

Carl Sargeant AC / AM
Y Gweinidog Tai ac Adfywio
Minister for Housing and Regeneration



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-04-521
Ein cyf/Our ref CS/00009/14

William Powell AM
AM for Mid & West Wales
Chair Petitions committee
Ty Hywel
Cardiff Bay
Cardiff
CF99 1NA
committeebusiness@Wales.gsi.gov.uk

January 2014

Dear William

Thank you for your letter of the 16 December on behalf of the Petitions Committee regarding the petition from Mr Brian Silvester which calls for the Welsh Government to investigate whether legislation relating to the safety of holiday and residential caravan parks in Wales is adequate and properly enforced. The concerns of the petitioner particularly relate to safety around:

1. The space between caravans
2. The storage of bottled gas
3. The siting of caravans and other combustible structures in the 3 metre clear area round the site boundary.

The Mobile Homes (Wales) Act 2013 provides Welsh Ministers with the power to specify model standards for the layout and provision of facilities, services and equipment for regulated sites. The model standards for residential mobile homes were updated in 2008 and in 1989 for holiday caravan parks. Both include guidelines for the spacing between caravans, the storage of bottled gas and the siting of caravans and combustible structures in the 3 metre area around the site boundary.

The 2008 Model Standards for residential mobile home parks issues the following guidelines with regard to the issues raised by the petitioner:

1. Section 2 – ‘Density, Spacing and Parking Between Caravans’ states in subsection (i) “[...] every caravan must be spaced at a distance of no less than 6 metres (the separation distance) from any other caravan which is occupied as a separate residence.”

2. Section 8 – ‘Supply & Storage of Gas etc’ states in subsection (i) “Gas (including natural gas) and oil installations and the storage of supplies must meet current statutory requirements, relevant standards and codes of practice.” In subsection (ii) it also states “Liquefied Petroleum Gas cylinders must not be positioned or secured in such a way as to impede access or removal in the event of an emergency.”
3. Section 1 – ‘The boundaries and plan of the site’ states in subsection (ii) “Caravans or combustible structures must not be positioned within 3 metres of the boundary of the site.”

These guidelines are to be taken into consideration when local authorities issue site licenses for mobile home sites.

In relation to the specific issues raised by the petitioner on fire safety, the Regulatory Reform (Fire Safety) Order 2005 (RRO) applies. The order:

- tell businesses what they need to do to comply with fire safety law
- help businesses carry out a fire risk assessment
- help businesses identify the general fire precautions they need to have in place

The RRO issues specific guidelines for fire safety on caravan sites relating to the spacing between caravans and the safe storage of bottled gas in the guidance ‘Fire Safety Risk Assessment: Sleeping Accommodation’.

It is an obligation under the RRO that all businesses carry out a fire risk assessment to ensure compliance with fire safety regulations, and make that assessment available to inspectors. Failure to comply with any duty imposed by the order, or any notice issued, is an offence. The Fire and Rescue Authority are the main enforcers of the RRO and have the powers to check that sites are compliant.

I am not aware of any evidence that the regulations governing fire safety on holiday or residential mobile home sites is either inadequate or not being enforced. It should though, be noted by the Petition Committee that the specific issue of fire safety does not fall under my portfolio and that the Minister for Local Government and Community, under whose area this falls, may have a better idea of any shortcomings in this area.



Carl Sargeant AC / AM
Y Gweinidog Tai ac Adfywio
Minister for Housing and Regeneration