Revising the Model Standards for Park Homes

Consultation paper on revised standards and guidance

December 2005
Revising the Model Standards for Park Homes

Consultation paper on revised standards and guidance
## CONTENTS

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chapter 1</td>
<td>Executive Summary</td>
<td>7</td>
</tr>
<tr>
<td>Chapter 2</td>
<td>Introduction</td>
<td>8</td>
</tr>
<tr>
<td>Chapter 3</td>
<td>Model Standards: Introduction and Legal Background Revision</td>
<td>12</td>
</tr>
<tr>
<td>Chapter 4</td>
<td>Model Standards: Site Boundaries Revision</td>
<td>16</td>
</tr>
<tr>
<td>Chapter 5</td>
<td>Model Standards: Density and Space between Caravans Revision</td>
<td>19</td>
</tr>
<tr>
<td>Chapter 6</td>
<td>Model Standards: Roads, Gateways and Footpaths revision</td>
<td>24</td>
</tr>
<tr>
<td>Chapter 7</td>
<td>Model Standards: Hard Standing Revision</td>
<td>27</td>
</tr>
<tr>
<td>Chapter 8</td>
<td>Model Standards: Introduction to Fire Fighting Appliances</td>
<td>29</td>
</tr>
<tr>
<td>Chapter 9</td>
<td>Model Standards: Fire Points Revision</td>
<td>31</td>
</tr>
<tr>
<td>Chapter 10</td>
<td>Model Standards: Fire-fighting equipment Revision</td>
<td>32</td>
</tr>
<tr>
<td>Chapter 11</td>
<td>Model Standards: Fire Warning Revision</td>
<td>34</td>
</tr>
<tr>
<td>Chapter 12</td>
<td>Model Standards: Maintenance Revision</td>
<td>35</td>
</tr>
</tbody>
</table>
Chapter 13
Model Standards: Fire Notices Revision

Chapter 14
Model Standards: Fire Hazards Revision

Chapter 15
Model Standards: Telephones Revision

Chapter 16
Model Standards: Storage of LPG Revision

Chapter 17
Model Standards: Electrical installations Revision

Chapter 18
Model Standards: Water Supply Revision

Chapter 19
Model Standards: Drainage Sanitation and Washing Facilities Revision

Chapter 20
Model Standards: Refuse Disposal Revision

Chapter 21
Model Standards: Parking Revision

Chapter 22
Model Standards: Recreation Revision

Chapter 23
Model Standards: Notices Revision

Chapter 24
Model Standards: Flooding (NEW)
Annexes

Annex A
List of Key Organisations to be consulted 62

Annex B
Code of Practice on Consultation 63

Annex C
Regulatory Impact Assessment 64

Annex D
Diagram for measurement of separation gap 70

This consultation paper covers England and Wales
Chapter 1

Executive Summary

This paper sets out the Government’s recommendations to revise and update the 1989 Model Standards for Permanent Residential Mobile Home Sites (The Model Standards).

The Model Standards are good practice Standards relating to such things as layout and provision of facilities, services and equipment for parks. They are taken into account by local authorities when considering what (if any) conditions should be attached to site licences.

In updating the Model Standards we have aimed to take account of the recommendations of the Park Homes Working Party, which stated ‘The Government should consider whether to amend the Model Standards to include additional items.’

Additionally the ‘Local Authority Licensing of Park Home Estates’ report felt that in the review the following would be relevant:

- Consultation with all relevant parties.
- Further basic research on the technical aspects of Model Standards.
- Redrafting should be such as to avoid the Model Standards dating simply because new regulations are issued.
- Greater specificity may be required if licence conditions are to be enforceable. This could be dealt with through the Model Standards or accompanying Guidance.
- Revised Model Standards might make clear which conditions are required as absolute minima and which might be legitimately adopted above this level.

The changes we are proposing are contained in each of the following chapters, with an explanation of why we are proposing the changes. The chapters also include the guidance notes, which would accompany the Standards.

---

1 Government response to the recommendations of the park homes working party DETR November 2001
2 Local Authority Licensing of park home estates report DETR October 2000
Chapter 2

Introduction to the Consultation

What are Park Homes?

1. Park homes are mobile homes used for permanent residential purposes. Parks vary in size and quality, from small parks, with a handful of park homes, to large parks with shopping and leisure facilities. Some park homes resemble bungalows; others are closer in appearance to traditional caravans.

2. Research\(^3\) carried out for the ODPM in 2002 estimated that around 120,000 people, predominantly elderly, live on more than 1,680 residential parks in England and Wales. These estimates are now thought to be conservative with more recent calculations suggesting that there may be as many as 250,000 residents and in excess of 2,000 parks. We are currently examining ways to gain a better knowledge base in this area.

3. Most residents own their park homes, which may cost anything from £10,000 up to in excess of £200,000. Typically residents enter into an agreement to keep their home on the park, and pay the owner of the park a pitch fee. Pitch fees average around £1,000 per annum. Park owners may also receive up to a 10% commission on the sale price of the home when the home is sold and agreement reassigned.

Site licensing of park homes

4. The development of parks and their physical standards are controlled through the planning system under the Town and Country Planning Act 1990 (the 1990 Act) and the site licensing system under the Caravan Sites and Control of Development Act 1960 (the 1960 Act). Under the 1990 Act all parks must have planning permission, granted by the local planning authority, for use of the land as a ‘caravan site’. Under the 1960 Act all parks (excluding those run by local authorities), must have a site licence, issued by the local authority. In granting a licence a Local Authority may attach conditions about the physical characteristics of the park. In attaching these conditions a Local Authority must consider Model Standards, which are issued from time to time by the Secretary of State.

What are Model Standards?

5. Model Standards are, as the 1989 revision states, the conditions, ‘normally expected as a matter of good practice on sites.’ They apply only to residential caravan parks and those which contain a mixture of holiday homes and permanent residential homes and can cover areas such as the layout of parks and the provision of facilities, services and equipment for them. The last set of Model Standards was issued in 1989 and introduced a number of changes from the previous 1977 Standards.

---

\(^3\) Economics of the Park Homes Industry, ODPM/National Assembly for Wales, 2002
Park Homes Working Party and the case for revising the Model Standards

6. In 1998, the then Department of Environment, Transport and Regions (DETR) set up the Park Homes Working Party (PHWP) to examine how the existing legislation on park homes could work more effectively and also to consider whether there was a need to change in the longer term.

7. Site licensing was one area reviewed by the PHWP. As part of this the University of Birmingham was commissioned to carry out research to provide information about the experiences of local authorities operating the site licensing system. This was done in the Local Authority Licensing of Park Home Estates report published in 2001. The report said that the Model Standards had dated since last being issued over 10 years ago and should be reviewed. This fed into the recommendations of the PHWP.

8. In July 2000, the PHWP published its Report for consultation, including recommendations for change. The Department issued its formal response to the PHWP Report in November 2001 and accepted 25 of the 30 recommendations. The Government response stated that, ‘there would be benefits in reviewing and updating the Model Standards, which as a minimum should recognise current best practice.’

9. Our aims in revising the Model Standards are that:

- They are clear and easy to understand.
- They do not become out dated simply because new regulations are issued.
- All Standards meet current technical Standards.
- They include, as far as possible, the matters that are of concern to all parties involved, including park home owners.

We have also included in conjunction with the Model Standards for the first time a guidance note. The guidance which will be a companion document to the Model Standards helps all stakeholders understand the issues around specific areas of the Model Standard and means the Standards will be less dated as technical guidance can be included in here.

Our approach to the revision of the Model Standards

10. In the following chapters the Model Standards have been broken down into manageable sections which each form a stand alone chapter.

In each chapter the structure is the same.

- There is a brief introduction under the heading background which sets out what the section discusses.
- Then the 1989 Model Standard is shown.

---

5 Government Response to the Recommendations of the Park Homes Working Party (DTLR 2001)
Then our **proposed 2005 Standard** is shown and an explanation of why we have proposed the alteration.

This is followed by **implementation** issues, which highlight costs from the changes for local authorities, park owners and residents.

Then we have also included our suggested wording for the new **guidance** that will accompany the new Model Standards. This is mainly to help Local Authorities implement the changes in an even way and offers advice on what they should be looking for when carrying out a park inspection.

Finally we highlight possible **enforcement** issues that the particular section may raise and where possible try to help the local authority to take all the relevant factors into account when they are considering enforcement action. This will form part of the guidance.

We would be grateful for your comments. In particular, comments on whether you consider that we have met our aims outlined in 9 above and if there are any relevant issues/changes which have not been considered in this paper.

In formulating your response, you may wish to consider the following questions:

**Question 1:** Are the proposed revisions an improvement on the existing Standards? If not, why not? And what would you like to see added?

**Question 2:** Do you find the Standards clear? If not, what would help to make them clearer?

**Question 3:** Is there anything within the Standards that you would change? What would that be and why would you change it?

**Question 4:** Is there anything missing from the Standards? If so, please explain what you think is missing and why it should be included.

**Question 5:** What would be helpful to be included in the guidance, which will be available to stakeholders?

**Question 6:** Do you have any further comments on the revised Model Standards?

**Question 7:** Do you agree with the analysis and assumptions made in the Regulatory Impact Assessment?
Responses

Please send your response, no later than 13 April 2006 to:

Mark Coram
Office of the Deputy Prime Minister
2/H10 Eland House
Bressenden Place
London
SW1E 5DU

E-mail responses are welcome. If you are replying by e-mail please include the words ‘Model Standards consultation response’ in the subject or title. These and any enquiries can be sent to:

mark.coram@odpm.gsi.gov.uk

Telephone number for enquiries is

0207 944 4400 xtn 19557

Representative groups are asked to include a summary of the people and organisations they represent in their reply.

A summary of responses to this consultation will be published by 6 July at the address below.

www.odpm.gov.uk

Paper copies will be available on request.

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances; this will mean that your personal data will not be disclosed to third parties.

This consultation paper covers England and Wales.
Chapter 3

Model Standards: Introduction and Legal Background Revision

Background

This section is the opening section of the Model Standards. This explains the power of the Secretary of State to prescribe Model Standards under the Caravan Sites and Control of Development Act 1960. It also defines the term Model Standards.

1989 Standard – Caravan Sites and Control of Development Act, 1960 Section 5
Model Standards 1989: Permanent Residential Mobile Home Sites

Introduction and Legal Background

Section 5(6) of the Act provides that the Secretary of State may from time to time specify Model Standards with respect to the lay-out and the provision of facilities, services and equipment for caravan sites or particular types of caravan site; and that, in deciding what (if any) conditions to attach to a site licence, the local authority shall have regard to any standards so specified.

Section 7(1) provides that on an appeal against any condition of a site licence a magistrates’ court, if satisfied, having regard amongst other things to any standards specified by the Secretary of State under section 5(6), that a condition is unduly burdensome, may vary or cancel the condition.

Section 24, which empowers local authorities to provide caravan sites, provides in subsection (2) that in exercising their powers under the section the local authority shall have regard to any standards that may have been specified by the Secretary of State under section 5(6) of the Act.

In pursuance of his powers under section 5(6) of the Act, the Secretary of State hereby specifies the following standards in relation to caravan sites on which some or all of the caravans are used as permanent residences by people other than gypsies or agricultural workers. They are Model Standards: they represent the standards normally to be expected as a matter of good practice on such sites. They are not intended to apply to any other type of caravan site – for example, sites which only have holiday caravans, or touring caravan sites. They should be applied with due regard to the particular circumstances of each case, including the physical character of the site, any services or facilities that may already be available within convenient reach, and other local conditions.
We propose to reword to:

**Caravan Sites and Control of Development Act, 1960 Section 5. Model Standards 2005: Park Home Parks**

**Introduction and Legal Background**

I Section 5(6) of the Act provides that the Secretary of State may from time to time specify Model Standards with respect to the lay-out and the provision of facilities, services and equipment for caravan parks or particular types of caravan park; and that, in deciding what (if any) conditions to attach to a site licence, the local authority shall have regard to any standards so specified.

Section 7(1) provides that on an appeal against any condition of a site licence a magistrates' court, if satisfied, having regard amongst other things to any standards specified by the Secretary of State under section 5(6), that a condition is unduly burdensome, may vary or cancel the condition.

Section 24, which empowers local authorities to provide caravan sites, provides in subsection (2) that in exercising their powers under the section the local authority shall have regard to any Standards that may have been specified by the Secretary of State under section 5(6) of the Act.

II In pursuance of his powers under section 5(6) of the Act, the Secretary of State hereby specifies the following Standards in relation to caravan sites on which some or all of the caravans are used as permanent residences by people other than gypsies or agricultural workers. They are Model Standards: they represent the Standards normally to be expected as a matter of good practice on such sites. They are not intended to apply to any other type of caravan site – for example, sites which only have holiday caravans, or touring caravan sites. They should be applied with due regard to the particular circumstances of each case, including the physical character of the site, any services or facilities that may already be available within convenient reach, and other local conditions.

III Separate guidance has been issued that provides advice on the application of the Model Standards when considering attaching conditions to its licences.

IV The 1960 Act refers to caravans and caravan sites, however, these terms have become increasingly inappropriate as the residential caravan site contains homes of a much more permanent nature. The more commonly used terms are mobile or park homes. The term park home, is used throughout these Model Standards and has the same definition as mobile home as defined by the Mobile Homes Act 1983, "park" means a caravan site as defined in section 1(4) of the 1960 Act, and “mobile home” and “park home” means a caravan as defined in section 29(1).
Explanation for the proposed changes

- *The change of year in the title is necessary to update the Model Standards.*

- *We have added Part III because the Local Authority Licensing of Park Home Estates Report stated that further explanation was often required and ‘a code of guidance should be developed and issued alongside revised Model Standards.’ The guidance will help Local Authorities judge how serious a breach is and the most appropriate action to take. It will also help residents and park owners ensure compliance. The ODPM and Chartered Institute of Environmental Health will work together to ensure the guidance is up to date.*

- *We have added Part IV for the reasons set out in the text. We propose to replace the word “site” with the word “park” throughout the document.*

Implementation

There are no additional costs as there are no new burdens created. The guidance will allow significant cost savings as it will mean that local authorities will be examining the same issues as neighbouring authorities. This should lead to fewer appeals about conditions attached to licences and against enforcement action taken. Currently local authorities are independently reviewing their site licences, without any guidance. The cost savings will arise in the Model Standards and guidance being done by central government. These cost savings are discussed in greater detail in the attached Regulatory Impact Assessment.

---

6 Local Authority Licensing of Park Home Estates Report (DTLR 2000) p.83
GUIDANCE NOTE

The Model Standards 2005: Park Home Parks are made under Section 5(6) of the Caravan Sites & Control of Development Act 1960 and a local authority must have regard to them when attaching conditions to a site licence.

The Model Standards do not apply to parks used solely for caravan holiday homes or touring caravans or to parks occupied by gypsies and travellers or agricultural workers.

The Standards as laid out represent what would normally be expected as a matter of good practice on such parks. They should be applied with due regard to the particular circumstances of each case, including the physical character of the park, any facilities or services that may already be available within convenient reach, and other local conditions. It may not be appropriate, for example, to apply all conditions to smaller parks.

When they are applied, however, these Standards should be seen as flexible in individual cases to allow the merits of each case to be taken into account. There may be certain circumstances where higher standards might be justified. Local authorities have considerable discretion provided that they do not impose conditions which are unduly burdensome. To fall significantly below the Model Standards could leave a local authority open to criticism by the Local Government Ombudsman or to legal action if somebody suffers injury as a result.

The use of the word “should” within the Standards allows officers to take account of individual circumstances. It is also necessary as Model Standards are guidance. The final decision to prosecute should always be with the local authority. However, they should be able to justify any decision reached.

Also, it should be clear that local authorities are encouraged to write their own site licence conditions having regard to the local circumstances of the park and using the Model Standards, Guidance and Enforcement notes as a reference.

Enforcement

There are no new enforcement issues with this section.
Chapter 4

Model Standards: Site Boundaries Revision

Background

Section 1 of the 1989 Model Standards, entitled ‘site boundaries’, discusses the layout of the park area and how the park should be enclosed.

1989 Standard – Site Boundaries

The boundaries of the site should be clearly marked, for example by fences or hedges. In addition, the site owner should give the local authority a plan of its layout. It is recommended that a 3m wide area should be kept clear within the inside of all boundaries.

We propose to reword to:

2005 Standard – The Park and its Boundaries

The boundaries of the park should be clearly marked. In addition, the park owner should give the local authority an up to date plan, of suitable quality, highlighting its layout. There should be a gap of 3 metres within the inside of all boundaries.

Explanation for the proposed changes

- The mention of fences and hedges is removed as this makes the Standards too specific and could preclude other types of barrier which the local authority may wish to allow.

- Under the 1989 Standard, plans of variable quality were submitted to local authorities. The requirement that plans should be of ‘suitable quality’ allows a minimum Standard to be provided, aided by guidance. This is to meet the aim of Standards not dating because of new technical requirements. Necessary quality also aids fire safety by ensuring the relevant bodies have the information they require, such as the Fire and Rescue Service who may wish to have a map detailing all the fire points.
Implementation

These new terms are not more onerous on local authorities.

Park owners may feel that there is extra expense in providing detailed plans of their park, however:

- any re-development work on the park should have detailed plans and therefore these can be adapted and sent which will minimise the cost;

- this cost will be further reduced because of the need to provide detailed plans for new pitches as part of the changes to secondary legislation currently being taken forward under section 208 in the Housing Act 2004;

- plus the existing requirement in the 1989 Standards to provide a plan; and

- additionally the plan can be used as the park plan, which should be displayed at the entry to the park.

All added together these suggest that there should be no extra cost to park owners. The changes to boundary space allow a wider variety of barriers to be used which could result in cheaper methods being employed by park owners and instigating savings.

The new terms have no impact on the position of residents.
GUIDANCE NOTE

The boundary should provide a physical barrier to unauthorised access and clearly define the limit of the park owner’s responsibility. The boundary should be suitably marked and properly maintained. This boundary could be constructed of any number of things such as a fence, hedge, wall or natural feature.

The licence holder should give the local authority a plan of the layout of the park indicating all features which are of concern to the local authority and Fire and Rescue Service, for example showing the position of park homes, roads, footpaths, fire points, gas storage and structures.

A revised plan should be submitted whenever the licence holder is planning development or changes to the park layout to ensure that local authorities are kept aware of any changes that occur on the park. This will enable the local authority to ensure site licences are kept up to date and breaches can be remedied quickly and efficiently. These plans should be provided at the park owner’s expense. Best practice would mean a copy of these plans was sent to the emergency services as well so that they are aware of access points in the event of an emergency.

The 3m separation space serves two purposes:

- protection from fire; and
- privacy from whatever is on the other side of the boundary, such as a road, and other developments.

The measurement should be taken from the external wall of the park home and the relevant consideration of bay windows/guttering should be taken into account in accordance with other sections of this guidance (see diagram under Density, spacing and parking section). Where the potential threat from fire is minimised, such as when the park is adjacent to fields or water then this requirement can be relaxed.

Enforcement

If a new licence is to be issued to an existing park it is probable that the boundaries of the park are well established and that to alter the existing licence condition in respect of boundaries would cause unnecessary hardship.

When considering taking action under this section the local authority should make a risk assessment of the situation to minimise/prevent any hardship.

Some of the factors that the local authority may wish to take into account include:

1 – What else is in the separation space?
2 – The fire resistance of the home.
3 – Means of escape from the home.
4 – Are smoke alarms fitted in the home?
5 – What is on the other side of the boundary?
Chapter 5

Model Standards: Density and Space between Caravans
Revision

Background

This section, parts 2 and 3 of the 1989 Standards, examines the separation gap between park homes and explains what can and cannot be placed in the gap.

1989 Standard – Density and Space between caravans

Subject to the following variations, every caravan should be not less than 6 metres from any other caravan which is occupied separately and not less than 2 metres from a road. The point of measurement for this distance and for porches, awnings etc is the exterior cladding of the caravan.

- Porches may protrude 1m into the 6 metres and should be of the open type.
- Where awnings are used, the distance between any part of the awning and an adjoining caravan should not be less than 3 metres. They should not be of the type which incorporates sleeping accommodation and they should not face each other or touch.
- Eaves, drainpipes and bay windows may extend into the 6 metre space provided the total distance between the extremities of 2 adjacent units is not less than 5.25 metres.
- Where there are ramps for the disabled, verandas and stairs extending from the unit, there should be 4.5m clear space between them and two such items should not face each other in any space. If they are enclosed, they may need to be considered as part of the unit and, as such, should not intrude into the 6m space.
- A garage, a shed or a covered storage space should be permitted between units only if it is of non-combustible construction (including non-combustible roof) and sufficient space is maintained around each unit so not to prejudice means of escape in case of fire. Windows in such structures should not face towards the units on either side. Car ports and covered walkways should in no circumstances be allowed within the 6-metre space. For cars and boats between units, see Standard (27).

The density should be consistent with safety standards and health and safety requirements. The gross density should not exceed 50 caravans to the hectare, calculated on the basis of the useable area (i.e., excluding lakes, roads, communal services and other areas unsuitable for the siting of caravans) rather than the total site area.
We propose to reword to:

2005 Standard – Density, Spacing and Parking between Park Homes

Subject to the following variations, every park home should be not less than 6 metres from any other park home which is occupied separately. Each park home should not be less than 2 metres from the road. The point of measurement for all distances is the exterior cladding of the park home.

a) Porch may protrude 1 metre into the separation zone and should not exceed 2 metres in length and 1 metre in width and provide only one external door as a means of access to and escape from the park home.

b) Eaves, drainpipes and bay windows may extend into the 6 metre space provided the total distance between the extremities of 2 adjacent units is not less than 5 metres.

c) Where there are ramps, verandas and stairs extending from the park home (including those for disabled) there should be a 4.5 metre clear space between adjoining homes. Any two such items should not face each other in any separation zone.

d) Any structure should be permitted in the separation zone only if it made of non-combustible construction and there is sufficient space maintained around each park home so as not to prejudice any means of escape in case of fire.

e) Windows in structures should not face towards the park home on either side.

f) Car ports and covered walkways unless made of non-combustible construction should in no circumstances be allowed within the 6-metre space. For the details on cars and boats between units, see Standard on Parking.

3. The density should be consistent with safety standards and health and safety requirements. The gross density should not exceed 50 park homes to the hectare, calculated on the basis of the useable area rather than the total park area.

Explanation for the proposed changes

• We have changed section 2a) so that all types of porches are acceptable. This change means that the means of escape is not precluded but residents, with the relevant permission, (planning and park owners) can enjoy the extra space.

• We have deleted the section referring to awnings. This is because this refers to holiday caravan sites which have their own Model Standards.

• There are no changes to new section 2b) except we propose reducing the 5.25m gap to a 5m gap to bring into line with other clauses in this chapter.

• Section 2c) removes part of the 1989 Standard, which did not allow for two items to face each other. It now allows this as long as the 4.5 m gap is not encroached upon. It also removes the issue of enclosed features.

• The old Standard 2d) was too prescriptive. The new version now clearly states it allows any structure which meets the non-combustible standards and not affecting means of escape is fine.
• There is no change to section 2e).

• Section 2b has been placed separately to give greater emphasis on this particular area by separating from the earlier structures section above.

• Section 3 only has had the unusable areas removed as the list is not exhaustive and such additions should be placed in guidance.

Implementation

The revised Standard removes conditions and thus reducing costs for park owners. There are no new Standards for the local authority to enforce and existing Standards are reducing resulting in less need for enforcement activity from local authorities. The revised Standards also mean residents will have less enforcement for minor breaches.

GUIDANCE NOTE

The separation space is required for two reasons:

• Protection from fire; and

• Privacy from whatever is on the other side of the separation zone, such as a road, and other developments.

The fire retardant-qualities of park homes were last tested in a 1989 report. It highlighted that the 6m gap was needed to protect neighbouring homes from fire spread. New homes are all built to BS3632 which requires higher levels of insulation and protection than its 1989 predecessor.

Porches are likely to be a major issue because residents feel that they help to personalise their home and offer extra space whereas they can also be seen by enforcers as objects that impede escape in the event of fire. It is important to remember that such structures should not render the home immobile and thus take the home outside the definition of a caravan as outlined in the Caravan Sites Act 1968. Additionally porches may require planning permission as caravans do not benefit from permitted development rights. Sometimes planning consent may be given for such structures, but the structure may then breach the licensing requirements. It is important to regularly liaise with planning officers in your council to ensure that the dual control of park homes through the planning and environmental health departments is effectively managed. However if such a conflict does occur the licensing conditions are overriding.

If a porch is of non-combustible construction and outside of the separation zone it should not be the subject of enforcement proceedings unless it breaches another condition such as making the home immobile.

The porch should be easily demountable from the home to ensure continued mobility.

7 Fire Spread between Park Homes and Caravans, DOE, 1989
GUIDANCE NOTE (continued)

Previously in the 1989 Standards, we have tried to specify all requirements that should and should not be in the separation space. Some examples of structures under d) include sheds, garages or covered storage.

The importance of what can be in d) is two fold:

1) Is it a fire hazard?

2) Does it preclude escape if there was a fire?

Such structures for example sheds should be allowed on each pitch providing that, if it is located in the six-metre separation zone, it is of non-combustible construction.

It is essential that local authority discretion is exercised to ensure suitable access to their home for those with disabilities.

It is important to note this clause does not prevent these features being permitted, when they are outside of the separation zone of any other home.

The density calculation is based on planning controls. This helps to stop the overdevelopment of parks. Unusable areas include lakes, roads, amenity areas, communal services as well as car parks. Again this list should not be seen as exhaustive.

Additionally this section will include guidance and diagrams that was consulted on to allow cladding to older home in the definition of a caravan consultation paper that recently finished. While the proposals are being finalised to take account of the comments received on this consultation, we can not fully complete this section, we have included for reference the diagram from that consultation for illustrative purposes at Annex D.
**Enforcement**

The 6m separation zone and the permitted contents of the separation zone is a major area of contention in the Model Standards. If the separation gap is inadequate there is a vital decision for the local authority on whether to take enforcement action or not.

There are no easy answers, but the local authority should take the following into consideration:

a) This is someone's home. It should not be moved except as a last resort, when the risk is believed to be too great.

b) What steps can be taken to lessen the risk and whether the risk may still remain?

c) Who will pay for any remedial work, as siting of homes is the responsibility of park owners? (The agreement between park owner and home owner requires the park owner to pay all the costs of moving the home.)

d) What are the results of consultation with any other interested parties?

A distance of less than 6 metres between of park homes could be acceptable where the facing walls of two homes are specially constructed (or treated) for fire resistance, or where there is a dividing fire barrier. However, there is still a need for the privacy of residents to be taken into consideration.

Historical breaches cause the most problems.

When considering taking action under this section the local authority should risk assess the situation to see how the potential problem can be minimised. Some of the factors that the local authority may wish to take into account include:

i) What else is in the separation space?
ii) The fire resistance of the home.
iii) Means of escape from the home.
iv) Smoke alarms fitted in the home.
v) What is on the other side of the boundary?
v) New products that aid fire resistance, which we would not want to preclude.
Chapter 6

Model Standards: Roads, gateways and footpaths Revision

Background

This section, section 4 in the 1989 Standards, refers to the adequacy of the infrastructure of the park.

1989 Standard – Roads, gateways and footpaths

Roads and footpaths should be designed to provide adequate access for fire appliances. (Detailed guidance on turning circles etc. is available from fire authorities). Roads of suitable material should be provided so that no caravan standing is more than 50 metres from a road. Where the approach to the caravan is across ground that may become difficult or dangerous to negotiate in wet weather, each standing should be connected to a carriageway by a footpath with a hard surface. Roads should not be less than 3.7 metres wide, or, if they form part of a clearly marked one way traffic system, 3 metres wide. Gateways should be a minimum of 3.1 metres wide and have a minimum height clearance of 3.7 metres. Footpaths should not be less than 0.75 metres wide. Roads should have no overhead cable less than 4.5 metres above the ground. Roads and footpaths should be suitably lit. Emergency vehicle routes within the park should be kept clear of obstruction at all times.

We propose to reword to:

2005 Standard – Roads

a) Roads should be designed to provide adequate access for emergency vehicles. Roads of suitable material should be provided so that no park home is more than 50 metres from a road.

b) Roads should not be less than 3.7 metres wide, or, if they form part of a clearly marked one way traffic system, 3 metres wide. One-way systems should be clearly signposted.

c) Where existing two way roads are not 3.7 metres wide, passing places should be provided where practical.

d) Emergency vehicle routes within the park should be kept clear of obstruction at all times.

2005 Standard – Gateways and overhead cables

e) Vehicular access and all gateways should be a minimum of 3.1 metres wide and have a minimum height clearance of 3.7 metres.

f) Roads should have no overhead cable less than 4.5 metres above the ground.

2005 Standard – Footpaths

g) Each park home should be connected to a carriageway by a footpath with a hard surface. Footpaths should not be less than 0.75 metres wide.

h) Roads and footpaths should have adequate lighting to allow pedestrians safe movement around the park during the hours of darkness.
Explanation for the proposed changes

• The amendments in a) are suggested to display more clearly the key component elements of this section of the model standards. In their previous form of one solid paragraph of text it was difficult to identify all the component parts.

• The addition of passing places in c) allows existing issues that may exist on road widths to be resolved with minimum disruption to existing residents.

• The revised Standard e) is about vehicle access to the park and therefore it is important that it is not just gateways that are the specified height. Also ‘gateways’ has been changed to ‘all gateways’ as there may be several of these around the park.

• The revision g) clarifies that all park homes need suitable access. The position of this Standard has also been swapped with the cable amendment above to help the flow of the document.

• This revision b) gives greater clarity of what type of lighting is required.

Implementation

Again the new terms are generally not more onerous. The only case which may cause extra cost to park owners is adequate street lighting and footpaths. We feel that these should be part of the overall park redevelopment process and therefore be phased in over a number of years. As the implications of the Disability Discrimination Act 2001 already exist, the footpath clause is not a new burden.

GUIDANCE NOTE

Detailed guidance on turning circles etc. is available from Fire & Rescue Service. Roads should be constructed of tarmacadam or concrete with suitable compacted base. Gravel roads should not be accepted as gravel may enter and obstruct drains and will cause dust in dry weather. In practice all standings should be connected to the roads by paths with hard surfaces such as concrete, stone, slabs, bricks etc. This is to ensure access is still possible in wet conditions.

There should be adequate access to facilities for disabled people in line with the Disability Discrimination Act 2001 and all businesses should comply with such legislation. This could mean that paths may need to be widened to allow wheelchair access or ramps installed for access to offices.

Gateways should have enough clearance to allow safe entry for emergency vehicles and new homes on lorries.

The lighting for paths and roads provided should be artificial lighting adequate to allow safe movement around the park during the hours of darkness. There is much debate on what adequate lighting entails. It is important to remember what the lighting is for and that is to ensure pedestrians can safely navigate through the park. Many parks use low lighters rather than traditional street lamps and these work well as long as they are well maintained and plants/vegetation are not allowed to grow around them and stop the light emitting effectively.
Enforcement

The enforcing on poor roads should be on a fit for purpose basis. The road should be able to handle normal loads without breaking up and be usable in all seasons and all weather conditions.

The adequacy of lighting is another area that is hard to define in enforcement terms. Under the new terms there is a need to ensure that the safe movement of people around the park is possible. The easiest test which can be used is whether when standing between lights a person is unable to be seen by the naked eye for more than a few metres.
Chapter 7

Model Standards: Hard standing Revision

Background

This section of the Model Standards, currently section 5, refers to the base on which the park home is sited.

1989 Model Standard – Hard Standing

Every caravan should stand on a concrete hard-standing which should extend over the whole area occupied by the caravan placed upon it, and should project a sufficient distance outwards from its entrance or entrances to enable occupants to enter and leave safely.

We propose to reword to:

2005 Standard – Park Home Bases

Every park home should stand on a concrete base or hard-standing which should extend over the whole area occupied by the park home placed upon it, and should project a sufficient distance outwards from its entrance or entrances to enable occupants to enter and leave safely. These hard standings should be constructed to the industry code of practice.

Explanation for the proposed changes

- We have proposed the rewording of this because the title did not make it clear what it actually refers to. By adding in the exact necessities of this Standard it becomes clearer what is required. The industry Standard is currently the Gold Shield scheme. It is known throughout the sector and can be easily interpreted by local authority officers. Rather than specifying the current Standard required it was thought that by using these words the officer could ensure they use the most up to date Standard was adhered to. This meets the recommendation of the Local Authority Licensing of Park Homes Report which said that we should, ‘ensure Model Standards are not dated simply because new regulations are issued.’ It also meets the aim to ‘Ensure all Standards met current technical Standards.’

Implementation

New homes are usually sited using the Gold Shield scheme. Therefore as this is already existing practice the proposal will be cost neutral.
GUIDANCE NOTE

Concrete hard standing should be laid with a good hardcore base to a minimum depth of 150mm, well compacted. The hard standings should be laid in accordance with the industry code of practice issued by the trade associations (National Park Homes Council and The British Holiday and Home Parks Association).

Particular attention should be paid to the terrain of the park before a base is laid, which may mean a thicker base is needed.

The base should be sufficient to handle the load placed upon it by the home and its contents. It is important to note that the siting of homes and the concrete base are the responsibility of the park owner and they should undertake any repair work on the base.

Enforcement

If a home has no base then the same consideration as under density and spacing should be taken into account.

a) This is someone's home. It should not be moved except as a last resort, when the risk is believed to be too great.

b) What steps can be taken to lessen the risk and whether the risk may still remain.

c) Who will pay for any remedial work, as siting of homes is the responsibility of park owners?

d) What are the results of consultation with any other interested parties?

Older homes may not have any bases and it is important to assess the likely risk of damage to the home if it is moved against the safety of the resident. Often homes have been on such bases for years and therefore moving the home may not be the best option to follow. The question must be asked:

Does it serve any purpose to move the home? The decision is easier if subsidence has occurred but if the home remains safely sited, in such cases there is little to be gained in enforcing on this point. Enforcement officers should bear in mind the possibility of asking for a new base when the home is replaced.
Chapter 8

Model Standards: Introduction to Fire Fighting Appliances

Background

This covers a range of measures which are discussed in the following chapters, which outline the fire provisions on a park. The responsibility for enforcing these has changed under the Regulatory Reform (Fire Safety) Order 2005 and so the following will be added as a precursor to the guidance. This chapter also discuss changes to the title and the addition to the guidance note.

Explanation for the proposed changes

• **We have amended the title of this part of the Standards to more accurately reflect its contents. At the beginning of the section we refer to the new Regulatory Reform (Fire Safety) Order 2005 which will apply to parks and comes into force on 1 April 2006.**

• **It will require park owners to undertake a fire risk assessment of the park as a whole, excluding the homes themselves, as they are excluded from the remit of the Order.**

Implementation

The requirements of the Order are not new as the risk assessment requirement is identical to that contained in Health and Safety Law, and therefore there are be no additional costs arising from these Standards.

GUIDANCE NOTE

The Regulatory Reform (Fire Safety) Order 2005 (RRO) will come into force on 1 April 2006. It will apply to parks and will require the park owner to undertake a fire risk assessment of their premises, along the lines of requirements under Health and Safety Law. Guidance will be available on the ODPM website in January 2006. In addition, an information leaflet, with simple instructions on how to complete a fire risk assessment, will be sent to every business in the UK later this year. It will also be available on the Businesslink website.

Although the RRO is the main piece of fire law, the Model Standards should be used to assist owners in completing their risk assessment, and to assist those enforcing on parks as to what is required.
Enforcement

Enforcement of fire safety requirements will be the responsibility of the local Fire and Rescue Service. If local authority officers identify matters of concern with regard to fire safety they should contact fire service colleagues. This enforcement section applies to all the fire sections below up to and including the fire hazard section.
Chapter 9

Model Standards: Fire Points Revision

Background

This section on the Model Standards, currently section 6, refers to the fire points around the park.

1989 Model Standard – Fire Points

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

We propose to reword to:

2005 Standard – Fire Points

These should be established so that no park home or site building is more than 30 metres from a fire point. They should be housed in a weather-proof structure, easily accessible and clearly and conspicuously marked “FIRE POINT”.

Explanation for the proposed changes

- As can be seen, this section remains unaltered, apart from putting the final 2 words in the paragraph in bold type. This gives greater emphasis to their importance.

Implementation

This is a minor change and therefore there are no implementation costs arising from this section.

GUIDANCE NOTE

The siting of the fire points should be so that they are visible at all times, and marked in a way that makes it obvious as to what they are. They will need to be kept clear of any obstructions at all times should they be needed in the event a fire breaks out.
Chapter 10

Model Standards: Fire-fighting equipment Revision

Background

This part of the Standards, currently sections 7-9, refers to the fire-fighting equipment contained around the park.

1989 Model Standard – Fire Fighting Equipment

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 should be situated at each fire point. There should 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. Hoses should be housed in a box painted red and marked “HOSE REEL”.

Where standpipes are not provided but there is a water supply of sufficient pressure and flow, fire hydrants should be installed within 100 yards of every caravan standing. Hydrants should conform to British Standard 750. Access to hydrants and other water supplies should not be obstructed or obscured.

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

We propose to reword to:

2005 Standard – Fire fighting Equipment

Where water standpipes are provided, the water supply should be of sufficient pressure to project a jet of water approximately 5 metres from the nozzle. There should also be a reel that complies with the current British/European Standard, 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 nozzle. Hoses should be housed in a red box and marked “HOSE REEL”. Access to the fire point should not be obstructed or obscured.

Where they are provided, hydrants should conform to the current British/European Standard. Access to hydrants and other water supplies should not be obstructed or obscured.

Where standpipes are not provided or the water pressure or flow is not sufficient, each fire point should be provided with water extinguishers (2 x 9 litres) which comply with the relevant British/European Standard.
Explanation for the proposed changes

- The main change in these 3 sections is the removal of references to specific British Standards. This extends the Standard’s usefulness. In the second section, we have removed the reference to water tanks as parks are now fitted to mains water supply or have a good alternative water source. We have also removed mention of 100 yards as again we feel this is better placed in the guidance. The rest of the wording remains unaltered.

Implementation

Due to the new fire safety legislation, there are no additional cost implications for this new Standard.

GUIDANCE NOTE

The level of fire fighting equipment required will form part of the judgement made by owners under their fire risk assessment.

Whatever decision is reached, it should be remembered that the equipment must conform to the relevant British/European Standard\(^8\).

If hosepipes are provided, they should be of the relevant Standard, and positioned in such a way that they are easily attachable to the mains water supply, if not permanently attached. Any valves connecting the hose to the water supply should be easily accessible. The hose reel should be well maintained and in good working order.

Any hydrants provided on the park should be kept clear of any obstruction in the event that they need to be used. The positioning of mains connected hydrants is the responsibility of the local water provider, and any queries as to whether a park has a hydrant should be directed to them. The positioning of the hydrants should be recorded on the park map, which will assist the emergency service in locating it in the event of an emergency.

Where provided, extinguishers should comply with current British/European Standards. They should only be used if there is not enough pressure for a hose reel.

A water tank with buckets and a pump may be thought unacceptable 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 may be a danger to children and may also become a health hazard.

The Fire and Rescue Service guidance should always be borne in mind if you witness a fire.

Remember – you should only ever fight a fire if you yourself feel it is safe to do so. If there is any doubt, call the Fire and Rescue Service.

\(^8\) Information on British Standards can be found at www.bsi-global.com Guidance to support the Regulatory Reform (fire Safety) Order will also contain the current standards and will be available on the ODPM website.
Chapter 11

Model Standards: Fire Warning Revision

Background

This part of the Standards, currently section 10, deals with the method of warning of the outbreak of a fire.

1989 Model Standard – Fire Warning

A means of raising the alarm in the event of a fire should be provided at each fire point. This could be by means of a manually operated sounder, e.g. a metal triangle with a striker, gong or hand operated siren. The advice of the fire authority should be sought on an appropriate system.

We propose to reword to:

2005 Standard – Fire Warning

A means of raising the alarm in the event of a fire should be provided at each fire point.

Explanation for the proposed changes

- We have removed the reference to consulting the fire authority and examples of possible sirens as we felt it was better placed in the guidance to support the Standards.

Implementation

There are no costs arising from the change made.

GUIDANCE NOTE

The means of raising the alarm in the event of a fire should be appropriate to the size and layout of the park. If you are unsure of which form of raising the alarm is the most suitable to your park, then contact the local Fire and Rescue Service, who will be able to advise you.

Alarm sounders should be purpose designed such as manual rotating bells or electronically operated bells or sirens. Alarm sounders should be loud enough to be heard clearly inside every park home or building within a 30 metre radius. This relates to the earlier Standard on fire points which states homes/buildings should not be more than 30 metres from a fire point.
Chapter 12

Model Standards: Maintenance Revision

Background

This part of the Standards, currently sections 11 & 12, deals with the maintenance and testing of fire-fighting equipment.

1989 Model Standard – Maintenance

All alarm and fire fighting equipment should be installed, tested and maintained in working order by a competent person and be available for inspection by, or on behalf of, the licensing authority. A log book should be kept to record all tests and any remedial action.

All equipment susceptible to damage by frost should be suitably protected.

We propose to reword to:

2005 Standard – Maintenance and testing of fire fighting equipment

All alarm and fire fighting equipment should be installed, tested and maintained in working order by a competent person and be available for inspection by, or on behalf of, the licensing authority or the Fire and Rescue Service. A record should be kept of all testing and remedial action taken.

All equipment susceptible to damage by frost should be suitably protected.

Explanation for the proposed changes

- As can be seen, we have amended the title of this section and included testing so as to make it more apparent that this is required. In the first paragraph, we have specifically mentioned that any maintenance and testing records must be made available to the Fire and Rescue Service as well as the local authority. This is a legal requirement under the RRO, so by placing it here, it becomes clear to the park owner as to what is required. All other parts of the Standards remain unaltered.

Implementation

There are no costs arising from the change made.
GUIDANCE NOTE

It is important that all fire alarm systems and fire fighting equipment are regularly inspected and maintained. The suggestion is that these checks should be carried out on an annual basis. Most fire safety companies are members of certification schemes run by organisations such as the Fire Industry Confederation⁹. Records should be kept of any testing and when the most recent inspections were carried out. The record of all tests and inspections should be kept on the park for possible inspection by relevant bodies.

All equipment should be protected from the elements most noticeably frost if they are placed outside.

⁹ More information can be found at www.the-fic.org.uk
Chapter 13

Model Standards: Fire Notices Revision

Background

This section deals with fire action notices, and the wording that should be used on them.

1989 Model Standard – Fire Notices

A clearly written and conspicuous notice should 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 should include the following:

“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 phone is located at ……..).
IV. Attack the fire using the 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.”

We propose to reword to:

2005 Standard – Fire Notices

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

“On discovering a fire:
I. Ensure the park home or park building involved is evacuated.
II. Raise the alarm.
III. Call the fire brigade (the nearest phone is sited at ……..).
IV. Attack the fire using the fire fighting equipment provided, **IF IT IS SAFE TO DO SO**.

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

Explanation for the proposed changes

- The wording of the fire action notice remains largely unaltered, with the only exception being placing the words “**IF IT IS SAFE TO DO SO**” in capital and block letters. The main part of the wording has been kept as a fire action notice has legal standing under the Health and Safety (Safety Signs and Signals) Regulations 1989, and the wording used is mandatory.
Implementation

There are no costs involved as the requirement for a notice is contained in Health and Safety Law as well and should be being complied with.

GUIDANCE NOTE

The fire action notice, as described in the Model Standards, should be placed clearly and conspicuously and describe what should happen in the event of a fire being discovered.

As stated in the Standards, it is in everyone’s interest to know the procedures in place as to what to do in the event of a fire. There is no suggestion that all residents should be trained in the use of the equipment, but clear and concise instructions on how to use the equipment provided for use in the event of an emergency should be available at each fire point.

Good practice suggests the address/postcode of the park should be put on the notice to facilitate the arrival of the emergency services, as well as the location of the nearest phone.
Chapter 14

Model Standards: Fire Hazards Revision

Background

This section, currently section 14, deals with fire hazards around the park and their safe disposal.

1989 Model Standard – Fire Hazards

Long grass and vegetation should be cut at frequent and regular intervals where necessary to prevent it becoming a fire hazard to caravans, buildings or other installations on the site. Any such cuttings should be removed from the vicinity of caravans. The space beneath and between caravans should not be used for the storage of combustible materials.

We propose to reword to:

2005 Standard – Fire Hazards

Long grass and vegetation should be cut at frequent and regular intervals where necessary to prevent it becoming a fire hazard to park homes, buildings or other installations on the park. Any such cuttings should be removed from the vicinity of park homes. The space beneath and between park homes should not be used for the storage of combustible materials.

Explanation for the proposed changes

• As can be seen, the only changes are replacing the word “caravan” with “park home”.

Implementation

There are no cost implications arising from the changes made.

GUIDANCE NOTE

Cut grass and vegetation should be removed from the park as soon as practicable. Bonfires should not be used. Vegetation is often used for sight screening but if not properly controlled can compromise the benefits of separating units.

This Model Standard is intended to ensure all necessary precautions are taken to minimise the risk of fire. The inclusion of the words prevent it becoming a fire hazard are important as this allows the local authority to take action on issues that have yet to become a major risk and ensure safety at the earliest stage.

Similar issues to those discussed in the guidance note for density and spacing should be considered.
Chapter 15

Model Standards: Telephones Revision

Background

This section deals with the provision of telephones on parks.

1989 Model Standard – Telephones

An immediately accessible telephone should be available on the site for calling the emergency services. A notice by the telephone should include the address of the park.

We propose to:

2005 Standard – Telephones

An immediately accessible telephone should be available on the site for calling the emergency services. A notice by the telephone should include the address of the park.

Explanation for the proposed changes

- We feel that this section is now obsolete, given that the majority of park homes now have telephones installed. Also, since 1989 the ownership of mobile phones has risen at a huge rate. We therefore feel that the section is not needed any more. We have proposed the location of the nearest phone should be shown, where appropriate, on the fire notice.

Implementation

There are no cost implications arising form the changes made. In fact there are significant cost savings to park operators who have previously had to maintain telephones.
Chapter 16

Model Standards: Storage of liquefied petroleum gas (LPG)
Revision

Background

Section 16 of the 1989 Standards deals primarily with LPG, and matters dealing with the supply and storage of gas.

1989 Standard – Storage of liquefied petroleum gas (LPG)

LPG storage supplied from tanks should comply with Guidance Booklet HSG 34 ‘The Storage of LPG at Fixed Installations’, or where LPG is supplied from cylinders, with Guidance Note CS4 ‘The keeping of LPG in cylinders and similar containers as appropriate.

Where there are metered supplies from a common LPG storage tank, then Guidance Note CS11 ‘The Storage and Use of LPG at Metered Estates’ provides further guidance. In this case and where a British Gas mains supply is available, then the Gas Safety (Installation and Use) Regulations 1984 and the Pipe-lines Act 1962 may also be applicable.

Exposed gas bottles or cylinders should not be within the separation boundary of an adjoining unit.


For mains gas supply, the 1994 Regulations will be relevant for the installation downstream of any service pipe(s) supplying any primary meter(s) and such service pipes subject to the Gas Safety Regulations 1972.

In cases where the site owner supplies gas to caravans on the site, he may need an authorisation to do so from OFGAS under the Gas Act 1986.

We propose to reword to:

2005 Standard – Supply & Storage of Gas

Gas installations, supplies and storage should meet statutory requirements, relevant Standards and Codes of Practice.

LPG (Liquefied Petroleum Gas) cylinders should not be positioned or secured in such a way as to impede access or removal in the event of an emergency.

Explanation for the proposed changes

- The title of this section has been changed to reflect all types of gas and not just LPG. A lot of the old Standards were taken up by mentions of legislation and Standards, and we have moved these references to the guidance, where they are a better fit.
Implementation

There are therefore no costs arising from this change. The changes reflect the legal requirements already in place under other legislation.

GUIDANCE NOTE

For more guidance contact the DTI, HSE or OFGEM.

LPG

• LPG storage supplied from tanks should comply with LP Gas Association\textsuperscript{10} Codes of Practice 1: “Bulk LPG Storage at Fixed Installations” Part 1 “Design, Installation and Operation of Vessels Located above Ground” or Part 4 “Buried / Mounded LPG Storage Vessels” as appropriate. Where there are metered supplies from a common LPG storage tank, then LP Gas Association Codes of Practice 25: “LPG Central Storage and Distribution Systems for Multiple Consumers” provides further guidance. In this case the Gas Safety (Installation and Use) Regulations 1998 are applicable.

• Where LPG is supplied from cylinders, the installation should comply with British Standard 5482 Part 1: 2005.

• Cylinders should be positioned as close as practicable to, but not under, the home. They should not be positioned or secured in such a way as to impede access or removal in the event of an emergency (for example locked cabinets or padlock and chains).

Storage of full and empty LPG (Liquefied Petroleum Gas) cylinders

• Full and empty cylinders, whether under the control of the park owner or the individual homeowner, which are not connected should be stored in accordance with LP Gas Association Code of Practice 7 “Storage of Full and Empty LPG Cylinders and Cartridges.”

Supply of natural gas

For more guidance, contact OFGEM.

• For natural gas supply, service pipes are subject to the Gas Safety (Management) Regulations 1996. The Gas Safety (Installation and Use) Regulations 1998 are relevant for the installation downstream of service pipes.

• In cases where the park owner supplies natural gas to park homes, he may need an authorisation to do so from OFGEM under the Gas Act 1986.

\textsuperscript{10} More information can be found at http://www.lpga.co.uk/
**Maintenance of gas systems and appliances**

LPG (Liquefied Petroleum Gas) bulk tanks and cylinders are subject to statutory regimes for inspection and maintenance under the Pressure Systems Safety Regulations 2000 and the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2004 respectively and require no further inspection.

Natural Gas distribution systems should have an inspection and maintenance regime established under the Gas Safety (Management) Regulations 1996 and the Dangerous Substances and Explosive Atmospheres Regulations 2002.

LPG (Liquefied Petroleum Gas) distribution systems should have an inspection and maintenance regime established under the Gas Safety (Installation and Use) Regulations 1998 and the Dangerous Substances and Explosive Atmospheres Regulations 2002.

Gas systems (including systems for the supply of LPG from cylinders to individual homes) are the responsibility of the home owner. Work (as defined in the Gas Safety (Installation and Use) Regulations) on such systems must be carried out by CORGI Registered installers.

**Enforcement**

Enforcement responsibilities lie as before, but we would suggest liaising with the appropriate bodies to ensure the correct codes of practice and legislation are being followed.
Chapter 17

Model Standards: Electrical Installations Revision

Background

Sections 17-21 of the 1989 Standards, deal with matters regarding electricity supply, its installation and maintenance works.

1989 Standard – Electrical installations

Sites should be provided with an electricity supply sufficient in all respects to meet all reasonable demands of the caravans situated on it.

Any electrical installations on the site, which are not 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, should be installed, tested and maintained in accordance with the provisions of the institution of Electrical Engineers (IEE) Regulations for Electrical Installations for the time being in force, and where appropriate, to the Standard which would be acceptable for the purposes of the Electricity Supply Regulations 1988, Statutory Instrument 1988 No 1057.

Work on electrical installations and appliances should be carried out only by competent persons such as the manufacturer’s appointed agent, the electricity supplier, a professionally qualified electrical engineer, a member of the Electrical Contractors’ Association, a contractor approved by the National Inspection Council for Electrical Installations Contracting, or a qualified person acting on behalf of one of the above. These installations should be inspected periodically: under IEE Wiring Regulations, every year or such longer period (not exceeding 3 years) as is considered appropriate in each case. When an installation is inspected, it should be judged against the current regulations.

The inspector should, within one month of such an inspection, issue an inspection certificate in the form prescribed in the IEE Wiring Regulations which should be retained by the site operator and displayed, supplemented or replaced by subsequent certificates, with the site licence. The cost of the inspection and report should be met by the site owner or licence holder.

If an inspection reveals that an installation no longer complies with the regulations extant at the time it was first installed, any deficiencies should be rectified. Any major alterations and extensions to an installation and all parts of the existing installation affected by them should comply with the latest version of the IEE Wiring Regulations.

If there are overhead electric lines on the site, suitable warning notices should be displayed at the entrance to the site and on supports for the line. Where appropriate, particular attention should be drawn to the danger of masts of yachts or dinghies contacting the line.
We propose to reword to:

### 2005 Standard – Electrical installations

Parks should be provided with an electricity network of adequate capacity to meet safely all reasonable demands of the park homes situated on the park. The park owner should undertake reviews of the total park demand in line with the electrical inspections to ensure there is adequate capacity on the network to meet park electrical demand and that sections are not overloading.

The electrical installations on the park, which are not distributor's works, but are a private network's subject to regulation under relevant legislation, should be designed, installed, tested, inspected and maintained in accordance with the provisions of the latest regulations.

Work on electrical installations and appliances should be carried out only by persons who are competent in the particular type of work being undertaken. These installations should be inspected and tested periodically, as appropriate and a minimum of every three years. When an installation is inspected, it should be judged against the current regulations.

The inspector should, within one month of an inspection, issue an inspection certificate in the form prescribed in regulations which should be retained by the park operator and displayed, supplemented or replaced by subsequent reports, with the site licence.

If an inspection reveals that an installation no longer complies with the regulations extant at the time it was first installed, any deficiencies should be rectified. Any major alterations and extensions to an installation and all parts of the existing installation affected by them should comply with the latest regulations.

If there are overhead electric lines on the park, suitable warning notices should be displayed at the entrance to the park and on supports for the line in accordance with the relevant regulations.

### Explanation for the proposed changes

- A lot of the old Standards were taken up by mentions of legislation and Standards, and we have moved these references to the guidance, where they are a better fit. This meets our aim of ensuring the Standards do not date due to new regulations being published.

### Implementation

There are no costs arising from this change. The changes reflect the legal requirements already in place under other legislation.
GUIDANCE NOTE

Private electricity networks are subject to the Electricity Safety, Quality and Continuity Regulations 2002 (Statutory Instrument 2665) (ESQCR) that can be viewed at the website: http://www.legislation.hmso.gov.uk/si/si2002/20022665.htm.

A park supplied by an electricity network owned or operated by the park owner (whether or not this included sub-metering) would be classed as a “distributor” for the purposes of the ESQCR. It would therefore be subject to those regulations. The ESQCR is supported by a guidance document which provides helpful background information and is available on the website: http://www.dti.gov.uk/electricity-regulations

A competent person to work on electrical installations and appliances can include a professionally qualified electrical engineer, a member of the Electrical Contractors Association, a contractor approved by the National Inspection Council for Electrical Installations Contracting, or a qualified person acting on behalf of the above.

All new installations must be to the current regulations and maintained at that Standard.

Existing installations must meet the Standards in force at the time of installation.

Installations should be inspected a minimum of every three years but ideally annually. The cost of this review should be borne by the park owner.

A Periodic Inspection Report will either state that no remedial work is required to the installation or will make one or more observations on the condition of the installation in relation to the current requirements of BS 7671 (as amended). In the latter case, the report will make a recommendation in respect of each observation, this being denoted by one of the following codes:

Code 1: Requires urgent attention
Code 2: Requires improvement
Code 3: Requires further investigation
Code 4: Does not comply with BS 7671: 2001 as amended......This does not imply that the electrical installation inspected is unsafe.

For any recommendations made by the report, the park owner is responsible for ensuring that, to the extent not less than that necessary to comply with the requirements of regulation 4 of the Electricity at Work Regulations 1989, remedial work is carried out to the installation. The decision as to what the remedial work should be carried out should be made by the park owner as duty holder, in consultation with the person who prepared the Periodic Inspection Report. Advice regards precautions that need to be taken can be obtained from the electricity industry trade association and/or local distribution companies.

Where appropriate, particular attention should be drawn to the danger of any leisure activities that could cause persons to have accidental contact with over head lines. Advice regards precautions that need to be taken can be obtained from the electricity industry trade association and/or local distribution companies.

The regulations regarding electrical installations are extremely complex. Owners of parks should ensure that they have checked requirements for operation of a park with relevant enforcement agencies in the Health and Safety Executive, Department of Trade and Industry Engineering Inspectorate and OFGEM.
Enforcement

Enforcement responsibilities lay as above.
Chapter 18

Model Standards: Water Supply Revision

Background

Section 22, of the 1989 Standards, deals with the supply of water facilities to parks.

1989 Standard – Water Supply

All parks should be provided with a water supply in accordance with appropriate Water Byelaws and statutory quality Standards.

We propose to reword to:

2005 Standard – Water Supply

All pitches on the park should be provided with a water supply sufficient in all respects to meet all reasonable demands of the park homes situated on it.

All new water supplies should be in accordance with all current legislation, regulations and British Standards.

All water installation repairs should be carried out to the relevant Standards that were appropriate at their time of installation.

Work on water supplies and appliances should be carried out only by competent persons.

Explanation for the proposed changes

- The changes made reflect the legal requirement placed on park owners by specific legislation. It meets the aim of the consultation in ensuring that standards are not dated simply because new regulations come out.

Implementation

There will be no cost arising from these changes. These reflect legal requirements already in place under other legislation.
GUIDANCE NOTE

Supplies of water to the park should be provided in accordance with Water Supply (Water fittings) Regulations 1999 and monitored and enforced by the Water Regulations Advisory Service (WRAS).

The issue of sufficient supply will depend on local guidelines in some cases. However minimum water pressure required by each and every home, particularly at peak periods and for homes with modern central heating boilers which require a minimum pressure of 0.5 to 1 bar.

OFWAT lay down service Standards for the water suppliers. Competency is Details can be found on their website at www.ofwat.gov.uk

Enforcement

Enforcement on the conditions of the park remains unaltered.
Chapter 19

Model Standards: Drainage Sanitation and washing facilities
Revision

Background

This section, sections 23 to 25 of the 1989 Standards, deal with the Standards required for drainage and sanitation facilities on parks.

1989 Standard – Drainage, sanitation and washing facilities

Satisfactory provision should be made for foul drainage, either by connection to a public sewer or sewage treatment works or by discharge to a properly constructed septic tank or cesspool approved by the local authority.

Each caravan should have its own water supply and water closet. Each caravan standing should be provided with a connection to the foul drainage system; the connection should be capable of being made air-tight when not in use.

Every site and every hard standing should be provided with an adequate drainage system for the complete and hygienic disposal of foul, rain and surface water from the site, buildings, caravans, roads and footpaths.

We propose to reword to:

2005 Standard – Drainage and sanitation

There should be satisfactory provision for foul and waste water drainage either by connection to a public sewer or sewage treatment works or by discharge to a properly constructed septic tank or cesspool approved by the local authority.

All drainage and sanitation provision should be in accordance with all current legislation, regulations and British Standards. Work on drains and sewers should be carried out only by competent persons.

Explanation for the proposed changes

- We have removed the reference to washing facilities as this is out of date and no longer relevant. We have also removed mentions of caravans having own water supply and toilets as these refer to holiday caravans and are not relevant to these Standards. In the main, the Standard remains unaltered.

Implementation

The new Standard is less burdensome and therefore cost savings will occur.
GUIDANCE NOTE

As with water supplies, provision of sewerage facilities is again overseen by OFWAT and codes of practice are in place.

It is important that all drains and sewers are well maintained and are connected to the appropriate system. If left unchecked, there can be consequences for the health of residents, along with those who live near the park.

Enforcement

Enforcement will remain unaltered from the previous Standards and will be the responsibility of Council Officers. Again links with outside agencies are highlighted.
Chapter 20

Model Standards: Refuse disposal Revision

Background

This section discusses the removal of domestic rubbish from the park.

1989 Standard – Refuse disposal

Every caravan standing should have an adequate number of suitable non-combustible refuse bins with close fitting lids or plastic bags. Arrangements should be made for the bins to be emptied regularly. Where communal refuse bins are also provided these should be of similar construction and housed within a properly constructed bin store.

We propose to reword to:

2005 Standard – Refuse Disposal

Where communal refuse bins are provided these should be non-combustible and housed within a properly constructed bin store.

All refuse disposal should be in accordance with all current legislation and regulations.

Explanation for the proposed changes:

- The reference to caravans having non-combustible bins has been removed as this is a contract term that should form part of the agreement between the resident and the park owner and so the Model Standards is not the correct place to discuss it. The majority of the Standard remains unaltered, with an addition mentioning the local authorities’ responsibilities regarding the collection of waste. Details are contained in the guidance.

Implementation

There are no new costs arising from this requirement. There may be cost savings for home owners regarding the bins, but this is difficult to quantify.

GUIDANCE NOTE

It is a duty on the local authority to collect refuse from the park. Any directions that the authority gives on the placing of bins for collection should be followed.

If communal bins are used, then they should be of a type that is non-combustible and stored properly. These are the responsibility of the park owner. Also, if not undertaken by the local authority arrangements for regular collections of waste from the bins should be made.
Enforcement

Enforcement will need to be carefully handled, as responsibility for refuse collection from council tax payers on residential home parks rests with the local authority. Consultation with council colleagues is therefore essential.
Chapter 21

Model Standards: Parking Revision

Background

This section deals with the parking of vehicles around the park.

**1989 Standard – Parking**

One car only may be parked between adjoining caravans provided that the door to the caravan is not obstructed. Suitable surfaced parking spaces should be provided where necessary to meet the additional requirements of the occupants and their visitors. Plastic or wooden boats should not be parked between units.

We propose to reword to:

**2005 Standard – Vehicle parking**

Suitably surfaced parking spaces should be provided with space for residents’ vehicles on a scale as set out in the local plan.

Cars can be parked in a line between adjoining park homes provided that neither entrance and exit to the park home nor access around the home in the event of emergency is obstructed.

Explanation for the proposed changes

- *The amendments to this Standard will assist in clarifying the position regarding car parking. It gives clarity to the spacing requirements between park homes.*

Implementation

The implementation costs of these requirements will be negligible. Any additional parking space provision will have to be in accordance with local planning policies.
GUIDANCE NOTE

Provision of car parking spaces should always be in line with local planning policy. Where possible, provision of spaces should reflect the current levels of car ownership.

National guidance states that, if permissible, suitably surfaced parking spaces should be provided at a rate of at least 1 and a third space per park home and 1 further space for every 5 homes for visitors. Spacing requirements may vary but should be outlined in local plans. The individual needs of the park, taking into account relevant factors such as transport links and location, and disablement can also be considered when you are deciding on relevant parking requirements.

Parking spaces should follow local plan guidance. National guidance states that they should be 2.4 metres by 4.8 metres and where parking is in rows, the aisle should be 6 metres. Boats should not be parked between park homes.

Enforcement

Council officers should consult local planning policies when enforcing, bearing in mind the size of the park concerned, and the number of cars regularly parked on the park.

Existing parks may not have the space on the park to comply with this rule immediately and so a programme should be devised giving a suitable time for the park owner to comply.
Chapter 22

Model Standards: Recreation space Revision

Background

This section deals with the need for a space for leisure activities on the park.

1989 Standard – Recreation Space

Where children live on the site, space equivalent to about one tenth of the total area should be allocated for children’s games and/or recreational purposes. This provision will normally be necessary because of the limited space available round the caravans, but may be omitted where there are suitable alternative publicly provided recreational facilities which are readily accessible.

We propose to reword to:

2005 Standard – Recreation

Where children may live on the park, suitable space equivalent to about one tenth of the total should be allocated for children’s games and/or recreational purposes. This requirement may be waived where there are suitable facilities within a close proximity to the park.

Explanation for the proposed changes:

- We propose to amend the section to take account of modern recreational Standards. We have not specified how many facilities need to be available and at what distance as this should be dealt with on a case by case basis.

Implementation

Again in most cases the implementation costs will be negligible, as most of the facilities already exist. The standard is less onerous and savings should occur.
GUIDANCE NOTE

A flexible approach should be adopted here, dependent on the requirements of the residents of individual parks. Although the Standard specifically mentions children, the requirements of any members of the park who may want space for recreation should be taken into account.

Where such areas are provided, they should be well maintained, and their continued use be reviewed periodically. Where they are underused they can become used for dumping and become overgrown. Other Model Standards can be used to deal with such problems.

This space can be either one space or the 1/10 can be divided into a number of open spaces depending on councils guidelines.

The demographic of the residents should be taken into account when making this decision but it is felt that such facilities should not be more than a mile from the park.

Enforcement

Council officers should carefully consider the need for enforcement of this section. Each case should be looked at on its own merits, with due regard to the facilities available in the surrounding area.
Chapter 23

Model Standards: Notices Revision

Background

This section deals with the notices that should be displayed on park.

1989 Standard – Notices

A suitable sign should be prominently displayed at the site entrance indicating the name of the site.

A copy of the site licence with its conditions should be displayed prominently on the site.

Notices and a plan should be displayed on the site setting out the action to be taken in the event of an emergency. They should show where the police, fire brigade, ambulance, and local doctors can be contacted and the location of the nearest public telephone. The notices should also give the name and location/telephone number of the site licence holder or his/her accredited representative. At sites subject to flood risk, warning notices should be displayed giving advice about the operation of the flood warning system.

All notices should be suitably protected from the weather and displayed where possible out of the direct rays of the sun, preferably in areas lit by artificial light.

We propose to reword to:

2005 Standard – Notices

The name of the park should be displayed on a sign in a prominent position at the entrance to the park.

A copy of the front page of the site licence should be displayed with details of where the full details can be reviewed.

A plan of the park with park home numbers, to assist emergency services in locating homes should be prominently displayed at the park entrance.

The following information should be displayed in a prominent position on the park:

- The name, address and telephone number of the licence holder(s) and park owner(s) if different.
- The up to date name and telephone number of the park licence holder’s accredited representative for contact in the event of an emergency.
- A copy of the first page of the most recent electrical inspection certificate.
- A copy of the park owner’s certificate of public liability insurance.
- The location of the nearest public phone.
- Warning notices about the local flood warning system and evacuation procedures if appropriate.

All notices should be suitably protected from the weather and from direct sunlight.
Explanation for the proposed changes

- As can be seen we have slightly modified this section of the Standards to make it clearer as to what notices are required. We have included a reminder that a copy of the site licence conditions being given to each resident. A new addition is the requirement to display a copy of the owner’s Public Liability Insurance certificate. The requirement to have PLI comes under the Employers Liability (Compulsory Insurance) Act 1969. Guidance on this is available on the HSE website\(^\text{11}\).

Implementation

All of the sections contained are not new duties and are already either required under other legislation or already in the Model Standards. Therefore there are no new cost implications.

GUIDANCE NOTE

It is important that all notices are protected from the weather and contain all relevant park information, including contact details for the park manager.

As complying with the site licence is a contract term, all residents should be given a copy of the site licence conditions which should contain contact details of the relevant local authority and the department responsible for enforcing the site licence conditions.

One of the notices should contain contact details for police, ambulance and Fire and Rescue Services for those incidents of a non-emergency nature. It would also be of use to have the contact details for the water provider and gas companies, in the event of leaks in both of these cases.

It is important for the emergency services to know quickly locations on the park so a well drawn park map, possibly showing such items as hydrants, road names etc, is essential to avoid any time being wasted.

If a park is prone to flooding, then details of flood warning systems should also be displayed on the board. Further guidance on flooding can be found in the flooding chapter.

Any other notices that are required by the resident will be available from the park manager.

Enforcement

The notices required are common sense and hopefully should be provided as standard. We would expect enforcers to remind park owners of their responsibilities and have the matter dealt with in a low key manner.

\(^\text{11}\) http://www.hse.gov.uk/pubns/hse40.pdf
Chapter 24

Model Standards: Flooding

Background

The risk to parks from flooding has become more apparent in recent times. It was decided therefore that a new section to the Model Standards was required.

We propose to add the following:

**2005 Standard – Flooding**

All owners of parks should establish whether their park is at risk from flooding by referring to the Environment Agency’s Flood Map. Where there is risk from flooding, the owners should consult the Environment Agency for advice on likelihood of flooding, depths and velocities that might be expected, and the availability of a warning service.

Where a flood risk exists for a park, the owner shall display flood warning information and procedures for the benefit of all.

Explanation for proposed changes:

*This is a new section, and as such does not replace any previous section.*

Implementation

There should be minimal costs in implementing these requirements, in addition, the Environment Agency will have some plans in place for the local area.

**GUIDANCE NOTE**

It is important that if a park is in an area susceptible to flooding, that procedures are in place to ensure that all those on the park are alerted quickly, and that they are aware of any evacuation procedures that may be in place. A notice should be prominently displayed with all relevant information.

The Environment Agency website\(^\text{12}\) has details on what to do, and literature on what businesses can do if they are in a flood risk area. The website also has a mapping service which will show you if your park is at risk. They will also be able to tell you what information to give to residents. Local authorities in areas prone to flooding may have officials who co-ordinate action in the event of flooding.

\(^\text{12}\) [http://www.environment-agency.gov.uk/subjects/flood/?lang=e](http://www.environment-agency.gov.uk/subjects/flood/?lang=e)
Enforcement

Officers should ascertain whether or not parks in their area are susceptible to flooding and to liaise with colleagues within their area dealing with Civil Resilience issues. Checks should be made to ensure that parks are included on any local authority evacuation plans which may exist.
ANNEX A

List of Key Organisations to be consulted

All Local Authorities in England and Wales
British Holiday & Home Park Association
Chartered Institute of Environmental Health
Chief and Assistant Chief Fire Officers Association
Fire and Rescue Service
Fire Brigades Union
Guild of Park Homes Services
Health & Safety Executive
Independent Park Home Advisory Service
National Association for Park Home Residents
National Caravan Council
OFGEM
OFWAT
Other Government Departments
Park Home Legal Services Ltd
Park Home Resident Action Alliance

The above list (in alphabetical order) is not a definitive list of groups and organisations that have been consulted. If there are other organisations which ought to see a copy of this paper, but which are not on the above list, please contact us with details.
ANNEX B

Consultation Criteria

The Government has adopted a code of practice on consultations. The criteria below apply to all UK national public consultations on the basis of a document in electronic or printed form. They will often be relevant to other sorts of consultation.

Though they have no legal force, and cannot prevail over statutory or other mandatory external requirements (e.g. under European Community Law), they should otherwise generally be regarded as binding on UK departments and their agencies, unless Ministers conclude that exceptional circumstances require a departure.

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.

2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.

3. Ensure that your consultation is clear, concise and widely accessible.

4. Give feedback regarding the responses received and how the consultation process influenced the policy.

5. Monitor your department’s effectiveness at consultation, including through the use of a designated consultation co-ordinator.

6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

The full consultation code may be viewed at: www.cabinet-office.gov.uk/regulation/Consultation/Introduction.htm

Are you satisfied that this consultation has followed these criteria? If not, or you have any other observations about ways of improving the consultation process please contact:

Adam Bond, ODPM Consultation Co-ordinator, Room 2.19, 26 Whitehall, London, SW1A 2WH; or by e-mail to: adam.bond@odpm.gsi.gov.uk
Annex C

Partial Regulatory Impact Assessment (RIA)

Title of Proposal
1. Revising the Model Standards for Park Homes and issuing of guidance.

Purpose and Intended Effect of Measure

Objective
2. To bring the Model Standards up to date, taking into account new legislation and standards.

Background
3. The Park Homes Working Party recommended that Model Standards should be updated to take into account updated standards and other legislation. The Standards were previously updated in 1989 and it was felt by stakeholders that a complete overhaul was long overdue. The Standards form the basis for the licences under which parks operate. The current Standards contain references to Acts and Standards which have been superseded by other measures.

Rationale for government intervention
4. We wish to ensure that the Standards are accurate and timeless. The current 1989 Standards as mentioned in Paragraph 3 contain references to legislation and Standards now out of date. This can lead to confusion for both those enforcing licensing requirements on parks and to the owners trying to comply with licence conditions. If this situation was allowed to continue, it could lead to lengthy legal disputes and parks being run down.

5. If we left the situation as it is we would not be fulfilling the commitment the Government gave when responding to the Park Homes Working Party report. The Report recommended an overhaul of the Model Standards and we agreed to this in our response to that report.

Consultation

Within government
6. We have consulted with colleagues in the Scottish Executive and the National Assembly for Wales.

7. We have also consulted various Government departments such as the Small Business Service, DEFRA, DTI, DCMS, OFGEM, OFWAT, and local authorities.
Public consultation

8. This is our formal consultation, although a number of informal meetings have taken place with stakeholders whilst we have been preparing these proposals.

Options

9. 2 options have been identified:

   A) Do nothing.
   B) Revision of all the Standards as outlined in this consultation paper.

Option A – Do nothing

10. This option would mean that the Standards, which have not been revised since 1989, would become more outdated. Mention is made in the 1989 Standards of various pieces of legislation, some of which have become obsolete. It was felt therefore that this situation was not acceptable. Also, the Government has made public commitments to the updating of the Model Standards. This would lead to each local authority having to individually update licences which could prove costly and result in considerable variances in site licence conditions across the country.

Option B – Wholesale review of the 1989 Standards

11. Given that the Standards have been in place since 1989, and no updating work has been undertaken since that time, it was felt, not only by the Government, but by all stakeholders, that a wholesale reform of the Model Standards was required.

12. Indeed, the need for the Standards to be updated was a recommendation in the report of the Park Home Working Party and the recent consultation on site licensing meant that matters needed to be taken forward.

Costs and Benefits

Sectors and groups affected

13. The following sectors and groups will be affected:
   • local authorities;
   • park owners;
   • park home owners.

Race equality assessment

14. We feel that the policy will affect all groups equally across the sector and that no group will be greatly affected by the proposals.

Health impact assessment

15. Improvement on current situation as new Standards leads to better enforcement as Standards are clearer. This means all parties do not have to go through the stresses of enforcement action especially residents who are mainly elderly and vulnerable.
Rural considerations

16. This will have some impact on small rural firms, as most of the parks are in rural areas and are run by small and micro businesses. The proposed changes will be considered good for businesses, with impact on business overall being positive in reducing burdens.

Breakdown of costs and benefits

Option A – Do nothing

17. Economic

In the short term, the economic benefit of doing nothing would be that no changes would need to be made to site licences, therefore saving local authorities money from the issuing of revised licences, and park owners money in not having to make changes on the park. However as a licence is only issued as and when it is needed and not because we revise the Standards this saving is minimal.

However in the longer term, costs will arise from having out of date Standards being used and possible conflicting legislative requirements. Costs would arise on all sides, local authorities from possible enforcements action, and park owners from any major changes that they would have to make as a result. Some councils in Hampshire set up a working group late in 2003 to examine revising site licence conditions. In total 8 council officials attended 6 meetings as well as undertaking work outside of the meeting over a period of 6 months. If we estimate that this is 6 months work for 1 council official, we get rough costs of £15,000. This was just to revise the Standards. If similar schemes were carried out throughout the country and each covered 50 parks then the revision would cost $(2000 \text{ parks}/50) \times £15,000 = £600,000$.

Additionally each LA then had to implement and consult park owners on the new conditions. This took a further £15,000, this figure is made up on the assumption of 15 parks to be implemented on with consultation costs and discussion of £1,000 per park due to discussion of non model standard conditions and £500 for park owners. Nationally this would be £1,000* 2,000 parks = £2,000,000 for local authorities and £1,000,000 for park owners collectively.

18. Environmental

In the short term, there would be no environmental benefits from doing nothing.

In the longer term, environmental damage could be caused if Standards had to be brought up to date quickly with some irreparable damage already having occurred. Most noticeably with the risk from flooding.
19. Social

There are no real social benefits to be gained from doing nothing.

However, there may be costs in the long term from doing nothing as there could be a reduction in the Standards and physical characteristics of the park if the Standards are not brought up to date.

**Option B – Wholesale review**

20. Economic

The benefits will be felt in the long term with better Standards of the physical characteristics of the park meaning park owners will, in the long term, be faced with less costs as facilitates are continued improved as opposed to major one off costs. The park is also likely to increase in value as the quality of services improves. Local authorities will benefit from the new Standards and guidance in that they will provide greater clarity as to what is required. This will allow less time visiting parks on issues. The local authority Licensing of Park Home Estates Report 2001 stated that park homes took account of 20% of a Full Time Equivalent (FTE)\(^{13}\). The issuing of the guidance will allow this to reduce to 10% of FTE we estimate, as the queries will be able to be quickly and effectively dealt with. It will also save local authorities the £15,000 cost to individually update the Standards outlined above.

Economic costs will arise once parks are issued with updated licences to take into account the new Model Standards. There may be some costs arising from bringing some park facilities up to the new Standards, however, we believe that this will not have a significant impact, and costs will be negligible. These have been discussed throughout the consultation and overall the financial cost is less than under the current system for both park owners and local authorities.

There will be costs to local authorities arising from the possible need to issue new site licences to take account of changes to the Model Standards. However, we believe that any costs would not be significant and in most cases any new licences could be issued at the time of any review of a site licence. As these costs will arise any way we have suggested this is cost neutral. In reality they will be less than the £15,000 quoted under the do nothing option as less negotiation on conditions will be needed between parks and local authorities. This will also result in lower costs to park owners with close to nothing as model standard terms should be agreed. Again this saves the park owner money.

The direction change in cost of each option is shown in the table below. The added benefit of guidance has been taken into account for all groups.

---

\(^{13}\) Local Authority Licensing of Park Home Estates Report 2000 p.20
21. Environmental

The benefits of the proposed change are a greater awareness of the impact the park has on the surrounding area. The addition of flood risk highlights an increasing environmental awareness in this sector.

There are no environmental costs to these proposals.

22. Social

The proposed changes will have a social benefit with parks becoming safer places to reside as they will be easier to monitor with the guidance. Also a greater understanding of park home lifestyle will occur. It will be easier to identify park homes as quality housing choice.

There are no significant social costs attributable to the proposed changes.

Small Firms’ Impact Test (SFIT)

23. Most of the businesses affected by these proposals are small in nature. We do not feel that there will be any significant impact on them in the short term. As part of our policy development we have spoken to trade associations who represent small business and they agree that the proposals will not have a negative impact on their members. Indeed, we believe in the long term that the proposals will be beneficial. We have consulted the Small Business Service who concur with our assessment.
Competition Assessment

24. There are no competition issues arising from this consultation.

Enforcement, Sanctions and Monitoring

Enforcement

25. None, enforcement of the new Standards will be identical to the 1989 Standards. As they are best practice, they will continue to be enforced by the local authority through the site licence.

Sanctions

26. None. Local authorities just have to have regard to them.

Monitoring and review

27. Monitoring will take place via communications with local authorities, trade and residents associations. Contact will also come via the 3 All Party Parliamentary Group for the Welfare of Park Home Owners meetings per year.
Annex D

Diagram for measurement of separation gap

DRIP RAIL

Separation Distance

6m min

5m min

(Separation Zone)

6.8m max (external wall)