PE1962/G: Stop motorhomes parking overnight out with formal campsites, caravan parks and Aires

Petitioner written submission, 23 September 2024

Recent events have highlighted several inconsistencies and loopholes in caravan park law and the whole system of regulating and licencing of caravan parks.

Firstly, it seems that car parks where motorhomes "park overnight" do not have to be licenced or follow the Scottish Government's guidance '**Fire safety - existing premises with sleeping accommodation: practical guidance**' – particularly carparks operated by the local authority.

The rules on Fire Safety seem to have been blurred recently and we believe that clarification is required.

The Scottish Fire and rescue Service are recommending **6m spacing** between units.

The Caravan and Motorhome Professional Association (CAMPA) are recommending **4m Spacing**.

The Campaign for Real Aires (CAMPrA) are recommending **3m spacing**.

Forestry and Land Scotland (FLS) Stay the Night scheme require motorhomes to be **4m apart.**

Scottish Canals Motorhome Transit Stopovers require motorhomes to be **3m** apart.

A recent FOI request to FLS also revealed that they do not have specific fire risk assessments for their Stay the Night locations.

Currently any motorhome parking outwith a regulated space can do what they like.

Fire Safety guidance needs to be made clear and needs to be standardised so that it is the same for everyone.

We recognise that motorhome fires are rare, however they do happen. Motorhomes use gas for cooking and heating as well as petrol/diesel for transport. These substances can explode – the spacing requirement is in place so that any fire does not spread from one unit to another. Also if people are sleeping at the time when this happens their reaction times will be slower – hence the specific guidance for sleeping accommodation.

Fire Safety is very important, but such places should have adequate facilities to deal with the rubbish that these motorhomes produce, they should also all have facilities to deal with wastewater and chemical toilets in order to stop people from disposing of waste in inappropriate places.

As Campsite owners we are looking for level playing field competition. We want the same health and safety rules applied to these "overnight motorhome parking" facilities, that we have to abide by, and we also want to see them run on a commercial basis so that they are not undercutting us on price – it costs a lot of money to host motorhomes and those outside the industry are unaware of the huge costs involved.

Finally, legislation surrounding motorhome parking needs to be looked at properly. It is becoming apparent that the current legislation covering caravan sites is out of date and needs to be reviewed to include this new phenomenon of overnight motorhome parking. We would like to see all locations that offer overnight motorhome parking required to be licenced like caravan parks and we would like to see that applied to all such locations like car parks and laybys. We also need to see the rules enforced.