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Your Ref: GS/SM/LETS/15650

Date

Mr G. Somerville  
Group Commander (Protection)  
NIFRS Headquarters  
1 Seymour Street  
Lisburn  
BT27 4SX

Dear Commander Somerville

**Re: Consultation – Draft Fire Safety Guide for Caravan Site Operators**

Further to your letter of consultation (dated 11<sup>th</sup> June 2018) which relates to new draft fire safety guidance for caravan site operators that provides information on compliance with fire safety law in Northern Ireland, I wish to make the following comments on behalf of Mid Ulster District Council.

Council note that the draft guidance produced by the Northern Ireland Fire and Rescue Service (NIFRS) to assist the operators of caravan sites is substantially reflective of information contained within the existing Model Licence Conditions for Caravan Sites 1992 and Model Licence Conditions for Residential Caravan Sites 1994. Caravan site licences issued by legacy Councils under the Caravans Act (Northern Ireland) 1963 prior to the formation of Mid Ulster District Council in 2015 incorporate these model conditions.

Mid Ulster District Council welcomes the new draft guidance as it provides an opportunity to update site operators on amendments to fire safety requirements enforced by NIFRS following the issue of their caravan site licence, particularly in respect of fire safety risk assessment. Likewise, the section updating the relevant British Standards and UKLPA Codes of Practice relating to storage of gas is helpful, as is the guidance on the use of BBQs at caravan sites and smoke / carbon monoxide monitoring.

The design guidance on turning circles for fire appliances and technical specification for fire hydrant water supply will also ensure that any prospective site operations are provided with relevant specifications at an early stage of site design.

One concern however that Council does wish to raise is the fact that NIFRS placed a limitation on the guidance by excluding its applicability to “*caravan sites which are occupied by gypsies, travellers or which house agricultural workers*”. This exclusion seems unusual following the recent publication of the Northern Ireland Human Rights Commission report “*Out of Sight, Out of Mind: Travellers Accommodation in Northern Ireland*” in March 2018, which recommended that local Councils and statutory agencies take steps to ensure that traveller sites are licenced when required. It would be appreciated if the rationale for this limitation could be clarified or if further guidance relating specifically to the excluded groups could be provided.

Yours sincerely