

APPENDIX 3

Consultation Response	Response
Consultation feedback on draft caravan site policy I have reviewed the relevant sections of the draft policy against the Model Standards 2008 for Caravan Sites in England. My comments are set out below by section. Section 3.4 – Emergency vehicle access The draft policy states: “Emergency vehicles shall be able to secure access at all times to within 90 metres of any unit on the site.” There does not appear to be any reference to a 90 metre distance in the Model Standards 2008 for Caravan Sites in England. The Model Standards 2008 for Caravan Sites in England states in Section 2(ii): “No caravan shall be stationed within 2 metres of any road or communal car park within the site or more than 50 metres from such a road within the site.” The draft policy provides dimensions for the road, which is the access route for emergency vehicles. On that basis, the maximum distance from the fire appliance access road to any unit on the site should be 50 metres, not 90 metres. This is also consistent with operational firefighting considerations, as the fire service hose reel is 60 metres, which is why the 50 metre figure is used. I therefore recommend that Section 3.4 is amended so that emergency vehicles can secure access to within 50 metres of any unit on the site. Section 4.1 – Fire points The draft policy states: “Fire points shall be established so that no caravan or site building is more than 90 metres from a fire point. They shall be housed in a weather-proof structure, easily accessible and clearly and conspicuously marked “FIRE POINT”.” This should be amended to 30 metres, not 90 metres. The Model Standards 2008 for Caravan Sites in England states in Section 18(ii): “These shall be located so that no caravan or site building is more than 30 metres from a fire point. Equipment provided at a fire point shall be housed in a weather-proof structure, easily accessible and clearly and conspicuously marked “FIRE POINT”.” I therefore recommend that Section 4.1 is amended so that no caravan or site building is more than 30 metres from a fire point. Section 4.4 – Firefighting equipment at fire points	The Fire points raised are those for Holiday Caravan Sites, and these are compared in the response to the model conditions for Permanent residential sites. The model conditions for permanent residential sites were also contained in Appendix 1, after the Holiday Caravan site model conditions. To make this clearer the model conditions have been split into 2 separate appendices and given headings.

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The draft policy states:

“Where standpipes are not provided or the water pressure or flow is not sufficient, each fire point shall be provided with either water extinguishers (2 x 9 Litre) or a water tank of at least 500 litres capacity fitted with a hinged cover, 2 buckets and 1 hand pump or bucket pump.”

However, the Model Standards 2008 states the following in Section 99:

“A water tank with buckets and a pump should not be the main means of fighting fire for the following reasons: • Pumps and buckets are likely to be vandalised or stolen. • Pumps and buckets are inadequate for fighting a fire. • A water storage tank should be securely covered to prevent it becoming a health or safety hazard.”

The draft policy should not allow either 2 x 9 litre water extinguishers or a water tank with buckets and a pump as alternative options, because the Model Standards make clear that a water tank with buckets and a pump should not be the main means of firefighting.

I therefore recommend that the wording is amended by either:

changing “or” to “and”, so that a water tank and buckets are not treated as an alternative to extinguishers; or

removing the allowance for a water tank, buckets and pump as a standalone firefighting provision.

This would ensure the draft policy is consistent with the Model Standards 2008 and does not present a water tank and buckets as the main means of firefighting.