

## **Report to the Cabinet**

**Report reference:**

**C-002-2015/16**

**Date of meeting:**

**11 June 2015**



**Epping Forest  
District Council**

**Portfolio:** Housing

**Subject:** Site Licence Conditions on Holiday Caravan and Camping Sites

**Responsible Officer:** Sally Devine (01992 564149).

**Democratic Services:** Gary Woodhall (01992 564470).

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### **Recommendations/Decisions Required:**

**(1) That following consultation with site operators, statutory consultees and other interested parties, the Standard Licence Conditions for Holiday Caravan and Camping Sites in Epping Forest District attached at Appendix 1 be adopted.**

### **Executive Summary:**

The Council is responsible, through its site licensing regime, for ensuring that health, safety and fire safety provisions are satisfactory on the holiday caravan and camping sites within the District. The existing site licence conditions for holiday sites have not been reviewed for many years and are outdated.

Following consultation with site operators, statutory consultees and other interested parties, new conditions have been produced which the Cabinet is now being asked to adopt as the Epping Forest District Council Standard Site Licence Conditions for Holiday Camping and Caravan Sites.

### **Reasons for Proposed Decision:**

The Council is required to issue licences on all park homes sites in the District with conditions that are relevant, consistent and will adequately protect the health and safety of people residing at, or visiting the sites. New proposed standard park home site licence conditions for permanent residential sites occupied by the settled community were agreed by the Cabinet in July 2012 (C-012-2012/13), and new site licence conditions for the Gypsy, Roma and Traveller sites were agreed in September 2014 (C-015-2014/15). The existing site licence conditions for Holiday Sites in the District have not been reviewed for many years. In the light of this the Cabinet agreed that consultation should be undertaken with the site operators and other interested parties, to agree suitable licence conditions for these sites. This consultation has now been carried out and the resulting comments have been taken into account in the proposed site licence conditions that are attached at Appendix 1.

### **Other Options for Action:**

The option of not producing new licence conditions has been discounted as the existing conditions are outdated and such an approach could compromise the health and safety of those visiting the sites.

The option not to consult has been discounted as the legislation that allows a local authority to alter site licence conditions, requires that the licence holder be given an opportunity to make representation before any changes are imposed. The legislation also requires that the Fire Service is consulted before any changes are made.

### **Report:**

1. In July 2012 and September 2014 respectively, following consultation with site owners, residents and other interested parties, the Cabinet agreed the conditions to be attached to the site licences for the permanent residential park homes sites (C-012-2012/13) and the Gypsy, Roma and Traveller sites in the District (C-015-2014/15). The Cabinet was also advised that new standard licence conditions for the District's holiday sites would follow. This is considered necessary because the Council is responsible, through its site licensing regime, for ensuring that health, safety and fire safety provisions are satisfactory and the existing site licence conditions for holiday sites have not been reviewed for many years and are outdated.

2. There are currently 5 Holiday Sites in the District. One site operates for touring use only where visitors provide their own caravan/ motorhome or tent for the duration of their stay. Three sites operate as static holiday sites where visitors stay in holiday units that are permanently stationed on the site and one site operates as both a static and touring holiday site.

3. The Caravan Sites and Control of Development Act 1960 allows a local authority to alter site licence conditions at any time but in exercising such powers it must have regard to any Government standards. Two sets of standards exist for holiday sites, the 1989 Model Standards for Holiday Caravan Sites and the 1983 Standards for Touring Sites, and these standards have provided the framework for the proposed standard licence conditions for holiday sites in the Epping Forest District. However, these Model Standards are themselves somewhat dated and so the proposed new standards also take account of modern practices such as the use of 'pods' on sites as a modern alternative to tents and caravans. Pods are permanently sited timber built structures of different specifications which may contain a sleeping area and cooking facilities but have no bathing or toilet amenity provided.

4. Proposed site licence conditions were drafted and presented to the Portfolio Holder for Housing who agreed that consultation should be undertaken with the site operators of the holiday sites already existing in the District. The consultation period lasted 6 weeks and ended on 10 April 2015.

5. Officers in the Private Sector Housing Team have also consulted with and considered the views of other officers within the Council (Forward Planning and Enforcement Team, Environment and Neighbourhood Team, Engineering, Drainage and Water Teams), together with other external parties including the Essex County Fire and Rescue Service and the Essex County Traveller Unit, the Ambulance Service, the Health and Safety Executive and the Environment Agency. Their comments have been taken into account as detailed in Appendix 2 and the proposed new site licence conditions for Holiday Caravan and Camping sites are set out in Appendix 1.

6. Members are advised that the Mobile Homes Act 2013 introduces the ability of a council to charge for its licensing and enforcement functions on relevant protected sites. However, whilst permanent residential sites are included within the definition of 'relevant protected site', holiday sites are not, and as such the Council are not able to consider charging site operators of holiday sites in the way it has done for permanent residential sites and Gypsy Roma and Traveller sites on the District.

7. Members are asked to agree these conditions as the Epping Forest District Council Standard Site Licence Conditions for Holiday Camping and Caravan Sites. If adopted it is proposed that all site operators will be notified of the Cabinet decision and new site licences with the new conditions

will be issued within the following 2 months.

**Resource Implications:**

Within existing resources

**Legal and Governance Implications:**

Caravan Sites and Control of Development Act 1960  
Model Standards 1989 for Holiday Caravan Sites in England  
Model Standards 1983 for Touring Caravan Sites in England

**Safer, Cleaner and Greener Implications:**

Adopting new standard conditions for Holiday Caravan and Camping Sites will ensure measures are in place to protect the health and safety of holiday makers on these sites.

**Consultation Undertaken:**

In drafting the proposed site licence conditions, Private Sector Housing Team officers have consulted and considered the views of other officers within the Council (Forward Planning and Enforcement Team, Environment and Neighbourhood Team Engineering, Drainage and Water Teams), together with representatives of Essex County Fire and Rescue Service.

The formal consultation included the site operators of the 5 existing Holiday Sites on the District; relevant internal services within the Council; and other external parties including the Essex County Fire and Rescue Service, the Ambulance Service, the Health and Safety Executive and the Environment Agency. Three responses were received from the consultation. The table attached as Appendix 2 to the report sets out the responses from each organisation and the comments and suggested changes.

The Lee Valley Regional Park Authority (LVRPA) raised a number of comments and concerns and these are highlighted in Appendix 2. Representatives of the LVRPA met with officers of the Private Sector Housing Team to discuss the issues and some amendments to the draft conditions were made (principally around period of occupation of the site and allowing different amenity provision for tourers and static caravans). In addition the Private Sector Housing Team considered some additional amendments were necessary (principally around allowing some further differences between static and touring sites, and also to include particular consideration for disabled people in the provision and siting of amenities) and these are also included in Appendix 2. The amended draft conditions were re-circulated to all the site operators and other interested parties for further consultation and no adverse comments were received.

**Background Papers:**

None.

**Risk Management:**

Failure to set and ensure compliance with appropriate licence conditions would compromise the health and safety of holiday makers staying on these sites by limiting the control measures that may be imposed.

# Due Regard Record

This page shows **which groups of people are affected** by the subject of this report. It sets out **how they are affected** and how any **unlawful discrimination** they experience can be eliminated. It also includes information about how **access to the service(s)** subject to this report can be improved for the different groups of people; and how they can be assisted to **understand each other better** as a result of the subject of this report.

S149 Equality Act 2010 requires that due regard must be paid to this information when considering the subject of this report.

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The proposed site licence conditions are produced in order to protect the health safety and welfare of all holiday makers visiting holiday caravan and camping sites in the District.

The site licence conditions principally cover the physical aspects of the site and the provision and siting of amenities within it. It was identified that disabled people with mobility restrictions may not be able to benefit from the use of these sites if certain amenities such as washing and toilet facilities are not made accessible to them. The proposed licence conditions therefore require that there is particular consideration for disabled people in the provision and siting of amenities to make them accessible where at all practical.

The requirement to comply with site licence conditions and any costs incurred rests with the site operators who are not a protected group in terms of equalities legislation. The licence conditions are not considered prohibitive and will not detrimentally affect the sustainability of their business (which might otherwise indirectly affect a sector of the community that may have protected characteristics).

## **Appendix 1**

### **EPPING FOREST DISTRICT COUNCIL**

#### **STANDARD LICENCE CONDITIONS FOR HOLIDAY CARAVAN AND CAMPING SITES IN EPPING FOREST DISTRICT**

The Annex attached to these Standard Site Licence Conditions contains conditions specifically relating to the Regulatory Reform (Fire Safety) Order 2005. Fire safety standards will be enforced by the Fire Authority on all holiday caravan sites where informal action by the Local Authority has not resolved any issues of concern.

#### **Schedule of Conditions**

##### **General**

- (i) ( ) site is licensed for a maximum of ( ) holiday caravans.
- (ii) This licence shall only apply to that area of land in respect of which planning permission has been obtained to station holiday caravans or tents for holiday use.
- (iii) For the purpose of these licence conditions reference to 'caravan' can be equally applied to any tent, pod or any other structure designed or adapted for human habitation which is capable of being moved from one place to another (whether being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted.
- (iv) For the purpose of these licence conditions a 'static' caravan means a caravan that is stationed on the site all year including the period of time that the site is closed and prohibited from use as a caravan site by virtue of the planning conditions pertaining to that site. A 'touring' caravan means a caravan that is moved on and off the site for occupation whilst the site is open and it is not stationed on the site during the period when the site is prohibited from use as a caravan site by virtue of the planning conditions pertaining to that site.

#### **1. PERIOD OF OCCUPATION OF SITE**

- (a) A touring caravan must not be occupied by the same person or persons for more than 28 days within 36 consecutive days.
- (b) All caravans may only be occupied during the periods stipulated by planning consent relevant to the site.
- (c) The site licence holder must make available the records of occupancy to the Local Authority upon request.

#### **2. SITE BOUNDARIES**

- (a) The boundaries of the site from any adjoining land must be clearly marked by a man-made or natural feature.
- (b) No caravan or combustible structure shall be positioned within 3 metres of the boundary of the site.

- (c) A plan of the site must be supplied to the local authority upon the application for a licence and, thereafter whenever there is a material change to the boundaries or layout of the site, or at any other time on the demand of the local authority.
- (d) The plan supplied must clearly illustrate the layout of the site including all relevant structures, features and facilities on it and must be of suitable quality.

### **3. ROADS, GATEWAYS AND FOOTPATHS**

- (a) Roads and footpaths must be constructed of suitable materials and adequately maintained to the satisfaction of the Local Authority.
- (b) All roads must have adequate surface water/storm drainage and must comply with Section 10(f) below.
- (c) Roads and footpaths must be designed to provide adequate access for fire appliances (detailed advice and guidance on turning circles is available from the Fire Authority).
- (d) Roads must be provided so that no caravan standing is more than 50 metres from a road.
- (e) Where the approach to the caravan is across ground that may become difficult or dangerous to negotiate in wet weather, each caravan standing must be connected to a carriageway by a footpath with a hard, well drained surface which must be maintained in good condition.
- (f) Roads must not be less than 3.7 metres wide, or if they form part of a clearly marked one way traffic system they must not be less than 3 metres wide.
- (g) One-way systems must be clearly signposted.
- (h) Where existing two way roads are not 3.7 metres wide, passing places must be provided where practical.
- (i) Gateways must be a minimum of 3.1 metres wide and have a minimum height clearance of 3.7 metres.
- (j) Footpaths and pavements must not be less than 0.90 metres wide.
- (k) Roads must have no overhead cables less than 4.5 metres above the ground.
- (l) Emergency vehicle routes within the site must be kept clear of obstruction at all times.

### **4. LIGHTING**

Roads, communal footpaths and pavements must be suitably lit taking into account the needs and characteristics of the particular site.

## **5. HARD-STANDINGS**

- (a) Where possible, every caravan must stand on a hard-standing of suitable material which must extend over the whole area occupied by the caravan placed upon it. Hard-standings must project a sufficient distance outwards from the entrance or entrances of the caravan to enable occupants to enter and leave safely.
- (b) Hard standings may be dispensed with if the caravans are removed during the winter or if they are situated on ground which is firm, well drained and safe in poor weather conditions.

## **6. TELEPHONES**

Where a telephone is available on site for visitors to call the emergency services, it must be maintained in working order and a notice must be provided adjacent to the telephone with details of the site address.

## **7. STORAGE OF LIQUIFIED PETROLEUM GAS (LPG)**

- (a) All Gas Installations and Equipment must comply with the Gas Safety (Installation and Use) Regulations 1988 and applicable parts of the following (or successor guidance):
- (b) **LPG supplied from bulk tanks**  
LP Gas Association Code of Practice 1: Part 1; Design, Installation and Operation of Vessels Located Above Ground, and, Part 4; Buried/Mounded LPG Storage Vessels.
- (c) **LPG supplied from cylinders**  
LP Gas Association Code of Practice 7: 1999 Storage of Full and Empty LPG Cylinders and Cartridges.
- (d) **Installations in caravans**  
British Standard 5482: Code of Practice for Domestic, Butane and Propane Gas Burning Installations: Part 2: 1977: Installations in Caravans and Non-permanent Dwellings.
- (e) A copy of all current safety check certificates required by gas safety legislation in respect of appliances provided for the use of the caravan occupiers must be kept available for inspection by authorised officers of the Local Authority.
- (f) Unless otherwise approved by the Local Authority, every gas appliance provided for the use of the caravan occupiers, must be fitted with an effective flame failure device.
- (g) Gas bottles and cylinders must not be positioned or secured to caravans in such a way as to impede access or removal in the event of an emergency.
- (h) Exposed gas bottles and cylinders must not be stored or left within the separation boundary of any caravan.
- (i) Exposed gas bottles and cylinders must be stored in a suitable cage or container which must be kept locked at all times. LPG storage

cages/containers must not be kept in the separation space.

## **8. ELECTRICAL INSTALLATIONS**

- (a) Sites must be provided with an electricity supply that is sufficient in all respects to meet all reasonable demands of the caravans situated on them.
- (b) Electrical installations (other than Electricity Board works and circuits subject to regulations made by the Secretary of State under Section 16 of the Energy Act 1983 and Section 64 of the Electricity Act 1947) must be installed, tested and maintained in accordance with the provisions of the Institute of Electrical Engineers (IEE) Regulations for Electrical Installations for the time being in force, and where applicable, to the standard which would be acceptable for the purposes of the Electricity (Overhead Lines) Regulations 1988, Statutory Instrument 1988, No 1057.
- (c) Work on electrical installations and appliances must only be carried out by a competent person such as the manufacturer's appointed agent, the electricity supplier, a professionally qualified electrical engineer, a member of the Electrical Contractor's Association, a contractor approved by the National Inspection Council for Electrical Installation Contracting (NICEIC), or a qualified person acting on behalf of one of the above.
- (d) The electrical installations must be inspected periodically: under the IEE Wiring Regulations, every year or such longer period as is considered appropriate in each case (not exceeding 3 years). When an installation is inspected it shall be judged against the current regulations.
- (e) If an inspection reveals that an installation no longer complies with the regulations in existence at the time it was first installed, any deficiencies must be rectified. Any major alterations and extensions to the installation affected by them should comply with the latest version of the IEE Wiring Regulations.
- (f) The inspector must within one month of carrying out the inspection, issue an inspection certificate in the form prescribed in the IEE Wiring Regulations. The certificate must be retained by the site licence holder and must be displayed, supplemented or replaced by subsequent certificates, with the site licence. The cost of the inspection and the report shall be met by the site licence holder.
- (g) The site licence holder must provide the Local Authority with a copy of the electrical certificate upon request.
- (h) If there are overhead cables on the site, suitable warning notices must be displayed at the entrance to the site and on the support for each of the lines. Where appropriate, particular attention shall be drawn to the danger of masts of yachts or dinghies contacting the lines.
- (i) All static caravans and pods must be connected to, electrical hook-up-points (HUP) with minimum Ingress Protection Rating of IP44. An adequate number of HUP suitably positioned to be available for all touring caravans and camper vans. The electrical hook-up points must be fitted with a lockable window flap over protection device and also fitted with a Residual Current Circuit Breaker with Overload Protection (RCBO).



## **9. WATER SUPPLY**

- (a) Sites must be provided with an adequate, constant and wholesome water supply in accordance with all current legislation, regulations and British or European Standards piped to the inside of the caravan. The water supply must be maintained at an adequate flow rate and pressure even when the system is placed under maximum demand.
- (b) The water supply and distribution system must be maintained in accordance with all current relevant legislation, regulations and British or European Standards, including codes of good practice. Records of maintenance should be kept and supplied to the Local Authority upon request.
- (c) A Water Safety Plan, including plan of the distribution system, should be prepared for the supply and supplied to the Local Authority on request. Risks to the supply should be addressed in accordance with the Water Safety Plan.
- (d) All new fittings and any materials or substances attached or used in connection with the supply or distribution system must comply with appropriate legislation, regulations and British or European Standards and/or be approved by the Water Undertaker and/or Drinking Water Inspectorate.
- (e) All repairs and improvements to water supplies and installations must be carried out so as to conform to current legislation and British or European Standards.
- (f) Work on water supplies and installations must be carried out only by persons who are qualified in the particular type of work being undertaken and in accordance with current relevant legislation and British or European Standards, including codes of good practice.
- (g) Where the water supply is not provided by a recognised water undertaker, the Local Authority must be informed as to the nature of the supply.
- (h) Where there is no piped supply to static caravans or pods and where the site is available for touring caravans, camper-vans and tents, no caravan, camper-van or camping pitch must be more than 90 metres from a drinking water tap supplied with a constant and wholesome water supply in accordance with all current legislation, regulations and British or European Standards. The water supply from drinking taps must be maintained at an adequate flow rate and pressure even when the system is placed under maximum demand.
- (i) Each drinking water tap must be provided with a suitable gulley or soakaway.

## **10. DRAINAGE, SANITATION AND WASHING FACILITIES**

- (a) There must be satisfactory provision for foul and waste water drainage either by connection to a public foul water sewer or sewage treatment works or by discharge to a properly constructed and installed septic tank or cesspool, approved by the Local Authority and with a permit from the Environment Agency where appropriate. The foul water treatment or containment facility must be of sufficient capacity for the number of persons living/visiting the site and for the type of effluent that it is intended to receive. Where effluent is removed from the site the licensee/owner/occupier must provide the Local

Authority if requested, with a copy of the Discharge Consent as issued by the Environment Agency and/or Waste Transfer Notes. The treatment plant or containment facility must be adequately maintained by a suitably qualified or competent person.

- (b) All drainage and sanitation provision must be in accordance with all current legislation and British and European Standards, including Approved Document H of the Building Regulations (or as updated or amended). For new sites, approval from the Council's Building Control, or an approved inspector, will be required for the foul and waste water system/s prior to installation and occupation of the site. Septic tanks and cesspools must be emptied as often as necessary to prevent the contents overflowing and at no time must the foul and waste water system/s pollute any land or watercourse, or pose a risk to public health or cause a nuisance.
- (c) Where there is no piped system serving static caravans or pods and where the site is available for touring caravans, camper-vans and tents, properly designed disposal points for the contents of chemical closets must be provided with an adequate supply of water for cleansing the containers. The water supply shall be clearly labelled as unsuitable for drinking.
- (d) Where there is no piped system serving static caravans or pods and where the site is available for touring caravans, camper-vans and tents, waste water disposal points shall be provided so that each pitch is no further than 90 metres from a waste water disposal point.
- (e) For static caravans including pods without their own water supply, shower facilities and WCs, communal facilities must be provided and suitably located, with adequate supplies of water on at least the following scales:
- Male: 1 WC and 1 urinal per 15 caravans/pitches;
  - Female: 2 WCs per 15 caravans/pitches;
  - Wash basins with hot and cold water: 1 per WC or group of WCs; and,
  - Shower or Bath with hot and cold water: 1 for each sex per 20 caravans/pitches.
- (f) Where touring caravans, camper-vans or tents are permitted on the site the following communal facilities must be provided and suitably located, with adequate supplies of water on at least the following scales:
- Male: 1 WC and 1 urinal per 30 caravans/pitches. Female: 2 WCs per 30 caravans/pitches. This condition may be relaxed on approval by the local authority where the site has less than 10 pitches or more than 120 pitches;
  - Wash basins with hot and cold water: 4 per 30 caravans/pitches: 2 each for men and women positioned adjacent to the WCs; and,
  - Shower or bath with hot and cold water: 1 for each sex per 25 caravans/pitches. This condition may be relaxed on approval by the Local Authority where the number of pitches is less than 70.
- (g) Toilet blocks must be sited conveniently so that all site occupants have reasonable access by means of a road or footpath.

- (h) Particular consideration must be given to the needs of disabled people in provision made for water points, toilets, washing points and showers such that they are made accessible where at all practical.
- (i) There must be satisfactory provision for surface water drainage from all static caravans and pods, either by connection to a public surface water sewer, use of Sustainable Drainage Systems (SuDS), discharge to a pond/lake or a watercourse providing the relevant permissions are in place and water quality and/or environmental quality are not adversely impacted. A soakaway will not be suitable unless the results of a percolation test, carried out in accordance with Approved Document H of the Building Regulations (or as updated or amended), indicate that the ground has sufficient permeability and the infiltration must be clean surface water only into uncontaminated ground. The surface water drainage system must be approved by the Local Authority.
- (j) All systems must be properly functioning and maintained and any system proposed must not increase flood risk to the site and/or to neighbouring land and properties.
- (k) Prior written consent from the Environment Agency, for a main river, and Local Authority (Land Drainage), for ordinary water courses, is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of a watercourse.

#### **11. REFUSE DISPOSAL**

- (a) Every static caravan standing including pods must have an adequate number of suitable non-combustible refuse bins with close-fitting lids. Arrangements must be made for the bins to be emptied regularly to prevent the contents from overflowing.
- (b) Satisfactory arrangements must be made for the disposal of refuse from touring caravans, camper-vans and tents. Where communal refuse bins are provided these must be of suitable non-combustible material and housed within properly constructed bin stores which must be kept clean and tidy.

#### **12. RECREATION SPACE**

- (a) Where children stay on the site, suitable space equivalent to about one-tenth of the total area must be allocated for children's games and/or other recreational purposes. This provision will normally be necessary because of the limited space available around the caravans.
- (b) Recreation space may be omitted where there are suitable alternative publicly provided recreational facilities which are readily accessible.

#### **13. NOTICES**

- (a) A suitable sign must be prominently displayed at the site entrance indicating the name of the site.
- (b) A copy of the site licence with its conditions must be displayed prominently on the site.

- (c) Notices and a plan of the site must be displayed on the site setting out the action to be taken in the event of an emergency. They shall show the location of:
- Police;
  - Fire Brigade;
  - Ambulance;
  - Local Doctors' Surgery;
  - Nearest Public Telephone; and,
  - Name, location and telephone number of the licence holder or his/her accredited representative.
- (d) At sites subject to flood risk, warning notices must be displayed giving advice about the operation of the flood warning system.
- (e) All notices must be suitably protected from the weather and displayed where possible out of the direct rays of the sun and preferably in areas lit by artificial lighting.

#### **14. CARBON MONOXIDE POISONING**

- (a) All camping and caravan units provided on site by the site owner must be fitted where practical with an audible CO gas detector.
- (b) There must be suitable information (site notices or information leaflets) readily accessible to all site visitors that warns about and gives advice on how to reduce risk of carbon monoxide poisoning while camping and caravanning. The use of fuel – burning appliances, including barbeques in a tent or awning must be prohibited.

#### **15. FLOODING**

- (a) The site owner and/or the potential occupiers must refer to the Environment Agency's flood map. If the site falls within a Flood Zone 2 or 3 and the occupation of the site so determines, a Flood Risk Assessment must be carried out, before occupation of the site, in order to demonstrate that the proposed development will be safe for the duration of its lifetime. The Flood Risk Assessments must be approved by both the Environment Agency and the Local Authority.
- (b) No occupation of mobile homes intended for holiday or short-let caravans use is allowed if the site falls within a Flood Zone 3b. Flood Zone 3a may be appropriate for occupation subject to the passing of a sequential test and exception test as approved by the Local Authority.
- (c) Subject to (b) above, if the site falls within a Flood Zone 2 or 3, in addition to a Flood Risk Assessment being submitted the owner and/or occupier must sign up to the Environment Agency's Floodline Warnings Direct system. The owner and/or occupier must also submit to the Local Authority a specific warning and an Evacuation Plan including reference to safe access and egress routes and take any other reasonable measures, as approved by the Local Authority, to ensure the safety of the occupants of the site. All residents must be made aware of any evacuation plan and procedures. A copy of the approved Evacuation Plan must be lodged with the Council's Emergency Planning Officer.

- (d) Any approval given by the Local Authority will always take into consideration any potential flood risk and safety issues to neighbouring properties and land, in addition to the site itself and the occupants of the site.

## **EPPING FOREST DISTRICT COUNCIL: ANNEX TO THE STANDARD LICENCE CONDITIONS FOR HOLIDAY CARAVAN AND CAMPING SITES IN EPPING FOREST DISTRICT COUNCIL**

This Annex to the Site Licence Conditions contains conditions specifically relating to the Regulatory Reform (Fire Safety) Order 2005. Fire safety standards will be enforced by the Fire Authority on all holiday caravan sites where informal action by the Local Authority has not resolved any issues of concern. Any proposal other than to meet the requirements set out below will be subject to a Fire Risk Assessment by a competent person and will require formal approval by the Essex County Fire and Rescue Authority.

### **1. SPACING BETWEEN CARAVANS**

- (a) Subject to the following variations, the minimum spacing distance between caravans made of aluminium or other materials with similar fire performance properties must be not less than 5 metres between units and 3.5 metres at the corners. [See specimen layout attached (extracted from Circular 14/89: Caravan Sites and Control of Development Act 1960- Model Standards Appendix 1)].
- (b) For caravans and pods with a plywood/timber or similar skin and for canvas tents or where there is a mixture of holiday caravans of aluminium and plywood or tents, the separation distance must be 6 metres. The point of measurement for porches and awnings is the exterior cladding of the caravan.
- (c) Porches may protrude 1 metre into the 5 metres (or 6 metres) and must be of the open type.
- (d) Where awnings are used, the distance between any part of the awning and an adjoining caravan must not be less than 3 metres. They must not be of the type which incorporates sleeping accommodation and they must not face each other or touch.
- (e) Eaves, drainpipes and bay windows may extend into the 5 metre (or 6 metre) space provided the total distance between the extremities of two adjacent units is not less than 4.5 metres.
- (f) Where there are ramps for the disabled, verandas and stairs extending from the unit, there must be 3.5 metres clear space between them and the next unit (4.5 metres where there is a mixture of caravans) and such items must not face each other in any separation space. If they are enclosed they shall be considered as part of the unit and, as such, must not intrude onto the 5 metre (or 6 metre) separation space.
- (g) A garage, shed or other covered storage space shall be permitted between units only if it is of non-combustible construction (including a non-combustible roof) and sufficient space is maintained around each unit so as not to obstruct or prejudice the means of escape in the event of a fire. Windows in such structures must not face towards the units on either side. Covered walkways must in no circumstances be allowed within the 5 or 6 metres separation space. For conditions relating to cars and boats between units, see the standard on **Parking**.

## 2. PARKING

- (a) One car only may be parked between adjoining caravans provided that the door to the caravan is not obstructed. Suitably surfaced parking spaces must be provided where necessary to meet the additional requirements of the occupants of the site and their visitors.
- (b) No additional combustible material or other objects including plastic or wooden boats, jet skis or trailers may be parked or positioned between adjoining caravans.

## 3. FIRE FIGHTING APPLIANCES

### FIRE POINTS

These must be established so that no caravan or site building is more than 30 metres from a fire point. They must be housed in a weather-proof structure which is easily accessible and clearly and conspicuously marked "FIRE POINT".

- (a) Where water standpipes are provided and there is a water supply of sufficient pressure and flow to project a jet of water approximately 5 metres from the nozzle, such water standpipes must be situated at each fire point.
- (b) There must also be a reel that complies with British Standard 5306 Part 1, with a hose not less than 30 metres long, having a means of connection to a water standpipe (preferably a screw thread connection) with a water supply of sufficient pressure and terminating in a small hand control nozzle.
- (c) Hoses must be housed in a box painted red and marked "HOSE REEL".
- (d) Where standpipes are not provided but there is a water supply of sufficient pressure and flow, fire hydrants must be installed within 100 metres of every caravan standing. Hydrants must conform to British Standard 750.
- (e) Access to hydrants and other water supplies must not be obstructed or obscured.
- (f) Where standpipes are not provided or the water pressure or flow is not sufficient, each fire point must 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 a bucket pump.
- (g) The following alternatives to the requirements above may be acceptable subject to the agreement of the Fire Officer:

### FIRE FIGHTING EQUIPMENT

- (a) One 2.0 kilogramme Dry Powder fire extinguisher to **BS EN 3-7:2004 + A1:2007** OR one x 9 litre water extinguisher must be provided for every three caravans. These appliances must be externally sited in enclosed housings with "break glass" fronts and in such positions on site as are approved by the Fire Authority.

- (b) Any additional or alternative fire fighting equipment must be provided in addition to those required in paragraphs above if so required by the Fire Authority.

**FIRE WARNING**

- (a) A suitable means of raising the alarm in the event of a fire must be provided at each fire point. This could be by means of a manually operated sounder, e.g. metal triangle with a striker, gong or hand operated siren.
- (b) Where fire extinguishers are provided in purpose built/factory standard boxes with battery operated alarm facilities, this shall be the means of raising the alarm.
- (c) The advice of the Fire authority must be sought on an appropriate alarm system.

**MAINTENANCE OF FIRE FIGHTING EQUIPMENT**

- (a) All alarm and fire fighting equipment must be installed, tested annually and maintained in working order by a competent person in accordance with BS 5306-3:2009 and be available for inspection by, or on behalf of, the Local Authority.
- (b) A log book must be kept to record all tests and any remedial action undertaken.
- (c) All equipment susceptible to damage by frost must be suitably protected.

**FIRE NOTICES**

A clearly written and conspicuous notice must be provided and maintained at each fire point to indicate the action to be taken in case of fire and the location of the nearest telephone. This notice must include the following information:

- “On discovering a fire*
  - i. Ensure the caravan or site building involved is evacuated*
  - ii. Raise the alarm*
  - iii. Call the Fire Brigade (the nearest telephone is sited.....)*
  - iv. Attack the fire using fire fighting equipment provided, if safe to do so*

*It is in the interest of all occupiers of this site to be familiar with the above routine and the method of operating the fire alarm and fire fighting equipment”.*

**FIRE HAZARDS**

- (a) Long grass and vegetation must be cut back at frequent and regular intervals where necessary to prevent it becoming a fire hazard to caravans, buildings or other installations on the site. This includes the area immediately adjacent to and beneath the caravans.



- (b) Where boundaries are defined by hedges these must be cut back and maintained as necessary to ensure a 3 metre wide area is kept clear on the inside at all times.
- (c) The space beneath and between caravans must not be used for the storage of combustible materials.

#### **ADDITIONAL FIRE PRECAUTIONS**

- (a) All camping and caravan units provided on site by the site owner must be fitted, where practical with a smoke detector with a 10 year life lithium battery.
- (b) All recreational buildings used by occupiers of the site must be subject to a Fire Risk Assessment to identify the fire hazards and to identify and put in place the physical fire precautions and management arrangements necessary to ensure the safety of people using the facilities. For further information see the CLG Guide – Small & Medium Places of Assembly (or as updated).
- (c) There must be suitable information (site notices or information leaflets) readily accessible to all site visitors that warns about and gives advice on how to reduce risk of fire incidents while camping and caravanning.

#### **REQUIREMENT TO COMPLY WITH THE REGULATORY REFORM (FIRE SAFETY) ORDER 2005**

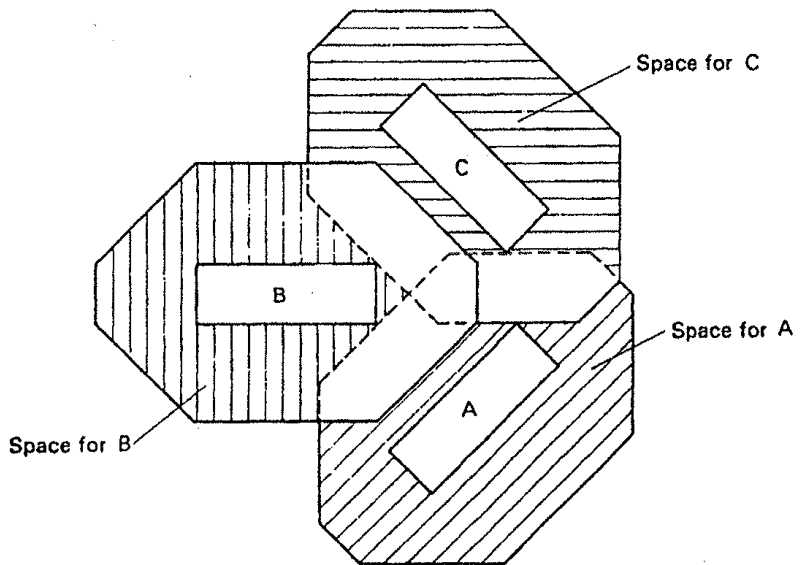
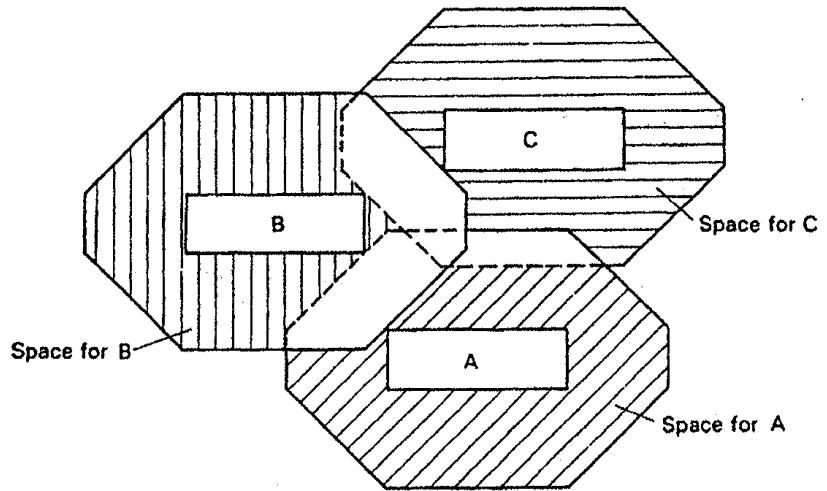
The site licence holder must make available the latest version of the fire risk assessment carried out under the Regulatory Reform (Fire Safety) Order 2005 for inspection by residents and when demanded, a copy of the risk assessment shall be made available to the Local Authority.

CIRCULAR NO. 14/89: CARAVAN SITES AND CONTROL OF DEVELOPMENT  
ACT 1960—MODEL STANDARDS

4-503

APPENDIX 1

HOLIDAY CARAVAN LAYOUTS



4-503

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[Release 104: 1 - i - 93.]

**Appendix 2: Consultation responses to the draft Site Licence Conditions for Holiday Caravan and Camping Sites in Epping Forest District and proposed changes**

Organisation	Consultation Response	Comments/ Suggested changes
<p>Lee Valley Regional Park Authority (LVRPA)</p>	<p>The LVRPA consider that the requirements of Para1: Period of Occupation of Site, can be complied with in respect of touring caravans but not for static caravans which are often owned by individual families who would not be prepared to be restricted to using their caravan for limited periods at a time. Planning permission allows an 11 month opening season and the planning condition in place that requires it be for holiday use only is monitored and controlled by various stipulations and checks. The LVRPA argue that the 28 day rule for static units would be impossible to effectively enforce because the rule relates to the individual and not the unit.</p> <p>The LVRPA consider that the proposed number of washing and toilet facilities per male/ female on site is unreasonable and currently its site would not comply. The Lee Valley site is a 4* holiday site and has never received feedback that there is an inadequate number of toilet facilities.</p>	<p>It is agreed that the Planning conditions imposed on holiday sites protect against the potential use of a site for permanent use and the existing measures in place are effective. The draft conditions are amended to:</p> <ol style="list-style-type: none"> <li>1. Define the meaning of a static caravan and a 'touring' caravan</li> <li>2. Require the period of occupation for <u>touring caravans</u> (but not static caravans) to be maximum 28 days in 36 consecutive days</li> <li>3. Require that <u>all</u> caravans may only occupy sites in accordance with planning conditions and that all records of occupancy to be made available to the LA on request.</li> </ol> <p>The Model standards require different levels of amenity provision for static and touring sites which officers had not appreciated at first draft. This affects the overall amenity requirement for the Lee Valley site which has both statics and tourers. In order to distinguish and clarify between the two the draft is amended to reflect the two separate standards for wc, wash basins, bathing facilities.</p>

	<p>The LVRPA consider that the spacing requirement of 6m between units is unreasonable and it had obtained planning approval based on a proposed spacing between pods of 5 metres. The cost of re-siting the pods would be financially prohibitive.</p>	<p>The Private Sector Housing Team consider that the units should be sited a minimum of 6m apart and further consultation with ECFRS advises that ideally a site should be designed in line with the Model Standards. However, a Fire Risk Assessment should be carried out by a competent person. If there are compensatory features within or between the units over and above that which is required by the Model Standards, it is possible that reduced spacing between units may be permitted.</p> <p>As a result of the ECFRS response the draft conditions are amended to include a sentence in the introductory paragraph of the Annex to the conditions that states: 'Any proposal other than to meet the requirements set out below will be subject to a Fire Risk Assessment by a competent person and will require formal approval by the Essex County Fire and Rescue Authority'.</p>
<p>Essex County Fire and Rescue Service (ECFRS)</p>	<p>ECFRS advised that the draft condition relating to the provision of smoke detectors in recreational buildings on sites should be amended because each building will be different and will be dependent on a Fire Risk Assessment to determine what is appropriate</p>	<p>The draft conditions are amended to reflect the requirements of ECFRS of a Fire Risk Assessment for all recreational buildings on site and refers on to a CLG Guide- 'Small and Medium Places of Assembly.'</p>
<p>Engineering, Drainage and Water Team</p>	<p>The draft conditions do not take account of current legislation, regulations and European Standards</p>	<p>The draft conditions are amended to reflect the current requirements regarding water quality supply standards as specified by the Council's</p>

		Engineering, Drainage and Water Team
Private Sector Housing Team	Having reviewed the draft conditions again following its meeting with the LVPRA further amendments were considered appropriate	<p>The draft is amended to include an additional condition to require waste disposal points within 90 metres of each pitch where no piped system exists on sites</p> <p>The draft is amended to include particular consideration for disabled people in the provision and siting of amenities to make accessible where at all practical.</p> <p>The draft is amended to distinguish between the different requirement for statics and tourers in respect of refuse disposal facilities.</p> <p>The draft conditions are amended by taking out condition 12 of first draft and inserting at condition 2 of the Annex to the conditions because the requirements regarding parking are relevant to fire safety and more appropriately enforced by the ECFRS than the Council</p>
Rushymead Clubhouse Ltd	The Rushymead Clubhouse Ltd made observations regarding its proposals for its site. The main concerns are in respect of drainage of waste water from individual units and re-positioning of existing units	Comments are duly noted

