

Guidance Note GN17

Fire detection and fire alarm systems in holiday caravans and park homes

This guidance note, which is written primarily for holiday caravan and park home manufacturers, supersedes all previous NCC guidance on fire detection and fire alarm systems in holiday caravans and park homes.

Holiday caravans (manufactured in accordance with BS EN 1647 – and park homes in the form of leisure lodges (manufactured in accordance with BS 3632) – used for holiday letting purposes fall under the scope of fire safety legislation.

Park homes (manufactured in accordance with BS 3632) used for residential purposes fall under the scope of BS 5839-6 Code of practice for the design, installation, commissioning and maintenance of fire detection and fire alarm systems in domestic premises.

Fire safety legislation

Holiday caravan and park home parks are subject to fire safety legislation up to the point where the public highway is reached. However, holiday caravans and park homes (including any private garden associated with them) which are owned or leased by individuals for their own use, either as a holiday home or as their primary residential dwelling, are private premises and, as such, fall outside the scope of the fire safety legislation.

Nevertheless, if a holiday caravan or park home is used for holiday letting purposes, it is considered to fall within the scope of fire safety legislation.

Where any holiday caravan or park home is subject to fire safety legislation, the relevant legislation is:

- the Regulatory Reform (Fire Safety) Order 2005 (England & Wales);
- the Fire (Scotland) Act 2005 (Scotland); or
- the Fire and Rescue Services (Northern Ireland) Order 2006 (Northern Ireland).

Where the above fire safety legislation applies, a fire safety risk assessment must be carried out by the owner, and this should consider the fire detection and fire alarm system. The fire safety risk assessment *may* deem that a superior system is appropriate.

Caravan accommodation

Fire safety legislation applies to buildings as well as holiday caravans and park homes used for holiday letting purposes (which fall under the statutory definition of a caravan), and so there can be no defined solution to fit all possible scenarios. Yet, in comparison to buildings, a 'caravan' is naturally an uncomplicated, relatively small unit of accommodation:

- the maximum dimensions and number of sections of a caravan are restricted (maximum 20m x 6.8m in no more than 2 sections);
- the accommodation is on a single ground storey;
- there is a robust fire egress philosophy from all habitable compartments; and
- a caravan is a self-contained, detached unit for one household with a significant separation distance between it and neighbouring units.

The requirement

Through the caravan industry Holiday Caravan and Park Home Technical Panel, the National Caravan Council (NCC), in collaboration with the Fire Industry Association (FIA), have prepared this guidance note (GN17) to give guidance on what fire detection and fire alarm system should be installed in all holiday caravans and park homes.

Because the final use of a holiday caravan or park home may not be known at the point of manufacture, or may change, the NCC has taken a pragmatic view about what system should be installed. Therefore, under the NCC's Manufacturer Approval Scheme, the requirements for the grade and category in all holiday caravans and park homes is as follows:

Grade D1, category LD2.

Implementation: All products manufactured from 1st September 2022.

Note: Manufacturers may implement this requirement sooner.

For NCC member manufacturers, this requirement shall be considered mandatory. For non-member manufacturers, it is recommended that this guidance is followed to address uncertainty of final use.

System design

The design is determined by considering the **grade** of the fire detector, and the **category** of the system.

NOTE: BS 5839-6 is a good guide to understanding grade and category.

Detector grade

Grade	Requirement
D1	A system of one or more mains-powered detectors each with tamper-proof standby supply consisting of a battery or batteries.
Where more than one detector is installed, they shall be interlinked.	

System category

Category	Requirement
LD2	A system incorporating detectors in all circulation areas that form part of the escape routes from the premises, and in all specified rooms or areas that present a high fire risk to occupants, including any kitchen and the principal habitable room.

System content

The system shall incorporate at least one smoke detector and the following requirements shall also be met:

- a smoke detector in the hallway (within 3m of bedroom doors);
- a heat detector in the kitchen; and
- a smoke detector in the lounge – unless the lounge is open-plan to the kitchen and covered by a heat detector.

NOTE: Smoke detectors shall conform with BS EN 14604 and heat detectors shall conform with BS 5446-2.

Other considerations

As with all clauses within caravan habitation standards:

- this guidance is not intended to be the target in all circumstances, but it indicates the minimum level for health and safety for occupants; and
- each caravan manufacturer must decide if they will meet or exceed this guidance.

NOTE: For example, in an LD2 system, additional smoke alarms may be required if bedrooms are located at each end of the caravan (centre lounge).

If the caravan manufacturer's customer has conducted a fire safety risk assessment and a superior system has been deemed appropriate, the caravan manufacturer's customer who conducted the fire safety risk assessment should inform the caravan manufacturer at the time of placing the order.

NOTE: It is not always possible to upgrade a system in a pre-manufactured caravan.

Useful sources of information

NOTE: This is not a definitive list and nor does it represent the requirements.

ENGLAND & WALES

The UK government has provided guidance which can be found here:

<https://www.gov.uk/government/publications/do-you-have-paying-guests>

NOTE: This guidance is in the course of revision and a new version will be published by the Home Office.

<https://www.gov.uk/government/publications/fire-safety-risk-assessment-sleeping-accommodation>

SCOTLAND

The Scottish government has provided guidance which can be found here:

<https://www.gov.scot/publications/practical-fire-safety-guidance-existing-premises-sleeping-accommodation/>

NORTHERN IRELAND

The Northern Ireland government has provided guidance which can be found here:

<https://www.nifrs.org/wp-content/uploads/2021/02/Sleeping-Accommodation.pdf>

End notes

This guidance note and links to useful sources of information should not be used to design a fire detection and fire alarm system. They are an aid to highlight the need to properly consider what system is appropriate. The system content identified in this guidance should be improved to a superior system if deemed appropriate by a fire safety risk assessment.

ACKNOWLEDGEMENT: The National Caravan Council is grateful to the Fire Industry Association for advice during the drafting of this guidance note and their endorsement of it.