



Caravan park fire safety requirements

Summary

This practice note provides advice on the fire safety regulations for caravan parks in Victoria, specifically regulations 20 and 21 of the Residential Tenancies (Caravan Parks and Movable Dwellings Registration and Standards) Regulations 2010. It explains the regulations and the administrative and enforcement arrangements. It is intended for use by caravan park owners, councils and other stakeholders including the fire authorities.

Background

The Residential Tenancies (Caravan Parks and Movable Dwellings Registration and Standards) Regulations 2010 (the regulations) came into effect on 27 June 2010. The regulations updated the fire safety regulatory requirements for caravan parks.

They incorporate the Country Fire Authority (CFA) Caravan Park Fire Safety Guideline (the CFA Guideline) for the technical specifications and methods for achieving compliance.

The CFA Caravan Park Fire Safety Guideline

The CFA Guideline sets out objectives for fire safety in caravan parks. Through the Performance Measures it sets out a flexible method for meeting these objectives by providing fire safety measures which are appropriate to the assessed fire risks facing the caravan park.

The CFA has developed a set of design solutions, the Prescriptive Provisions, which can be applied to any caravan park. The Prescriptive Provisions set out details of fire equipment and maintenance standards which can be used to meet the requirements.

It is for a caravan park owner to elect which approach to use for their caravan park, either the Performance Measures or the Prescriptive Provisions, to achieve compliance with the requirements and therefore comply with the regulations.

For the specific technical specifications please refer to the CFA Caravan Park Fire Safety Guideline, available at www.cfa.vic.gov.au.



Regulatory requirements

Fire safety in caravan parks is regulated by regulations 20 and 21 of the regulations

Regulation 20 Fire Prevention and Safety – equipment

What does the regulation do?

Regulation 20 places an obligation on a caravan park owner to provide and maintain fire fighting equipment for the caravan park in accordance with Objective 3 and Performance Measures PM 4 and PM 5 or in accordance with Prescriptive Provisions PP 3 and PP 4 of the CFA Guideline.

Equipment will enable people in the park to fight a fire initially, and must be provided and maintained so the fire authority can fight a fire as necessary.

The requirements cover fire equipment for movable dwellings, such as fire extinguishers and fire blankets as well as smoke alarms. They also cover larger infrastructure for the park itself such as water tanks, fire hydrants and hose reels.

How does it apply?

Regulation 20 specifies that for a new park, or a new site in an existing park, a caravan park owner must comply with the requirements before the park or site is used for the first time.

For existing parks, if the fire equipment which is currently provided is not appropriate to the assessed risk and the likely fire service response for the park, then additional works will be required. Compliance with regulation 20 requires a caravan park owner to agree to upgrade or install additional equipment over a specified timeframe. The agreement, in the form of a written schedule of works will be between the caravan park owner and the relevant local council.

Regulation 21 Fire Prevention and Safety – access and separation

What does the regulation do?

Regulation 21 places an obligation on a caravan park owner to provide and maintain distance between UMDs, rigid annexes, caravan sites and other structures in the caravan park in accordance with Objectives O1 and O2 and Performance Measures PM 1, PM 2 and PM 3 or in accordance with Prescriptive Provisions PP 1 and PP 2 of the CFA Guideline.

The requirements in the CFA Guideline specify that access must be provided and maintained so that fire fighters are able to move between dwellings and carry out fire fighting activities while wearing protective clothing and breathing apparatus. They also set out requirements for access to the caravan park by fire vehicles.

To reduce the likelihood of fire spread between dwellings the CFA Guideline requires that clearance between and around dwellings is provided and maintained.

How does it apply?

Regulation 21 specifies that for a new park, or a new site in an existing park, a caravan park owner must comply with the requirements before the park or site is used for the first time.

For existing sites and dwellings in an established caravan park, a caravan park owner must maintain the existing separation distance between and around the dwelling.

Where a new dwelling is to be installed on an existing site the separation distances for the new dwelling must at a minimum be the same as were in place for the previous dwelling. This includes when a UMD or rigid annexe is altered following installation, for example, through the addition of a deck or verandah.

Enforcement of Compliance

Enforcement of compliance with the fire safety regulations is the responsibility of the relevant local council. It is done using the written report of the relevant fire authority. The regulations require the report of the relevant fire authority to be considered by the council when determining compliance.

Compliance will be assessed as part of the registration process. However, a caravan park owner has an obligation to ensure compliance with the regulations at all times and councils have the power to enforce the regulations at any time throughout the registration period. The fire authority may inspect a park at the request of the park owner or the council, and will generally inspect a park on a cyclical basis.



If the report of the fire authority states that a caravan park does not, at the time of inspection, comply with one or more of the requirements of regulation 20, the caravan park owner may enter into a written agreement with the local council (a schedule of works) to undertake the necessary upgrade works over time. An agreed schedule of works enables a caravan park to comply with the regulations for the purposes of registration.

The role of the fire authority (CFA or MFB)

The role of the relevant fire authority is to inspect and audit the fire safety measures in a caravan park and provide a report to the caravan park owner and the relevant local council.

The fire authority's role is to assess whether or not the caravan park meets the requirements set out in the CFA Guideline. The process will vary depending on whether the caravan park owner has elected to use the Performance Measures or the Prescriptive Provisions to meet the objectives.

In order to assess the caravan park the fire authority will need to see evidence that the equipment provided, or planned to be provided, is appropriate to the assessed fire risk facing the park and the likely fire service response.

If the caravan park owner elects to utilise the Performance Measures to meet the requirements of the CFA Guideline then the fire authority also has a role in assisting the caravan park owner in assessing the fire risk facing the park and to understand the likely fire service response to a fire in the caravan park.

The fire service's role is also to assess alternative design proposals if a park owner is using the Performance Measures. The decision as to whether or not the fire equipment provided is adequate will ultimately lie with the fire service.

Note: *It is not the role of the fire service to provide design advice to a caravan park owner and the CFA is not able to design the fire safety equipment solution to meet the Performance Measures.*

Independent advice

If a caravan park owner is relying on the Performance Measures to meet the requirements of the CFA Guideline, he or she may seek the independent advice of a fire engineer or fire safety expert to assist in understanding the fire risk facing the park and/or in developing alternative design proposals.

Appeals

If a caravan park owner does not agree with a decision made by a council in relation to compliance he or she may appeal the decision to the Building Appeals Board. The Building Appeals Board (BAB) is an independent statutory body established under the Building Act 1993. Appeals are heard by a panel of building experts and legal representation is not required. Determinations can be made to waive, modify or vary the provisions of particular regulations based upon the specific case. An application fee is payable for an appeal. For more information including on the fee payable, see the building commission website www.buildingcommission.com.au or contact the Registrar on 1300 815 127.

This practice note has been developed with the assistance of the Victorian Caravan Parks Association, the Country Fire Authority and the Municipal Association of Victoria.

ISBN 978-1-921940-12-5

Published by the Victorian Government Department of Planning and Community Development Melbourne, September 2011.

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