomes in car parks over the winter at a cost of an annual permit for £100. It was noted that current policy prohibited winter storage of motorhomes in car parks, and that motorhomes would be discussed in detail at the next meeting of the TaFF.

56 Declarations of interest

Declarations of interest.

Councillor Eleanor Rylance, Personal, Broadclyst Parish Councillor and a user of the The Green car park, Broadclyst.

Declarations of interest.

Councillor Kim Bloxham, Personal, Cranbrook Town Councillor.

Declarations of interest.

Councillor Maddy Chapman, Personal, Exmouth Town Councillor.

Declarations of interest.

Councillor Olly Davey, Personal, Exmouth Town Councillor and an investor in co-cars.

57 Matters of urgency

There were no matters of urgency.

58 Confidential/exempt items

There were no items which officers recommended should be dealt with in this way.

TOPICS FOR DISCUSSION

59 **The EDDC climate emergency declaration and action plan and the role of our car parking strategy in tackling this (with specific reference to investment in electric vehicle charging infrastructure and appropriate charging tariffs)**

The Service Lead – Environmental Health and Car Parks explained that the priority of providing plenty of affordable car parking in towns to encourage visitors to spend time and money in town centres was based on sound research and data. However, it was becoming clear that there was a climate emergency and that the Council had committed to an action plan to help reduce the local carbon footprint. This was also a priority for the Council and in conflict with the priority of encouraging motorists to drive to town centre locations.

It was felt that there was an opportunity for EDDC to begin to contribute to the infrastructure for electric vehicle charging infrastructure locally. There could also be opportunities to consider whether the tariffs were currently fit for purpose and encouraging the behaviours that were required to see emerging to help tackle the climate emergency. It was agreed that the timing of any measures was critical.

The Service Lead – Environmental Health and Car Parks suggested that there should be consideration given to a specific budget provision for the rollout of electric car charging infrastructure. A number of options were available across the industry and these were outlined in the Service Lead – Environmental Health and Car Parks' discussion paper.

The Service Lead – Environmental Health and Car Parks reported that EDDC had been working with other district council partners in a collaboration led by DCC, to provide appropriate infrastructure across the region to underpin and encourage the use of electric and plug-in hybrid vehicles locally. Current projects were:

1. DELETTI phase 1. Two fast charging bays to be provided in car parks in Exmouth, Honiton, Seaton and Sidmouth – 8 units in total – being delivered by a contractor and mostly funded through the European Development Fund. EDDC had committed £16,000 in total from existing budgets. There would be a financial return on the sale of electricity over the 10 year arrangement period.
2. DELETTI phase 2. Residential charging funded by an on-street residential charge grant fund. Officers would propose where appropriate charging point infrastructure could be installed, probably in the Green car park at Broadclyst, Brook Street Car Park Ottery St Mary and Lower Station car park Budleigh Salterton. There was unlikely to be an upfront cost to the Council. The phase 2 project was still at an early stage.
1. Exeter rapid charging project. An energy supplier (Gamma Energy) had successfully won funding from Innovate UK to work with EDDC and partners to supply, install and manage rapid residential on-street charge points. There would be no upfront cost to EDDC, with a 3% share of the increasing electricity revenue over a 15 year contract period. It was proposed that 20 50kW rapid charging units be installed and operated within East Devon, but time was critical so the authority was sought for the Service Lead – Environmental Health and Car Parks to present an urgent report to Cabinet seeking authority to enter into the necessary leases without delay.

During further discussion the following points were raised:

- There wasn't the need to invest lots of money upfront when providing electric charging points initially.
- If Council funds were invested then EDDC should see a return on that.
- Investment would be required to get what the Council wanted, where it wanted it.
- The public should not subsidise electric car users.
- There was rising demand for electric car infrastructure.
- There should be an even spread of electric car charging points across the district.
- DCC should be encouraged to improve its public transport infrastructure and use electric buses.
- The Government should be pressed to outlaw idling, particularly by buses in town centres.
- People stopping to charge their vehicles were likely to use the local facilities such as shops and cafes.
- Electric car charging points were critical to the survival of town centres. The convenient location of car charging points was a great method of regenerating town centres as people had to stop and pause whilst their car was charging.
- It could be a way of managing flow in short stay car parks.
- Trickle flow charges should be offered to those people who could not park and charge their cars at home.
- In London some lampposts had been converted to charging points.
- Charging provision for ebikes should also be considered.
- Consideration of electric car clubs and electric bike charging points would form part of the climate emergency response.
- There was a recognition nationally that the country would be using a lot more electricity and the challenge was how to balance that out as there was a move away from fossil fuels. The way people consumed electricity was going to change, with a much greater consumption.
- There was capacity in the National Grid.
- Double charging was very unpopular with electric car users.
- Electric vehicle users should be encouraged not to overstay and to leave their cars in the bay once it had been charged.
- Car parking tariffs had not been increased for 10 years and any increase in charges would not be to pay for electric charging infrastructure.
- Cranbrook Town Council had installed an electric charging point the previous day. It also leased an electric vehicle for use by the country park ranger. The Town Council did have a co-car, but it had been taken away through lack of use. However ebikes had proved very popular in Cranbrook.
- There was concern about overstaying charge points and whether a fine should be imposed. The Service Lead – Environmental Health and Car Parks welcomed the Forum's views on this and advised that an over-stay parking ticket was already in operation in Council car parks.
- There was a lot of national dissatisfaction over charging points not working. EDDC would be in a stronger position by working in a DCC collaboration. They would not be dealing with companies with a poor reputation.

RECOMMENDED:

1. that the Car Parking Task and Finish Forum endorses the ongoing work with DELETTI phases 1 and 2.
2. that the Service Lead – Environmental Health and Car Parks present a report to Cabinet as a matter of urgency seeking authority to participate in the Innovate UK funded Exeter Rapid Charging project to install and operate up to 20 rapid charging units in EDDC's public car parks this year.

3. that Cabinet also approve that EDDC should investigate the options for providing electric bike charging points and the provision of an ebike rental scheme.

60 **The use of cash and incentives to use alternative payment methods**

The TaFF gave consideration to the use of cash and alternative contactless payment methods in car parks. Contactless card payments, mobile phone payments and cash could currently be used in all council car parks. The revenue streams for online payments, card payments in car park machines (chip and pin and contactless) and pay by mobile phone were all increasing year on year. This has been exacerbated by the covid-19 pandemic, with forced behaviour changes and people using cash less. It was felt that people would naturally cease using cash.

It was noted that there were a number of issues associated with cash, including the cost of collection, along with the risk of theft and attempted theft (which resulted in large repair/replacement costs). The Forum agreed that the same price should be charged for a parking ticket, whatever payment method was used, but that administration and maintenance costs should be built into this.

The Service Lead – Environmental Health and Car Parks reported that five years ago a cashless/cardless car park was trialled in Beer, with people only being able to pay by mobile phone. This appeared to be unpopular at the time, but the use of contactless payment methods had increased since then. It was suggested that in future only cashless card machines be installed in car parks over the next few years when machines were being replaced. It was noted that visitors to the area tended to use cashless payments options more than local residents.

Digital transformation over the years now meant that customers could only purchase parking permits online, although there were technical issues at times and staff had to help some customers. The Service Lead – Environmental Health and Car Parks felt that the cash option in car parks should not yet be turned off. The Forum suggested that a pilot be undertaken whereby two machines in the same car park be used, one with the cash payment option being turned off and only card/mobile phone options being available, but with another machine in the same car park being available for cash purchases.

It was noted that soon Ringo would be the mobile app required for all on and off street parking across Devon.

Members felt that car parking signage was incredibly busy and at times confusing. A request was made for this to be 'slimmed down'. The Service Lead – Environmental Health and Car Parks suggested that revised simplified signage could be an issue for the TaFF to consider at a future meeting.

RECOMMENDED:

1. that in order to encourage the use of cashless payments in car parks a trial be undertaken in a car park with multiple payment machines, making just one machine available for cash use.
2. that the signage in car parks be reviewed by officers in order to simplify it, with revised wording being brought back to the TaFF.

3. that more prominent messaging be added to car park signage notifying East Devon residents of the annual permit available online.
4. that for the time being the same tariff be used for all payment methods.

61 **Alternative sources of revenue (events, advertising, private sector management options)**

The Forum discussed options for using council owned car parks to raise revenue, such as car boot sales, farmers markets, drive in movies and for advertising.

The Forum were asked for their thoughts and to what extent the opportunities should be explored. Members agreed that this could be good use for off peak times and for some little used car parks. It was important to be sensitive to local businesses who were paying fixed rates and to be sensitive to the local area.

Exmouth members expressed caution on using busy car parks and potentially detracting from the Strand café culture. Exmouth already had open areas such as Queen's Drive Space and Imperial Recreation Ground on which to hold events. The Service Lead – Environmental Health and Car Parks reminded members that the use of one of the car parks was given over for the use of the annual Exmouth festival. It was noted that the Council had flexibility to work with event organisers to do this.

The Service Lead – Environmental Health and Car Parks reported that there appeared to be little interest in advertising space in car parks at present. 'Back of ticket' advertising had stopped, which was likely to be a reflection of how people were paying for their tickets, with many using mobile phones and not receiving a ticket at all.

It was suggested that the Service Lead – Environment Health and Car Parks explore possible uses of car parks to raise revenue with the Council's Events Officer, and Economy Portfolio Holder as part of maximising use of Council assets.

RECOMMENDED: that the Service Lead – Environment Health and Car Parks, Portfolio Holder Economy and Events Officer investigate alternative sources of revenue through the use of car parks in East Devon.

62 **Any other matters and next steps**

The Vice Chair advised the TaFF that the next meeting would be held on 3 March 2021 to consider the issue of motorhomes and campervans.

A further meeting of the TaFF would be held, probably late March to discuss car parks that did not generate an income for the district council.

Attendance List

Councillors present:

K Bloxham
M Chapman
O Davey
E Rylance

Councillors also present (for some or all the meeting)

F Caygill
P Hayward
N Hookway
G Jung
D Ledger
A Moulding

Officers in attendance:

Andrew Ennis, Service Lead Environmental Health and Car Parks
Susan Howl, Democratic Services Manager
Alethea Thompson, Democratic Services Officer

Councillor apologies:

C Brown
A Colman
M Howe
B Ingham

Chairman

Date:

Car Parks TAFF Discussion Paper – 3 March 2021

A revised policy for motorhomes and campervans in EDDC pay and display car parks

1. Introduction

- a. In common with many other parts of the UK and the southwest region, here in East Devon we continue to see increasing numbers of campervans and motorhomes on our highways and in our public car parks. The pandemic may have even accelerated a trend towards independent UK holidays but it remains a fact that we are all seeing more and more vans of various kinds, ranging from an unconverted short wheel base panel van offering no accommodation other than a mattress or airbed in the load area right through to large fully self-contained high specification luxury motorhomes costing well over £100,000.
- b. Some of these visitors will have been looking for official licensed campsites but increasing numbers appear to be actively seeking the freedom of parking overnight in unauthorised locations. These may (or in some cases may not) be in circumstances that amount to contraventions of either on-street or public car park rules and regulations. Equally, the behaviour of the occupiers of these vehicles may (or may not) be detrimental to the locality (perhaps through waste water discharge, domestic refuse disposal, visual amenity, loss of parking space, noise and obstruction of pavements or highway with items such as tables, chairs, barbecues, water sports equipment, fire wood etc.

2. Current Policy

- a. In 4 March 2015, this Council approved a [policy](#) (see appendix 1) that prohibited the parking of motorhomes and campervans in any of our public car parks between the hours of 22:00h and 08:00h the following day.
- b. Prior to the introduction of this policy, this Council used to have simple rule in our Parking Places Order that specified “no overnight sleeping” in our car parks but this rule has widely been acknowledged in the industry as being almost impossible to enforce. By 2015 we had also seen a new problem emerge – with our inexpensive permit tariffs (now just £100 per year) we were inadvertently encouraging local motorhome and campervan owners to use some of our car parks as a cheap storage facility for their vehicles when they were not in use – with the resultant pressure on parking availability for visitors and town centre shoppers. Accordingly Cabinet considered papers that I had prepared and made decisions that this Council:
 - i. wished to encourage day visitors in motorhomes and campervans – so these vehicles are currently allowed to use any car park on any day but only between 08:00h and 22:00h daily)
 - ii. was interested in a pilot scheme whereby we would consider the impact of allowing overnight “camping” for up to 3 consecutive nights in specified car parks in Exmouth (this pilot is about to enter its third season at the request of Exmouth Town Council) and that overnight parking of any campervan or motorhome would not be allowed in any other car park (to prevent both storage and overnight camping).

3. The Issues

- i. The Exmouth pilot has been interesting and I would ask Members to accept that our 2015 policy is now in need of a revision to recognise both the continuing demand for short term overnight pitches for campervans and motorhomes in our towns and rural areas along with the issues and tensions that are arising in our communities as these vehicles continue to “find” on-street locations for overnight parking.
- ii. We do already see evidence of overnight stays in car parks that had not been included in the Exmouth pilot and I would invite Members to consider whether it is this Council’s role to acknowledge that measures to carefully and sensitively fulfil this demand (rather than continuing to treat overnight parking as a “parking contravention” or some form of “anti-social behaviour”) may well have benefits for both our town economies and for our own revenue.
- iii. There is also the relevant consideration of other alternatives available for these visitors. Many of them as we know are already choosing on-street locations (I have recently been told of ongoing issues at Exmouth seafront and nearby residential areas such as Foxholes Hill and the Avenues, residential areas around Seaton seafront and Seaton Hole along with other locations in Beer and Sidmouth. I feel sure there will be others. The long-term answer to this issue must of necessity involve further engagement with our colleagues in Devon County Council’s Highways’ team but to date, the message I have received is that overnight parking at many locations appears to be lawful.
- iv. It is also the case that our own residents are choosing small and medium sized camper vans as either their main or second vehicle and in some cases our own policy currently prevents them from parking overnight in public car parks close to their own homes.
- v. There is also an important debate to be had around the extent to which this Council wants to intervene in this matter.
- vi. The pilot has raised a number of as yet unresolved questions around the rules and regulations that would need to be imposed on any sites where we decide it would be appropriate to allow overnight stays. It is also important that we consider what level of facilities we want to offer our customers and of course, the possible consequences of encouraging overnight stays in the absence of such facilities. I am of course referring to fresh water provision, waste water disposal, domestic refuse disposal, electrical hook ups, outdoor space (for tables, chairs, barbecues etc.) and of course fire safety and the separation between vehicles. A degree of self-regulation may of course be assumed but depending upon the level of our offer, I would recommend that we build in suitable and sufficient resources to properly manage and where necessary enforce compliance with our rules and regulations.

4. Recommendations

Within this forum, I would ask Members to provide policy guidance and to recommend a broad strategic framework for our work in this area, setting out the Council's position in respect of the following:

4.1 Day visitors

No change seems necessary to our present policy. Visitors and residents may use any of our public car parks but if their vehicle is unable to park wholly within one of our standard parking bays (2.4m x 4.8m) then they must parking with care. If the vehicle is left in such a way that it prevents another vehicle from using any of the other parking bays then those bays must also be paid for by purchasing two or more simultaneous parking sessions and displaying all tickets on the windscreen accordingly. Alternatively if a vehicle "overhang" can be safely accommodated over (say) a grass verge without obstructing safe pedestrian passage then this vehicle may park for payment of a single parking session. Longer vehicles may NOT be left protruding out into the general circulation areas of the car park and where relevant, should never overhang the pavement or carriage way or an adjacent highway. Contraventions discovered by our Civil Enforcement Officer will be enforced by a penalty charge notice under Civil Parking Enforcement rules.

4.2 Short break overnight stays

I propose that overnight stays in car parks can be allowed (subject to strict terms and conditions of use) in any of our pay and display car parks that are "deemed suitable" in consultation with Ward Members and the relevant Town or Parish Council. It may be appropriate to allow overnight stays of up to two or three consecutive nights in suitable locations. The Exmouth pilot has been broadly successful insofar as we now know that there is a significant and growing demand from our visitors for short duration "aire" style facilities in East Devon's public car parks. It is arguable that short duration stays by vans with self-contained on-board facilities are equipped for short stays in any location and we do not necessarily need to offer anything more than a suitable parking space. However, we may wish to consider providing drinking water facilities and domestic refuse disposal facilities, those costs being covered by new overnight charges.

4.3 Fire Safety

The Council must only allow overnight stays in circumstances that are compliant with relevant fire safety legislation. We will therefore need to manage our car parks in accordance with the appropriate guidance on the safe separation of vans staying overnight. This is a significant factor and despite our "advisory notices" on site during the Exmouth pilot, the reality has been that customers have chosen to park closer to other vehicles than it is safe to do. By formally allowing overnight stays, the Council is not creating a campsite and licensing conditions do not apply. However, the Regulatory Reform (Fire Safety) Order 2005 would apply to the car park site (although not to individual vehicles that parking there because there is an exemption for vehicles that are licenced for use on the road (under the Vehicle Excise and Registration Act 1994) where separate controls apply. We are advised that the sensible "safe" separation for visiting motorhomes and campervans should be at least 3metres. This means that in effect overnight parking would only be allowed in a 2.4 metre wide bay where there are then two empty bays between that vehicle and the next vehicle. This separation is not required during daytime hours and compliance with this

requirement between 22:00h and 08:00h would appear to be a practical way forward. In a purpose built facility (see 4.6 below), this would mean a 2.5m wide parking space would allow a vehicle to park and the occupants to exit the vehicle. With an additional 3 m (1.5 m either side) would mean that no vehicle is less than 3 m apart. Therefore, the total width of the parking bay would be 5.5 m. More information is available [here](#) and has been reproduced in appendix 2.

4.4 Tariffs

I propose that motorhome and campervan customers will NOT be eligible for purchasing any of our standard car park permits and (subject to special arrangements for the residents' scheme proposed below) will only be permitted to use our pay and display car parks on a "pay as you use" basis.

An appropriate tariff to reflect the value of these "casual" overnight stays in approved car parks (where no other facilities are provided) for one, two or three consecutive nights only (with no return permitted within 24 hours) need careful consideration.

Locally tariffs vary according to demand. I have reviewed current offers around Devon and Dorset via internet searches and it is clear that a customer seeking a 2-night stay on a pitch within a traditional out of town site in July or August will expect to be paying something of the order of £60 to £70 for those two nights. The same pitch in early March (there is already limited availability) could be as low as £15 for the two nights in certain locations.

I believe we will be hearing representations from a number of motorhome customers advocating the French "aire" or German "stellplatz" which are typically inexpensive and not managed by a site warden.

In my view, our current tariff of £11 per night in the Exmouth pilot is deliberately inexpensive (bearing in mind that it also includes 24 hours parking in a prime location). It was based on the previously charged on-street tariff so that the pilot did not act as a deterrent and sought to encourage existing visitors to relocate from the desirable seafront highway parking spaces into a less intrusive location within an off-street car park.

Whilst a charge somewhere between £20 and £35 for 24 hours (to include an overnight stay) is attractive on the face of it, we do need to carefully balance this with the risk that the charges will either drive-away visitors to other areas – or will displace them back to other on-street locations where a range of unintended consequences might arise.

4.5 Arrangements for local residents

Residents will still be unable to purchase a parking permit to use our public car parks for long-term storage of motorhomes and campervans when they are not in use. However, we will on a case-by-case basis consider "exemption" permits for residents who can demonstrate that they rely on a small campervan as their regular daily transport and that they do not have suitable alternative off-street parking facilities available elsewhere. One safeguard that we can introduce is to make it a condition that the exemption will only apply in areas where the resident lives in close proximity to the car park in question and where the vehicle is registered and insured in their name at that home address.

4.6 Dedicated sites

Officers would also like to explore the possibility of creating dedicated motorhome / campervan pitches within sites with appropriate facilities to allow longer stays and for which a premium overnight rate comparable with commercial campsites could be charged.

We would propose beginning a formal consultation process with local Members and Natural England this winter to consider the impact of the first such development on the site of Exmouth's former lorry park adjacent to the Estuary. The implementation of this would be subject to further consideration by Members in due course in terms of financial investment decisions and might also need to be the subject of a planning application depending on the exact details of the change from "Lorry Park" to "camp site"

motor home parking policy

1. Introduction

- a. District Council car parks are a popular choice for both new and returning visitors to our towns and beach resorts. On-street parking is often time limited and scarce whilst in contrast, Council off-street car parks are generally well run, well signed, in the right place, spaces are usually available and prices are fair and reasonable.
- b. Motor homes are now emerging as a popular alternative to more traditional visitor accommodation choices such as hotels, bed and breakfast establishments and cottages and almost half of all local authorities have now recognised that drivers of motor homes are interested in visiting their towns and resorts and are on the lookout for suitable off-street parking in the vicinity of their chosen destination. Certain on-line forums are already linking to the “offer” of suitable motor home parking on Council websites with the clear inference being that such factors are decisive in motor home users’ choice of short-break or holiday destinations.
- c. Many of our neighbouring Councils now have clearly stated policies on motor home parking. Some (including Torridge District Council and Teignbridge District Council appear to encourage limited overnight camping in car parks but others including Plymouth, Torbay, South Hams, West Devon all make it clear that they welcome visitors in these larger vehicles in certain car parks but expressly prohibit overnight camping or sleeping in motor homes in any of their car parks.

2. Day visitors

- a. East Devon does attract a variety of visitors and it is a matter of fact that over the last few years we have witnessed an increase in the popularity of motor homes and we are seeing them in our towns and coastal resorts more and more frequently. This means inevitably that the drivers of these larger vehicles are already seeking suitable off-street parking in our car parks when they visit our towns.
- b. Some of our car parks can accommodate small and medium sized vehicles in a single marked bay, perhaps with an acceptable overhang across a grass verge. Others can accommodate vehicles across two adjacent bays and informally we have always allowed drivers to purchase two pay and display tickets to allow them to park in this way.
- c. At Beer Head, the grass surface car park has no bay markings and motor homes frequently park there without issue.

- d. It is likely to be in the best interests of our town centre economies to encourage the drivers of such vehicles with a clearly stated policy and to make specific provision for daytime parking in designated car parks.

3. Overnight Parking

- a. It has been the subject of occasional complaints over the last couple of years that from time to time, drivers of motor homes and campervans (of various shapes and sizes and in various states of repair) do take the opportunity to park overnight and it is suggested “camp” in our car parks.
- b. This seems to have been a particular issue in Estuary car park in Exmouth, Manor Road car park in Sidmouth and Beer Head car park. Whilst our Parking Places Order does not prohibit overnight parking, it does prohibit overnight sleeping. I think it is clear that the enforcement of this restriction is by no means straightforward and a CEO would need to establish that not only is the vehicle occupied but that someone had actually slept in the vehicle overnight in order to prove the contravention.
- c. In the past a pragmatic view has been taken leading to the custom and practice that if a vehicle is clearly parked in a suitable location and the correct parking fee has been paid with the ticket on display, then no further investigation would be carried out.
- d. We now need to adopt and enforce a policy that restricts motor home parking to those hours that might reasonably be required by a legitimate visitor to our area. A restriction allowing parking only between 08:00h and 22:00h daily would be appropriate. This then presents a straightforward enforcement protocol in which a CEO need establish only that a motor home is present within a car park on any day before 8am.
- e. Overnight parking is prohibited in order to encourage the users of those vehicles to enjoy the facilities on offer at legitimate local licensed caravan sites for overnight sleeping.

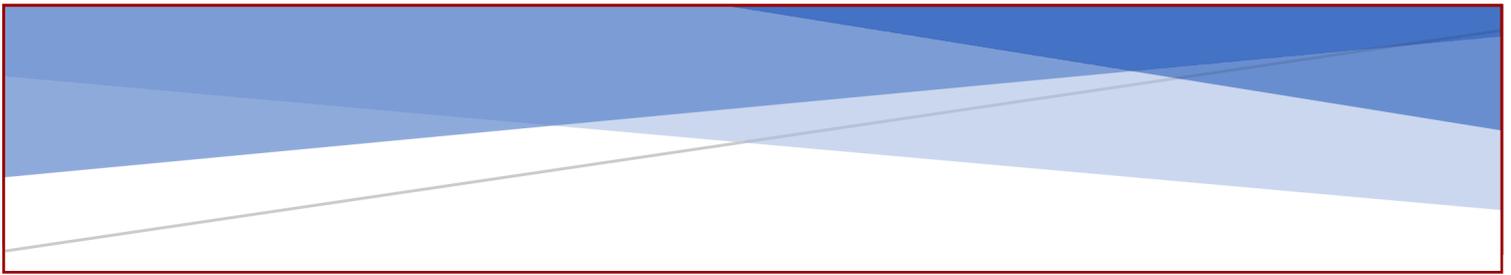
4. Long Term Parking

- a. The use of certain car parks for what is effectively the “storage” of large motor homes is inappropriate and on occasions can significantly restrict the availability of parking for town visitors. This has become a particular issue in Seaton’s Orchard car park where it was not uncommon during 2013 to find 15 or 20 such vehicles occupying (or partly blocking) 30 to 40 spaces in this 168 space car park.

- b. Seaton residents have already expressed concerns over the likely loss of more than half of Harbour Road's 367 spaces once development of the Discovery Centre gets underway in 2014 and we anticipate a shortage of visitor parking for the town thereafter.
- c. The issue is also apparent to a lesser extent in other towns and invariably the vehicles concerned are displaying a town/area parking permit that currently costs just £120 for a whole year. This compares very favourably with commercial prices for "secure" storage which I understand tend to be of the order of around £2 per night or £400 to £500 per year.
- d. A restriction on motor home parking in our car parks which limits the hours of parking to between 08:00h and 22:00h daily will deal effectively with the long term parking / storage issue and will compel motor home owning residents without suitable private parking facilities of their own to secure an alternative. This mirrors our existing policy on caravans.

5. Policy

- a. The following car parks shall be designated "approved" for motor home parking: Exmouth: Estuary and Maer Road, Budleigh Salterton: Lime Kiln, Sidmouth: Manor Road, Ottery St Mary: Land of Canaan, Honiton: Lace Walk, Axminster: West Street and Poplar Mount, Beer: Cliff Top, Seaton: The Coach Park.
- b. A number of these car parks already contain marked parking bays large enough to accommodate some motor homes and where a motor home can park entirely within a marked bay, the motor home will be permitted to park there in accordance with the usual terms and conditions of that car park and at the standard tariff. Longer or wider vehicles finding themselves unable to fit into a marked bay will be required to pay for the number of bays they are effectively occupying (including any that they are preventing other customers from occupying) and failure to display the required number of pay and display tickets will result in enforcement action. It is envisaged that a very long and wide motor home could conceivably need to occupy four bays simultaneously but the vast majority of vehicles currently in use will fit comfortably into two adjacent bays and many will be able to use just one.
- c. To implement this policy the East Devon Parking Places Order will allow parking of vehicles captured within the definition "motorcaravan" to park only in "approved" car parks and only between the hours of 08:00h and 22:00h on any day.

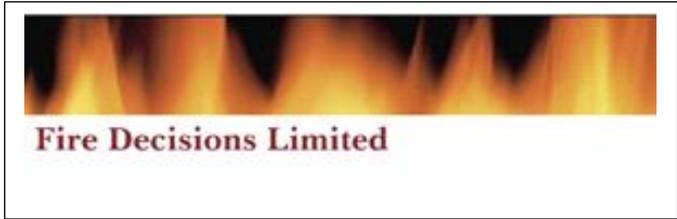


FIRE SAFETY REPORT

Motor Caravan Overnight Parking

Abstract

Fire Decisions Limited has been commissioned to provide technical fire safety information around the use of non licensed caravan sites for a limited period of time for motor caravans only . This report covers the key aspects around the management of fire safety and related legislation only



FIRE SAFETY REPORT

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Introduction

As motor caravan use in the UK becomes more popular, additional areas that are not formal campsites are being sought out by users of self contained motor caravans.

Within mainland Europe most towns and areas have sites for motor caravans to stay for one or two days, sometimes free (to encourage visit to the local community) and sometimes at a small charge. These are called Aires in France for example and stellaplaz in Germany. Unlike campsites they have few facilities and no warden.

One of the biggest concerns about setting up similar areas within the UK is the issues around fire safety.

The purpose of this report is to detail the main fire safety issues and guidance.

Whilst this report is written based on the legislation and guidance for England and Wales, a similar regulatory regime exists for Scotland and Northern Ireland.

Fire Safety Legislation

The Regulatory Reform (Fire Safety) Order 2005 [Fire Safety Order] is the main fire safety legislation in England and Wales and this came into force on 1st October 2006. There is similar legislation for Scotland.

The Fire Safety Order applies to virtually all buildings, places and structures other than individual private dwellings e.g. individual flats in a block or family homes. It also does not apply to vehicles that a licence is in force for, under the Vehicle Excise and Registration Act 1994.

The legislation is enforced by the Fire & Rescue Service, It is a criminal offence not to comply with the relevant Articles of the Fire Safety Order.

The Fire Safety Order places the emphasis on risk reduction and fire prevention. Under the Order the person, known as “the responsible person,” is required to:

- Take general fire precautions,
- Carry out a fire risk assessment to identify dangers and risks,
- Have in place fire safety arrangements,
- Consider means of fighting a fire and raising the alarm in case of fire,
- Protect the means of escape,
- Maintain general fire precautions, and facilities provided for use by fire-fighters,
- Review the findings of the risk assessment, when necessary.

The Fire Safety Order defines the responsible persons as; for a workplace, the employer and in all other premises the person or people in control of the premises. If there is more than one responsible person in any type of premises, all must take all reasonable steps to work with each other.

The Fire Safety Order also uses the term ‘relevant person.’ This is defined as “any person (including the responsible person) who is lawfully on the premises and any person in the vicinity of the premises who may be affected by a fire on the premises.”

Application of the Fire Safety Order to a Short Stay Overnight Motor Caravans Parking Area.

Once an area is used for overnight parking of a motor caravan with overnight sleeping accommodation, then Regulatory Reform (Fire Safety) Order will apply [referred to as "The Fire Safety Order"] and as in the case of a campsite, additional measures will be required under the Fire Safety Order.

As the motor caravans using the site will all fall under the exemption for road vehicles, then it is only the site itself that the Fire Safety Order will apply to.

This could be seen as a similar situation as a block of flats. Each flat as a dwelling does not fall under the Fire Safety Order, however the common parts like the staircase and corridors under the control of the owner do fall under the Order.

As a short stay overnight parking area, it is likely that no one is employed to work there and so there is no employer for the site. Under the Fire Safety Order if there is no employer, then the responsible person will be the person who is in control of the site, in most cases this will be the owner of the land.

There is a requirement for the responsible person to carry out a fire risk assessment under the Fire Safety Order.

The key area for overnight accommodation areas is the requirement under Article 8 of the Fire Safety Order. (Note the Regulatory Reform (Fire Safety) Order does not have paragraphs or sections but is divided into a number of 'Articles'.) and the Duty to take General Fire Precautions. This Article states that the 'Responsible Person' must;

"in relation to relevant persons who are not his employees, take such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe."

This means the owner of the area must take into account the requirement for general fire precautions for the area considering people who may be there, especially those sleeping.

General fire precautions are defined in Article 4 of the Fire Safety Order as;

1) *In this Order "general fire precautions" in relation to premises means, subject to paragraph (2)—*

- (a) measures to reduce the risk of fire on the premises and the risk of the spread of fire on the premises; [my emphasis added]*
- (b) measures in relation to the means of escape from the premises;*
- (c) measures for securing that, at all material times, the means of escape can be safely and effectively used;*
- (d) measures in relation to the means for fighting fires on the premises;*
- (e) measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises; and*
- (f) measures in relation to the arrangements for action to be taken in the event of fire on the premises, including—*
 - (i) measures relating to the instruction and training of employees; and*
 - (ii) measures to mitigate the effects of the fire.*

Paragraph 2 refers to workplace process fire safety measures and is not relevant here.

However, the risk of spread of fire is within the control of owner. This can be controlled by providing adequate spacing between vehicles. This is the crux of the issue within this report.

As an open motorhome parking area, means of escape and means for securing the means of escape are not applicable. Firefighting equipment and means for detecting and giving warning are covered elsewhere in this report, along with the arrangements to be taken in the event of fire.

To help the responsible person, the Government has published a number of guidance documents for different types of premises. These guides have a special legal status, although they are not an approved code of practice, they are the bench mark standard the fire service will use when considering the necessary fire precaution matters.

The primary guide that will apply to any motorhome parking area will be the HM Government Guide "sleeping accommodation". This is the correct guide to be applied, because in the introduction under "who should use this guide?" it states that; "the premises addressed in this guide include *camping, caravan holiday parks (other than privately owned individual units)* "

Risk of Fires and Fire Spread in Motor Caravans

Due to the nature of a motor caravan, with an internal combustion engine, cooking and heating facilities along with electrical and other gas devices, there will always be a risk of fire.

Looking at the most recent copy of the UK Government Fire and Rescue Service Incident Statistics for England shows that between May 2019 and June 2020 there were;

Vehicle type	Primary fires			Fire-related fatalities			Non-fatal casualties		
	Total	Accidental	Deliberate	Total	Acc	Del	Total	Acc	Del
Total	20,539	10,709	9,830	16	6	10	549	487	62
Car	12,674	6,723	5,951	12	3	9	274	233	41
Motorcycle	2,214	304	1,910	0	0	0	23	17	6
Van	2,142	1,156	986	1	1	0	54	52	2
Lorry/HGV	851	785	66	1	1	0	19	19	0
Bus/Coach	250	230	20	0	0	0	76	76	0
Agricultural vehicles	638	602	36	0	0	0	12	12	0
Other road vehicles⁵	1,770	909	861	2	1	1	91	78	13

5 Other road vehicle includes: Bicycle, Caravan on tow, Caravan unspecified, Minibus, **Motor Home**, Multiple vehicles, Other, Tanker, Towing caravan elsewhere and Trailers.

It is not possible from the data to breakdown any further the "other road vehicles" from the data supplied from the Government, which in turn comes from Fire and Rescue Services, specifically into motor homes (motor caravans).

Some recent examples of motor caravan fires though, are available by searching on the internet.

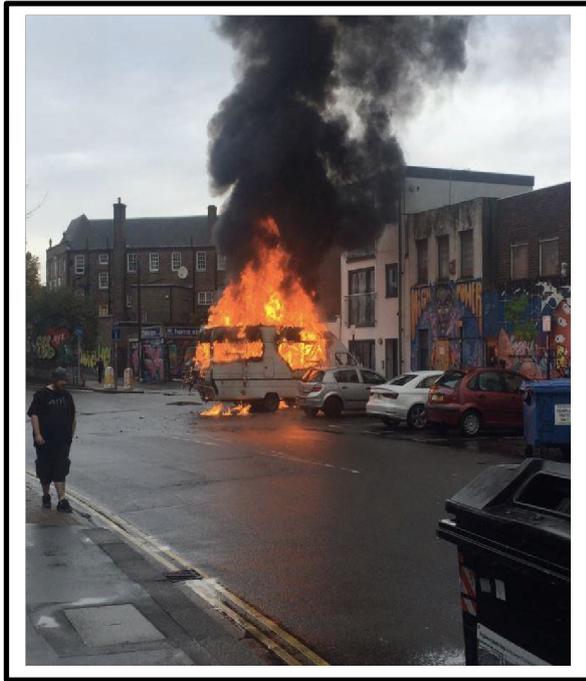


Photo 1 Brighton November 2016 Motor caravan on fire
Parked in a street

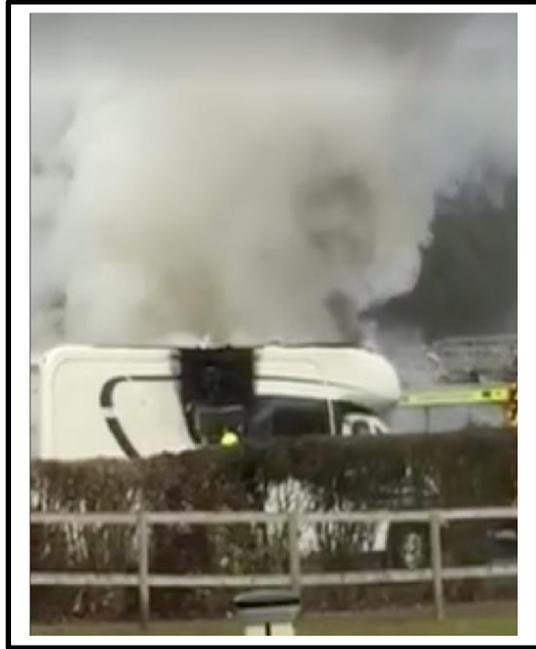


Photo 2 Motor caravan home on fire in caravan site
Brighton December 2016



Photo 3 Cheltenham July 2017



Photo 4 A35 Devon January 2018



Photo 5 Deal, Kent August 2019
(Note how flames and heat is upwards rather than sideways)



Photo 6 M6 Staffordshire September 2019

Like most vehicles, there is a risk of ignition whilst driving due to a mechanical faults, as 2 of the examples above show.

As well as individual motor caravan fires, it is possible for a fire to spread from one vehicle to another. In all document cases available at the present time, these relate to motor caravan and caravans that have been stored close together, either at commercial storage facilities or dealers forecourts.

Below are a number of examples of these. In all cases the vehicles are parked closer together, with separation distances of about 1 metre.

Commercial Motorhome Dealers East Sussex

An electrical fault in a motor caravan caused a fire to start, which spread to adjacent vehicles. In total six motor caravans and two caravans on a retail premises were completely destroyed by fire and a further eight motorhomes were damaged by radiated heat and smoke.

The fire started in the early morning when the premises were unoccupied and was captured on a security CCTV camera located on a pole in the centre of the site.

The camera footage showed that the headlights of a motor caravan had come on minutes before it ignited. This motor caravan was an older second-hand vehicle and it had been parked in the same position for about three weeks prior to the fire.

Due to severe fire damage, it was not possible to identify the exact origin of the electrical fault.



Photo 7 from ESFRS CCTV of the fire



Photo 8 from ESFRS note spacing between vehicles

Motor Caravan and Caravan Storage Facility

Wales, May 2016. An accidental fire at a motor caravan and storage facility destroys 18 motor caravan and caravans and damages a further 13.



Photo 9

Commercial motor caravan and caravan dealers

A suspect arson attack on a commercial motor caravan and caravan dealers on the Kent/East Sussex Boarder in October 2017. 20 motor caravans and caravans damaged in the fire.



Photo 10 Note the separation distances between vehicles

Motor caravan rental depot Essex

March 2019. An accidental fire at a motor caravan hire storage facility destroys 17 motor caravans and 10 caravans. The moto caravans were unoccupied at the time. The fire is believed to have started as a result of a defect in a gas powered fridge. The site was covered with CCTV and so the progress of the fire can be seen and the times for fire development noted, with regard to spread.



Photo 11 First indication of fire



Photo 12 6 minute 22 seconds after ignition



Photo 13 16 minutes 26 seconds after ignition, Sufficient light from flames causes CCTV to switch, To daylight mode, still no fire spread.



Photo 14 18 minutes from ignition, flare-up occurs, likely tyre bursting



Photo 15 18 minutes 34 seconds no fire spread to Adjoining van



Photo 16 After 4 fireballs, tyres bursting etc. at 22 minutes additional vehicles are involved.

The Fire Service are seen to arrive 39 minutes after first ignition noted on CCTV but fire not discovered for over 20 minutes, so arrival time is approximately 19 minutes from time of call.

Whilst there is a lot of information available on fires that have spread between motor caravans and caravans, in each case they have been at commercial premises where no persons would be sleeping in the vehicles. As a consequence the vehicles have been parked closer together to maximise the available commercial space.

Research has been carried out previously on the risk of fire spread between Park Homes and Holiday Homes (Park Home being a home used as permanent residency and a holiday home being a large residential type caravan permanently kept on a camp site but only used during the holiday season. Also see *Carter v. Secretary of State for the Environment* [1994] for definition of park home).

This research was carried out by the Building Research Establishment (BRE)IP15/91 in 1991 and led to the distances detailed in the Model Standards for caravan sites. The research found that, due to the plywood skin of the park home, a separation distance of 6 metres is required to prevent fire spread, and for a holiday home a distance of 5 metres is required with 3.5 metres at the corners. No combustible material should be within 3 metres.

This figure of 6 metres for park homes is now a frequently quoted figure.

The BRE have also undertaken research on fire spread in car parks (BD 2552). In this case it is only with regard to motorcars and mpv type vehicles and is not applicable in this case.

Commentary

Firstly, the BR*E reported with the much quoted figure of 6m needs to be understood fully in context. The Building Research Establishment tests (copy attached as **Appendix 2**) did not involve touring caravans or motor caravans, however this research is helpful in giving guidance on when ignition is likely to occur to a second item. The ignitability test research found that “the wall structure of an aluminium skinned holiday caravan did not ignite at irradiance below 50kW/m²”.

In the test fire for the holiday caravan, the peak irradiance at 3m never exceeded 40kW/m² during the 30 minute test and peaks at this level approximately 12 minutes into the test. This compares to the park home (wooden structure) which had a peak irradiance of 80 kW/m².

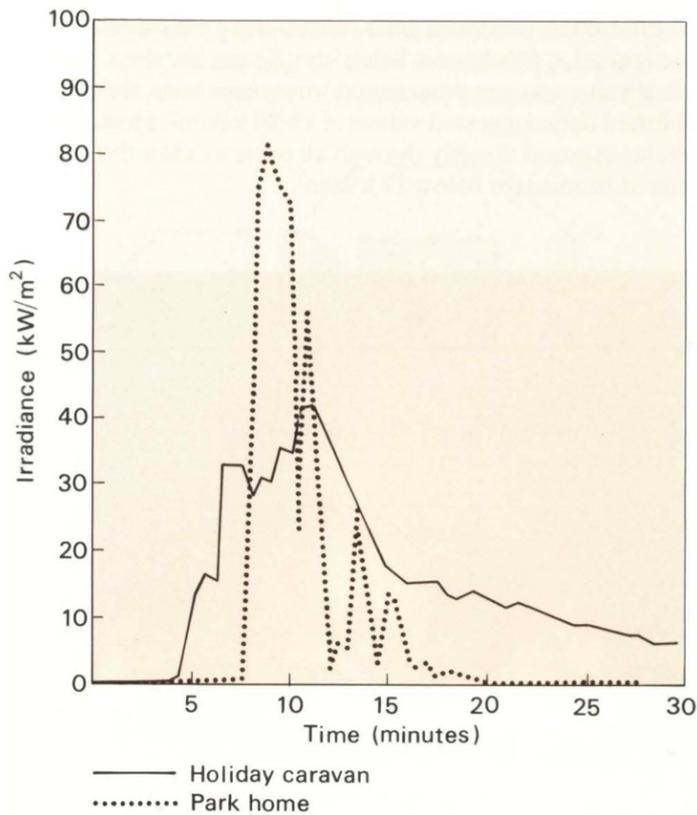


Figure 1 Heat radiation (irradiance) recorded 3m from each unit

(From BRE IP 15/91)

The reason for the difference in the heat output is explained in the way both units burn. The roof of the holiday caravan failed very quickly allowing the fire to burn upwards, drawing air (oxygen) through the doors and windows that failed. The park home, with a more robust roof structure, did not behave in the same way. The roof remained intact for sometime and so the flames jetted from the doors and windows, resulting in a more severe fire and a greater amount of radiated heat.

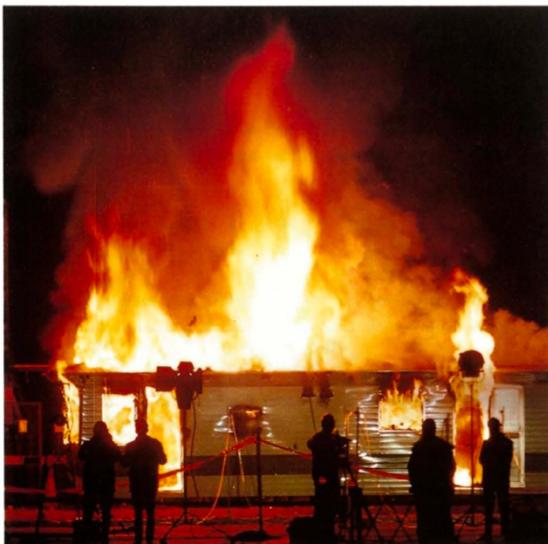


Figure 2 Holiday caravan after six minutes

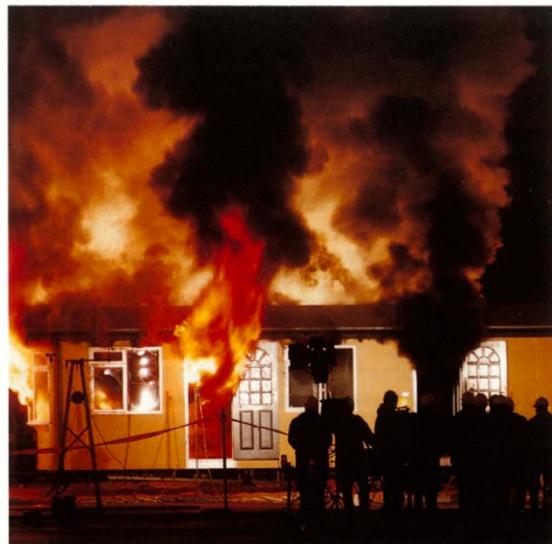


Figure 3 Park home after six minutes

It is worth considering the test results in comparison with recent real fire cases for motor caravans. Firstly the construction of motor caravans is substantially different to park homes, (timber), and holiday home construction of the late 1980's. The tests being carried out in 1991.

As can be seen in the photographs for all the single motor caravan fires and the early stage of the hire site fires, photos 1, 2, 4, 5, 6, 13 & 16 above. Motor caravan fire occur in a similar way to the holiday home. In that once the fire has sufficiently developed, the fire spreads upwards, with failure of the roof. Not unexpected as nearly all motor caravans will have some form of opening in the roof. This means that there is limited flame jetting from doors and windows.

Where recorded cases of fire spread between motor caravans has occurred, it has been at night in sites where the fire has not been discovered for some considerable time and the motor caravans are closer than 3m to each other.

This is unlikely to occur in any of the sites proposed, as each site will by the very nature of its use, have persons presence. In the (unlikely) event of a motor home fire occurring and the occupant of the vehicle concerned not being able to raise the alarm, due to incapacitation etc. Then the adjoining occupants are likely to be made aware of the fire, due to the sounds of the fire in the later stages, such as tyres bursting etc. The light of the fire or their own smoke alarms sounding as pyrolysis occurs. In any of these cases, sufficient time will be given for the occupants to escape and there would be time for any other adjacent vehicle to be moved.

These case histories when combined with BRE test results shows that the risk to life safety from a fire spreading from beyond the motor caravan or origin is low. In addition where there is sufficient distance between vehicles, fire spread is unlikely to occur.

Guidance on Separation Distances

Having established that there is a risk of fire spread between motor caravans that are parked too closely together, the next area to consider is what, if any guidance is available to the responsible person and enforcing authorities regard separation distances.

Under the Fire Safety Order, the benchmark standard normally applied, is that detailed in the relevant DCLG guidance, in this case the DCLG guide for sleeping accommodation.

This guide does mention the risk of fire spread and states on page 50;

"Fire can spread rapidly between caravans and between tents, if they are too close. separation distances between units should be applied, e.g. 6m spacing for park homes. Further guidance on caravan and tent fire precautions can be found in BS 5576, circular 14/89 Model Standards and BRE IP 15/91."

This guidance about 6m is specifically for **Park Homes**, and is not relevant in this case as they are constructed differently and have a different fire loading, as shown in the BRE tests, which are referred to within the DCLG guide and are previously covered in this report.

The British Standard mentioned, BS 5576 is the "Specification for fire safety features of camping tents, awnings, trailer tents and caravan awnings" and again is not relevant.

This leaves the Model Standards. These Model Standards are produced under the Caravan

Sites and Control of Development Act 1960. Within the DCLG Guide reference is made to the 1989 Model Standards. This standard only applies to Holiday caravans, these are the large static type caravans, but only used during part of the year, rather than as a permanent residential accommodation. These standards reflect the BRE research regarding separation, under density it states;

"The minimum spacing distance between caravans made of aluminium or other similar material with similar fire performance properties should be not less than 5 metres between units, 3.5 metres at corners... ..Where awnings are used, the distance between any part of the awning and an adjoining caravan should not be less than 3 metres"

The 1989 Model Standards still apply for holiday caravans but for permanent sites, i.e. those where people live in them all year round as their main home, they have subsequently been updated in 2008. However, the 2008 Model Standards only apply to permanent sites as opposed to holiday home or touring type sites.

This is confirmed within the introduction, which states;

"These standards only apply to those sites which contain caravans that are used as permanent residential units. They do not apply to sites used exclusively for holidays or touring caravan sites"

There is a similar comment in the 1989 Model Standards about them not applying to touring caravan sites.

There is a 1983 Model Standards for touring caravan sites. This details a number of criteria for sites including number of toilets, requirement for telephones, number of taps etc.

There is a section on spacing, which states that;

Every unit should be not less than 6 metres from any other unit in separate family occupation and not less than 3 metres should be permitted between units in any circumstances.

Vehicles and other ancillary equipment should be permitted within the 6 metres space between units in separate family occupation but, in order to restrict the spread of fire, **there should always be 3 metres clear space** [my emphasis added] within the 6 metres separation.

Of interest is that the DCLG guide does not reference the 1983 standards, there are no records of these 1983 standards being updated, given that they are now some 34 years old. It is not clear within these Model Standards if this requirement for 6 metres is for fire safety reasons or for other reasons. Given that it states that there should "always be 3 metres clear space" this would seem to imply that fire spread requirement is 3 metres. This would be further supported when the requirements for holiday caravans within the Model Standards are compared. This allows 5 metres spacing and 3.5 metres at the corners between holiday caravans, which is less than that for touring caravans, with less of a fire loading.

As no definitive guidance is given in the DCLG risk assessment guidance, it is necessary to look elsewhere. There is guidance for music and similar events (HSG 195) known as the "purple guide." As frequently camping is part of these events, then the purple guide gives guidance on this, including density;

Site densities

- 665 Experience has shown that a density of up to 430 tents per hectare for rock/ pop events is a realistic standard. At more family-orientated events, i.e. larger tents with greater number of occupants, this density would need to be reduced, possibly by around 50%.
- 666 It is desirable to provide separation distances between individual tents to make the site safer from fire and trip hazards, etc. Provide people entering the site with information and maps showing the camping areas and ensure there are sufficient stewards to direct people to the appropriate areas as the campsite fills up.

At present no UK guidance is available specifically for separation distances for motor caravan sites. There is guidance available through **The Confederation of Fire Protection Associations in Europe** (CFPAE). They have issued guidance for fire safety in camping sites. This states that it reflects best practice developed by countries of CFPA Europe and the UK is a member of this organisation.

Within the introduction to this guidance (CFPE No 20:2012 Fire Safety In Camping Sites) it states that;

“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.”

As there are no national requirements and the UK has signed up to this document, it is an appropriate standard to be applied. A copy of this guide is attached as Appendix 2.

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".

This requirement for 3 metres would also be in keeping with the 3 metres referred to within the 1983 Model Standards and the BRE research of ignition within 3 metres.

The CFPA Guide then goes on to give additional guidance such as block spacing. This is specific to camping sites and is not applicable for the proposed used covered in this report.

There is also the American standards for fire safety known as the NFPA standards. The applicable standard is NFPA 1194 Standard for Recreational vehicle Parks and Campgrounds. (In America motor caravans are known as RVs and the area an RV parks is known as a stand). This NFPA standard states that “a stand or structure shall be located at least 10ft (3.0m) away from any other stand or structure.”

Recommendation

That the CFPA Guide No 20:2012 Fire Safety In Camping Sites is the standard to be applied for deciding motor caravan spacing. That the free distance between units should be at least 3 metres and where possible 4 metres

Actual Parking Bay Size

Given the guidance mentioned above, of the need for a minimum free space of 3 metres between units, the next area to consider is that actual size of the parking area.

Whilst motor caravans come in many sizes, they are mainly based on a similar base chassis. The base widths for the present base chassis taken from manufacturers details are as follows:

Base Chassis	Width
Citron Nemo	2.01 m
Citron Relay	2.05 m
Fiat Ducato	2.35 m
Ford Kombi	2.08 m
Ford Transit Custom	2.08 m
Ford Transit Connect	1.83 m
Ford Turneo	2.08 m
Mercedes V Class	1.92 m
Mercedes Vito	2.24 m
Nissan NV200	2.0 m
Peugeot Boxer	2.26 m
Renault Master	2.07 m
Renault Traffic	1.96 m
Volkswagen T2	1.81 m
Volkswagen T6	2.10 m

Typically manufacturers will then build the body of the motor caravan on the chosen chassis. This may then lead to a slight increase in width. For example the Swift bolero 744 is on a Fiat Ducato chassis and has a maximum width of 2.38 m where as the Burstner Brevio 641 also on a Fiat Ducato chassis is only 2.10 m wide.

For all the 2017 Models the maximum width is 2.5 m

This would mean that a 2.5m wide parking space would allow a vehicle to park and the occupants to exit the vehicle. With an additional 3 m (1.5 m either side) would mean that no motor caravan is less than 3 m apart. So the total width of the parking bay would be 5.5 m.

If the parking bay is made any wider without some form of solid divider between the two, then the extra space between vehicles could allow additional motor caravans to inadvertently park in this area when the area becomes full.

Those using the bays should be encouraged to park in the centre of the bay; this can be enforced through the use of appropriate signage.

If a solid barrier is used between pitches then the space between them could be wider.

There are a number of ways that parking bays can be delineated. A number of examples seen throughout Europe are shown below.



Gravel area with concrete markers, each bay is 5.1 m wide



Tarmac bays – Kent 3.4 m wide



Tarmac bay – France 5 m wide



Grass divider, bays 3m wide, 4.5 m grass area



Logs dividing bays.



Marker studs in gravel bays

Recommendation

A parking bay width of 5.5 metres where no solid barrier is used between bays. Where a solid barrier is used, then this barrier should allow a separation distance of at least 3 metres.

Fire Warning

There is a requirement under the Fire Safety Order to consider means for giving warning in case of fire. As this is not a building then the normal type of fire warning systems would not be appropriate. The parking area can be seen in a similar way to the common area of a purpose built block of flats. Fire detection and alarm systems are not normally provided in the common parts of blocks of flats. This has been the benchmark standard for many years.

All new motor caravans, and most other motor caravans have a smoke alarm fitted. Whether this continues to work or not is a matter for the owner of the vehicle, similar to an individual home.

With no person employed on site, there is no responsible person to be informed and to take charge of actions, as there would be on a warden type campsite.

Similarly most car parks (exceptions being underground or part of a complex) do not have automatic fire warning systems, or manual fire alarm systems due to the risk of vandalism. Likewise for these types of sites any manual type fire alarm system would be likely to be subject to misuse and damage rendering it in-effective.

Recommendation

An automatic or manual fire alarm system is not required.

Firefighting Equipment

Under the Fire Safety Order, there is a requirement to consider the means of fighting a fire in order to safeguard the safety of relevant persons. Firefighting equipment is normally provided to be used by trained staff to deal with a fire during its early stage. Such equipment should only be used by those trained in its use. It is not considered appropriate or practicable for users of the site to receive such training.

The HM Government fire safety risk assessment guidance confirms this, on page 23 it states 'People with no training should not be expected to attempt to extinguish a fire....'

Again this is a common practice in purpose built blocks of flats and similarly to a fire warning system, any such device provided in a public area would likely be subject to vandalism and misuse making them ineffective in an emergency.

The fire service advice to those not trained in using firefighting equipment is to get out, stay out and call the fire and rescue service out.

As no employee will be present on these types of sites, there is therefore no one to be trained to use any form of firefighting equipment and therefore none should be provided.

Recommendation

Firefighting equipment is not installed on sites.

Emergency Lighting

Emergency lighting is used to enable occupants of a building or area to find their way to a place of total safety. The relevant DCLG fire safety risk assessment guide states “the primary purpose of emergency escape lighting is to illuminate escape routes...”

As this is not a building there is no requirement for emergency lighting to be installed in the area. Once a person is outside their motorhome they are in a place of total safety.

Recommendation

Emergency lighting is not required in the area.

Fire Safety Notices

Fire Safety notices can take two forms. Firstly exit signs to show persons the way out of a building in an emergency. As a large open site, then there is no requirement for any form of exit signage.

The second form of notice is information on what to do in an emergency.

An emergency action notice is required for the site. This should give the following information, along with some examples;

What to do in the event of a fire

On discovering a fire;

- a) *ensure the motor caravan or vehicle is evacuated*
- b) *alert occupants of nearby vehicles*
- c) *call the fire brigade dial 999 or 112 (the nearest telephone is sited at include simple diagram showing location)*
- d) *The address of the site*

[note 112 is the European emergency number and when dialled in the UK will have the same effect as dialling 999]

Motor Caravan Spacing Requirements

In order to comply with the fire regulations, please park in the centre of the bay and ensure that there is a minimum spacing of 3 metres between vehicles.

Fire Safety Information

To avoid the risk of fire, bonfires and barbeques are not permitted in this area

Given that it is likely that users of the sites may also be from Europe, consideration should be given to providing the information detailed above in other languages. Most common signs seen around Europe have information in English, French, German and Italian and this would seem an appropriate selection.

These signs should be at strategic points around the site.

Recommendation

Signage is provided on what to do in the event of a fire and other safety information at strategic points around the site. Consideration is also given to providing this information in languages other than English that reflects the likely users of the motor caravan parking area.

A handwritten signature in blue ink that reads "AGBrown".

Adrian Brown **MBA FIFireE**

Fire Decisions Limited

Documents Referenced

Approved Document B: Fire safety' (Volume 2), Department for Communities and Local Government (DCLG)

British Standards PAS 79: 2007, 'Fire risk assessment – Guidance and a recommended methodology, BSI, 2012

BS 5576:1998 Specification for fire safety features of camping tents, awnings, trailer tents and caravan awnings.

Building Research Establishment BD2552 Fire spread in car parks

Building Research Establishment Information Paper IP 15/91 Fire spread between caravans

Caravan Sites and Control of Development Act 1960

Clayden, P., The law of mobile homes and caravans 3rd Ed. 2003 Shaw & Sons

CFPE-E N° 20:2012 F Fire safety in camping sites

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Drysdale, D., An introduction to fire dynamics 2nd Ed. 2002 Wiley

Health and Safety Executive HSG 195 The event safety guide (Second edition) A guide to health, safety and welfare at music and similar events⁵

HM Government Guide 'Fire safety risk assessment: sleeping accommodation', Department for Communities and Local Government (DCLG)

Local Government Association – Fire Safety In Purpose-Built Blocks of Flats

Model Standards 2008 for Caravan Sites in England: Caravan Sites and Control of Development Act 1960 – Section 5

Model Standards 1989 : Holiday Caravan Sites, Caravan Sites and Control of Development Act, 1960 Section 5

Model Standards for Touring Caravan Sites 1983

NFPA 1194 Standard for Recreational Vehicle parks and Campgrounds

The Regulatory Reform (Fire Safety) Order 2005

Fire spread between caravans

M P Shipp, BSc, CPhys, MInstP

This paper describes work carried out to examine the spacing distance required to prevent the spread of fire between park homes (mobile homes) and holiday caravans. Ignitability tests were conducted on samples of caravan material and two complete caravans were fire tested. Factors taken into consideration were the construction materials, combustible items kept near the caravans and fire screens. The paper will be of interest to the caravan industry, site owners and local authorities.

INTRODUCTION

Park homes are mobile homes that are permanently occupied, whereas holiday caravans may be occupied only for the holiday season. Both are controlled on sites by the Caravan Sites and Control of Development Act 1960¹ and the Caravan Sites Act 1968². The former calls upon Model Standards issued by the Secretary of State which required that every caravan should be not less than 6 m from any other caravan in a separate occupation.

In recent years there have been requests from the caravan industry and site owners for this separation requirement to be reviewed, their case being that the structure and contents of caravans have changed significantly since 1977 when the standard was last revised. With the Department of the Environment undertaking a further revision of the Model Standards and the British Standards Institution planning a standard for the spacing of caravans, the Fire Research Station was asked to re-examine the spacing requirements in the light of changes in caravan design. Only park homes (mobile homes) and holiday caravans were studied, touring caravans being excluded. Details of the research results are given in *Fire Spread Between Park Homes and Caravans*³ and the findings have been incorporated into revised Model Standards^{4,5}.

A desk study was carried out to seek and examine background and statistical information, review current caravan design and consider other aspects of the spacing problem, including the use of fire barriers and the effects of radiation on escaping occupants. In addition the FRS fire investigation team visited a site where a park home had been badly damaged by fire, to examine the radiation damage to adjoining properties.

TESTS

The National Caravan Council (NCC) arranged for materials and caravans to be supplied for testing. A number of samples

of wall materials, curtains, etc were tested for ignitability using the ISO ignitability⁶ apparatus at FRS. The ignition of vertically orientated samples of the same materials was also investigated. In addition existing ignitability data were sought.

Two complete caravans — one a holiday caravan, the other a park home — were instrumented and fire tested. Both were representative of the models currently manufactured. Results

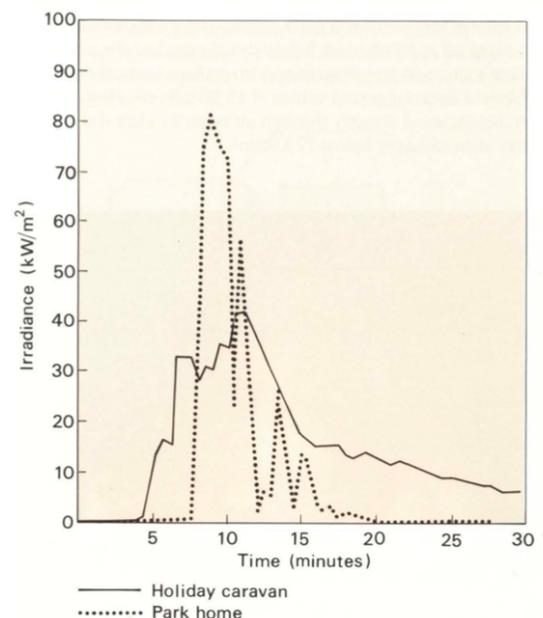


Figure 1 Heat radiation (irradiance) recorded 3m from each unit

from the fire tests provided both input and validation data for a computer model which calculated the radiation field from a burning caravan.

RESULTS AND DISCUSSION

Full-scale tests

A holiday caravan and a park home were instrumented by Warrington Fire Research Centre and burnt at FRS's Cardington Laboratory. The heat radiation (irradiance in kW/m^2) was measured at a number of locations around each unit. These tests were believed to be representative of the range of caravan model designs, ignition conditions, age of caravans, ambient conditions, etc, so that the results could be used to propose a 'design fire' for each type of unit. The tests were carried out in still air.

The two units were seen to burn in different ways (Figure 1). The roof of the holiday caravan gave way very quickly so that the fire burnt upwards with the air being drawn in through doors and windows, and later the walls (Figure 2). Because of the more robust construction of the park home its roof remained intact for some time and flames jetted from the doors and windows, resulting in a more severe fire than that in the holiday caravan (Figure 3).

The results of the ignitability tests on component materials had suggested that the aluminium of the holiday caravan could withstand thermal radiation for longer than the plywood of the park home. This difference in the standard of construction was evident in the burning behaviour of the two types, though the heating in the full-scale tests was by direct flame impingement, not just radiation.

Ignitability tests on materials

The wall structure of an aluminium skinned holiday caravan (ie outer skin, insulation and wood-based inner skin) did not ignite at irradiances below 50 kW/m^2 , although the paint burnt briefly without sustained ignition. The external fixtures and fittings (eg window frames, vents, etc) probably would have ignited at irradiances below this figure, but the actual critical value was not determined from these tests, though published data suggested values of $15\text{-}20 \text{ kW/m}^2$. However, curtains exposed directly through an open window did not ignite at irradiances below 17 kW/m^2 .

The plywood skin of a park home (with or without finish) did not ignite at irradiances below 17 kW/m^2 .

Other materials such as the tyres of cars, wood-based products and gas cylinders — all of which are likely to be found close to caravans on a site — were found unlikely to ignite at irradiances below 15 kW/m^2 , and more generally 20 kW/m^2 , although wood may have done so at 12.6 kW/m^2 .

Computer prediction of irradiance

A computer model was developed to enable the irradiance from a burning caravan to be calculated where it is incident on an adjoining unit at varying distances and orientations. The results from the full-scale tests were used to validate a design fire model for each of the two types of caravan. This was used to interpolate or extrapolate irradiances under selected conditions, such as the presence of a fire screen, for example. The model was used to show the distance from a burning caravan at which some defined irradiance would be experienced.

Some specific limitations of the model were:

- fire conditions 10 minutes after ignition when irradiances were at a maximum,
- results of a single fire (for each case) in a single model under specific conditions of ventilation and ignition,
- windless conditions,
- included some assumptions and were not exact, and
- only plane rectangular flames could be modelled.

Separation distances

The design fire

The ignitability criteria proposed, based on results of laboratory tests and available literature, and presuming the presence of a pilot flame (eg burning brand), were:

holiday caravan structure	50 kW/m^2
holiday caravan and park home generally	17 kW/m^2
other surrounding or intermediate items (eg cars, sheds, gas cylinders — including hazard to humans)	12.6 kW/m^2



Figure 2 Holiday caravan after six minutes



Figure 3 Park home after six minutes

The results of these test fires were modelled to produce irradiance fields around the two types of caravan 10 minutes after ignition, and were used to create design fire contours for the holiday caravan (Figure 4) and the park home (Figure 5). Manufacturers' variations in materials were presumed not to affect the design fires.

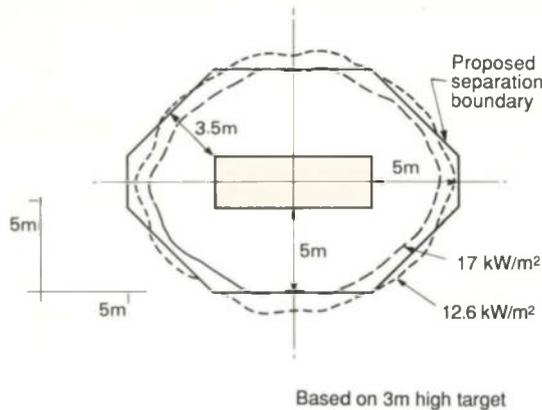


Figure 4 Holiday caravan design fire contours

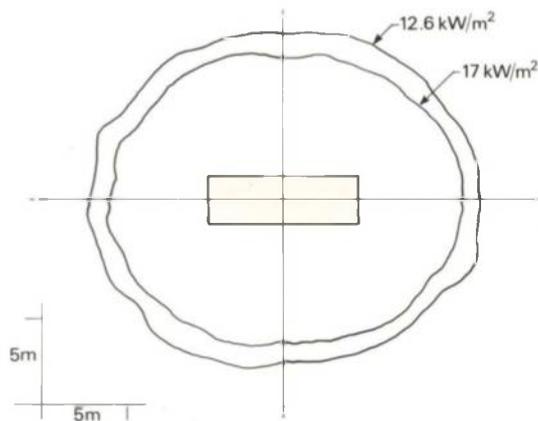


Figure 5 Park home design fire contours

Holiday caravan

The Model Standards⁷ spacing requirement of 6 m might be reduced to 5 m for holiday caravans with aluminium exteriors. The spacing contours at the corners could be cut off so that where the units are positioned 'corner to corner' a clear space of 3.5 m should be sufficient to ensure no fire spread (Figures 4 and 6). This presumes no major difference in the proportions of a holiday home caravan from the one that was tested. However, the 6 m spacing requirement should be retained for holiday caravans with a plywood exterior.

Park home

Figure 5 shows there was no flexibility to reduce the current 6 m spacing requirement for park homes. A simplified separation boundary was therefore inappropriate. There is, however, no evidence from reports of real fires to indicate any risk where the spacing is 6 m, so there was no reason to increase this distance.

Other intermediate items

There appeared to be no statistical or anecdotal evidence to suggest that the presence of sheds, cars, porches, etc between

park homes (or indeed between 6 m spaced holiday caravans) was creating a hazard to life. There was therefore little strong argument to support the use of these separation boundaries for intermediate items where holiday caravans or park homes are spaced 6 m apart.

On the basis of the fire test results it has to be presumed that any items (other than those classified as non-combustible⁸) within 3 m of a burning caravan could ignite and be an additional source of fuel and radiation, or indeed, direct flame impingement. However, certain items need to be located between units for practical reasons. The limitations that might be applied are summarised in Table 1.

RECOMMENDATIONS

- 1 There should be no change to the Model Standards³ 6 m spacing requirement for current designs of park homes.
- 2 The spacing requirement for holiday caravans with aluminium or other metallic exterior skin could be reduced to 5 m clear space, with 3.5 m space at the corners (Figures 4 and 6).
- 3 The spacing requirements for holiday caravans with an exterior skin of plywood or similar material should remain at 6 m.
- 4 Where there is a mixture of either park homes and holiday caravans, or holiday caravans made of aluminium (or other metal with similar ignitability characteristics) and plywood (or other material with similar ignitability characteristics), the separation distance should remain at 6 m.
- 5 Combustible intermediate items such as cars, gas bottles, etc associated with a separate holiday caravan occupancy with the 5 m spacing and within the separation boundary of an adjoining occupancy should be restricted (Table 1).
- 6 No combustible intermediate item should be within 3 m of an adjoining unit (ie there should be 3 m clear space between separate occupancies) except as specified in Table 1.

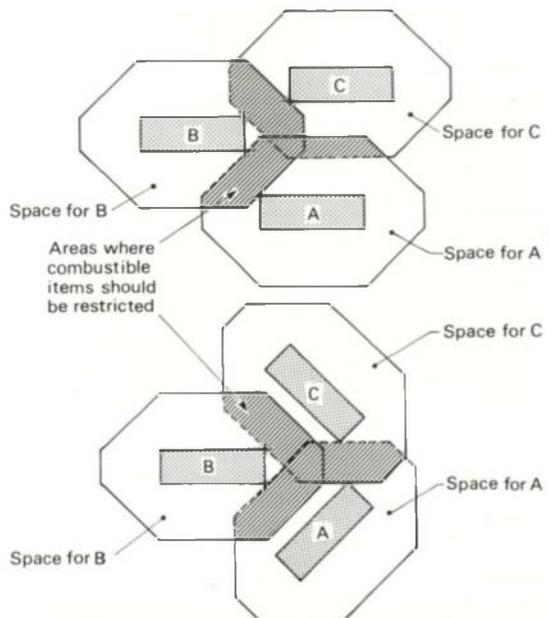


Figure 6 Holiday caravan layouts

Table 1 Restrictions on the placement of items within the separation boundary of an adjoining occupancy

Notes: 1 The table applies to both park homes and holiday caravans, except where stated otherwise.
 2 Except for covered walkways* there need be no restriction on the size or location for items outside the separation boundaries of any adjoining occupancies.

Item	Non-combustible (NC) or combustible (C)		Recommended restrictions
	NC	C	
Garages	NC	C	Windows should not point towards an adjoining home or caravan Do not permit
Car parking	—	—	1. At ground level only 2. On a non-combustible surface 3. Near to associated unit 4. Only one vehicle per space
Ramps and steps	NC	C	No restriction Only one such item per space, not more than 2m out from unit
Verandas	NC	C	No restriction Only one per space, not more than 1.5m out from unit
Porches and bay windows	NC	C	1. Not more than 2m wide (along unit) 2. Not more than 1m out from unit 3. Should not face similar item on adjoining unit
Eaves (park homes)	—	—	Clear space between eaves of adjoining units to be 5.5m
Eaves (holiday caravans)	—	—	Clear space between eaves of adjoining units to be 4.7m
Car ports	NC	C	Do not permit (will deflect flames) Thin thermoplastic sheet only
Covered walkways*	NC	C	Do not permit
Awnings	NC	C	Do not permit (will deflect flames) 1. Conventional materials of low mass only 2. Not more than 3m out from unit 3. Only one per space
Fences	NC	C	No restriction Low (1m high max.) picket fences only
Gas bottles	—	—	Contained within fire resisting, ventilated and non-combustible housing only
Grass	—	—	To be kept trimmed
Vegetation	—	—	Avoid 'bridge' between units

7 3 m high fire screens may be used to reduce the spacing for holiday caravans to 3.5 m clear space. They would need to be imperforate, non-combustible and robust.

8 Consideration should be given to producing holiday caravans with an imperforate wall and roof. Such units, with blank walls facing, could be separated by only 3 m clear space.

NB Care must be taken that implementation of 7 and 8 would not compromise existing means of escape provisions.

REFERENCES

1 Caravan Sites and Control of Development Act 1960. London, HMSO, 1960.

2 Caravan Sites Act 1968, Chapter 52. London, HMSO, 1968.

3 Shipp M P. Fire Spread Between Park Homes and Caravans — Recommendations on the spacing prescribed in the Model Standards to prevent fire spread. London, HMSO, 1989.

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6 International Organization for Standardization. Fire tests — Reaction to fire — ignitability of building products. *International Standard ISO 5657*, Geneva, ISO, 1986.

7 Department of the Environment and the Welsh Office. Caravan Sites and Control of Development Act 1960. Model Standards (Revised 1977). London, HMSO, 1977.

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Fire safety in camping sites

CFPA-E Guideline No 20:2012 F





FOREWORD

The European fire protection associations have decided to produce common guidelines in order to achieve similar interpretation in the European countries and to give examples of acceptable solutions, concepts and models. The Confederation of Fire Protection Associations in Europe (CFPA E) has the aim to facilitate and support fire protection activities across Europe.

The market imposes new demands for quality and safety. Today fire protection forms an integral part of a modern strategy for survival and competitiveness.

The guideline is primarily intended for the public. It is also aimed at the rescue services, consultants, safety companies and the like so that, in the course of their work, they may be able to help increase fire safety in society.

The draft of this guideline was produced by The Norwegian Fire Protection Association and the author was Øyvind Engdahl from Norway. This version has been revised by Kjell Schmidt Pedersen from Norway.

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.

Copenhagen, 22 March 2012
CFPA Europe

Jesper Ditlev
Chairman

Stockholm, 22 March 2012
Guidelines Commission

Tommy Arvidsson
Chairman





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1 Introduction

Fires and explosions in caravans are feared incidents.

So far the European communities have not experienced devastating fires in camping sites as such, but the risk exists that a large fire might occur. The risk includes danger of fatalities and injuries. There was, however, a large fire with many fatalities in the camping site of Los Alfaques in Spain in 1978 with 210 fatalities. This was due to a truck carrying a liquefied propane tank, which ruptured due to overfilling and exploded beside the camping site. This must be considered as a transport incident with highly inflammable substance.

Fires in camping tents and caravans do occur regularly, but if they were to occur at night-time in an overcrowded camping-site, fatalities and injuries and heavy material damage might be the result.

This guideline is based on a review of the existing different European rules for camping sites. The Finnish rules and guidelines (ref.1) are extensively used as basis. This guideline does not apply to areas used for the permanent siting of mobile homes.

2 Scope

The aim of this guideline is to prevent injuries, loss of life and loss of property in fires in on camping sites. It recommends fire precaution measures to be taken by the owner of the sites, and measures the guests may take to protect themselves from fires and explosions when they are visiting a camping site.

These precautions rules will also be useful to prevent fires in caravans when they are on the road.

Note: This guideline is not applicable to temporary assembly tents like circus tents, and areas temporary used for concerts and festivals.

3 Definitions

Caravan	A mobile wagon which may be towed by a vehicle and used for dwelling purposes especially on vacations
Camper	A self propelled vehicle used for overnight and dwelling purposes.
Camping site	A ground prepared for caravans, cars and tents. The site may be guarded and also contain reception, washing-rooms with toilets, kiosks and sometimes leisure equipment.
Camping unit	Caravan or camper including possible tent or similar
Service building	A building intended for the operation of the site with reception, kiosk, shop, restaurant, wash-rooms or similar
Tent area	Part of the camping site where tents are pitched
Caravan area	Part of the camping site where caravans and campers are placed
Distance between tents	Distance between tents measured between the nearest tent wires
Safety area	Area in the camping site fixed to secure sufficient distance to prevent fire spread and secure access for rescue units



4 Risks involved and prevention measures to be taken

4.1 General

In the recent years camping sites have developed from simple grounds with no or few facilities to modern sites with high standards. Most sites have receptions, kiosks where you can buy a selection of the most common articles, toilets- and washing facilities, electric power and leisure equipment.

In recent years the camping sites have grown larger and might hold a large number of guests, tents, caravans and cars. All these together may create a risk of tragic fires with potential loss of lives and property. The probability of a fire to occurring is higher than in normal dwellings. This is due to the fact that:

- Cooking is performed by use of propane burners in narrow spaces in combustible tents or caravans.
- Tents, cars and caravans are made of combustible materials, often easily ignitable and the units are often placed with minimum distance to the neighbours.

4.2 Fire precaution guidelines for the camping guests

Injuries in connection with fires on camping sites are mostly caused by a fire in ones own camping unit. It is therefore first and foremost the individual camping guest who can influence the risk of a fire.

The risk will be reduced if the following precautions are taken into account:

- There should be no use of open fires or glowing charcoal inside tents or near tent canvas. A tent will very quickly turn into flash-over. A knife ready accessible inside the tent can easily be used to create a way out.
- Cooking appliances and field kitchens should not be fuelled unless the burner is put out and cold. If not, the bottle might catch fire and cause heavy injuries.
- Grills, cooking appliances and similar must not be placed nearer than 1 meter to tent canvas.
- All flexible tubes and couplings to the gas burner should be checked for leakage and that it is in good order.
- All inhabitants should be aware of the location of the fire fighting equipments location and how a fire could be detected, and how the alarm should be raised.
- The area between the tents should be kept clean and orderly and not be subject to storage of any objects.

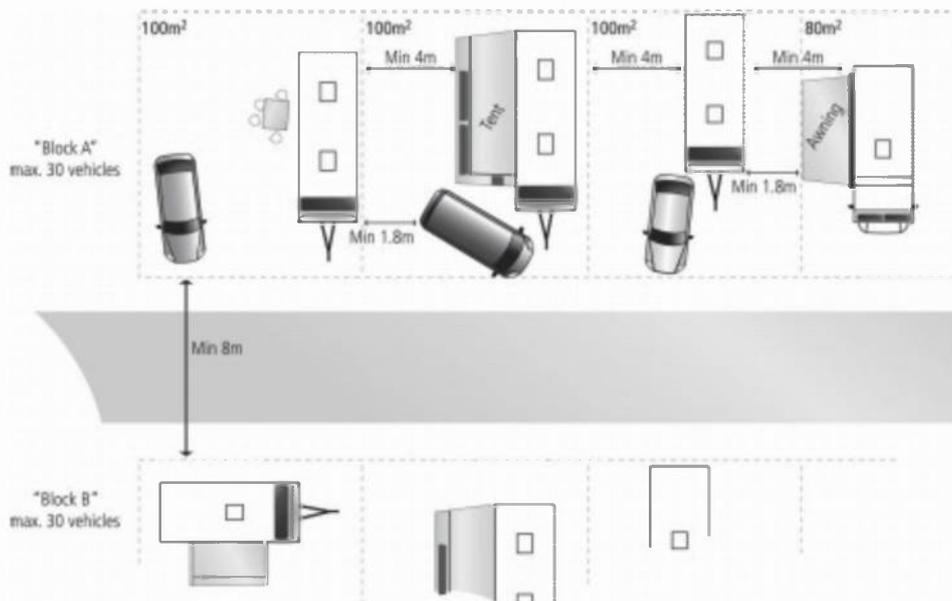
4.3 Fire precaution rules for the owner of the camping site

The following requirements are recommended to be applied by the owners of camping sites:

- The ground has to be arranged in such a manner that the free distance between each camping unit is a minimum of 3 meter; preferably 4 meter.
- Portable fire extinguishers and/or fire hoses have to be placed around the site. The traveller distance to a fire extinguisher should not exceed 25 m.



- Posters with fire precaution rules for the specific site and how to raise the alarm in case of a fire, have to be set up.
- For every 1000 m² it is recommended to make an open area of at least 6 meter width to the next section.
- The owner of the camping site should consult the local building authority regarding camping units with more or less permanent annex constructed of combustible materials.
- The owner is responsible for the security and should work out a rescue plan for the camping site.
- Personnel shall preferably restrict the access to the camping site.
- The camping site should be divided into blocks with 30 places for vehicles, maximum 60 tents, giving each car with trailer a space of minimum 100 m² and each caravan a space of minimum 80 m². The distance between the blocks should be minimum 8 meter.
- Each block in the site should be divided into 3 units, each with space for 10 vehicles and with a minimum distance of 5 meter between each unit.
- Minimum distance between a caravan and a neighbouring vehicle or awning should be 1.8 meter.



The figure shows the recommended distances between the blocks of a camping site and the recommended minimum distances between the different camping vehicles/units (from Ref.1).



4.4 Access for the fire brigade or rescue units and the required water supply

If a fire or accident should occur, it is important that the fire brigade have a good access to every part of the camping site. The fire brigade should be consulted to get the necessary information about the width, height and axle load of their fire engines and the minimum swing radius they can manage. On the site there must be sufficient parking space for the fire brigade vehicles. The access routes must be free of obstacles and parked cars.

It is important to decide the maximum distance to the water supply (hydrants or cisterns). The water supply must give the necessary quantity of water at adequate pressure.

4.5 Caravans and campers

Caravans and campers which are used for staying overnight should be equipped with a smoke alarm and an extinguisher containing at least 2 kg of dry powder. The vehicles heating and cooking appliances should be regularly inspected by a qualified person.

5 References

1. Fire safety requirements for camping areas in Finland. SF-Caravan.
2. Campingplasser og gjestebåthavner (camping sites and guest harbours) issued by Direktoratet for samfunnssikkerhet og beredskap, Norway.
3. Brannsikker fritid: Camping (Fire safe leisure: Camping) issued 2004 by Norsk brannvernforening, Norway
4. Tekniske forskrifter for forsamlingsstelte, selskapshuse, salgsområder og campingområder, der ikke er omfattet av campingreglementet, issued 18th October 2005 by Beredskapstyrelsen, Denmark

6 European guidelines

Guideline No	1:2002 F	-	Internal fire protection control
Guideline No	2:2007 F	-	Panic & emergency exit devices
Guideline No	3:2011 F	-	Certification of thermographers
Guideline No	4:2010 F	-	Introduction to qualitative fire risk assessment
Guideline No	5:2003 F	-	Guidance signs, emergency lighting and general lighting
Guideline No	6:2011 F	-	Fire safety in care homes for the elderly
Guideline No	7:2011 F	-	Safety distance between waste containers and buildings
Guideline No	8:2004 F	-	Preventing arson – information to young people
Guideline No	9:2012 F	-	Fire safety in restaurants
Guideline No	10:2008 F	-	Smoke alarms in the home
Guideline No	11:2005 F	-	Recommended numbers of fire protection trained staff
Guideline No	12:2012 F	-	Fire safety basics for hot work operatives
Guideline No	13:2006 F	-	Fire protection documentation