

## **MINIMUM STANDARDS CARAVAN AND CAMPING PARKS QUESTIONS AND ANSWERS**

### **Why were the Minimum Standards developed?**

The 'Twelve Month and Seasonal Permit Minimum Safety and Appearance Standards' were prepared to replace the previous '30-year rule' which required caravans older than 30 years on Twelve Month Permit (TMP) and Seasonal Permit sites to be removed from the parks. The Great Ocean Road Coast and Parks Authority (the Authority) committed to reviewing this rule following feedback from campers that they felt it was unfair.

The introduction of the Minimum Standards now means vans of any age can remain in the parks, if they are in a suitable standard in terms of safety and appearance (i.e., they meet the Minimum Standards).

### **Who do the Minimum Standards apply to?**

The Minimum Standards apply to all TMP and Seasonal Permit sites in the Authority managed caravan and camping parks.

### **Who is responsible for ensuring sites comply with the Minimum Standards?**

It is the Permit Holder's responsibility to ensure their site, van and annex comply with the Minimum Standards.

### **How have the Minimum Standards changed since the first version that was released for consultation?**

It is considered that the final version of the Minimum Standards largely reflects the previous draft version that was released for consultation with campers in 2014. Only relatively minor changes have been made to the document since that time, including due to the general support expressed for the draft Minimum Standards during the 2014 consultation process. These changes include the removal of some standards that were redundant or considered to replicate other standards (e.g., the requirement for vans to be movable in 24 hours, while still relevant, is considered will be met if the other requirements for vans to be structurally sound, etc are met). These changes were made in response to the feedback received from campers on the draft version of the document and to make it as simple as possible.

A key change to the Minimum Standards process is that the first round of checks (that will include all vans on TMP and Seasonal Permit sites greater than 15 years old) to ensure compliance with the Minimum Standards are now planned to be completed in late 2021. This is 12 months later than originally planned and is intended to allow permit holders sufficient time to ensure their sites, vans and annexes will comply with the Minimum Standards before the first round of checks is completed.

### **Check process.**

#### **Who pays for the checks to be completed?**

The cost of completing the check, which mainly comprises the cost for the assessor's time, will be paid for by the Authority. This excludes the checks completed on vans being brought into the parks to occupy a TMP or Seasonal site for the first time – the permit holder will be responsible for the cost of completing this check. The permit holder is responsible for any costs associated with ensuring their site, van and annex is compliant with the Minimum Standards.

#### **Will checks be done when permit holders are on site?**

It is preferred to have the permit holder, or their representative, present for the check. However, if this is not possible, the permit holder will need to arrange access to the van and annex for the Assessor (e.g., leave a key at the park office).

**Where will the check information be filed?**

It is planned to use an electronic system for all the information and documents required for the Minimum Standards and checking process. For example, the current hard copy Minimum Standards report form will be converted to an electronic template which the assessor completes using a tablet device (e.g., iPad) during the checking process. The completed report form will then be emailed to the permit holder. A copy will also be kept at the park office in the relevant TMP file.

**If a 'non-compliance' with any of the Minimum Standards is identified during a check and corrective action is required, who then confirms that this action has been taken and the site is now fully compliant?**

It is the responsibility of the permit holder to provide suitable evidence within the required timeframe (see below) to the park representative that any required corrective actions have been completed. This could be in the form of photos, documentation (e.g., 'Electrical Safety Check' receipt) or a follow up site check. If suitable evidence shows the non-compliance has been rectified, this will be kept on file with the check report and then the park representative will confirm that the site is now compliant, and the check process is complete.

**What is the appeals process if there is a disagreement with the assessor as part of the check process?**

The final Minimum Standards are intended to be clear and unambiguous so that anyone can understand them and what is required to ensure compliance with them. The assessor's role is to then be an independent, unbiased professional who checks that sites are compliant. While it is expected that this approach will minimise any disagreements with an assessor's check and report, if a disagreement does arise it can be raised and discussed during the check process amongst the people present (i.e., assessor, permit holder, park representative).

**Who will complete the checks?**

The checks will be completed by the assessor, in the presence of the park representative and permit holder, if available. The assessor's role is still to be confirmed; however, it will be someone with relevant skills and experience (e.g., caravan repairer)

**Timing**

**If work needs to be completed to ensure a site complies with the Minimum Standards, what is the timeframe to complete these works?**

All TMP and Seasonal permit sites will need to comply with the Minimum Standards. It is the responsibility of the permit holder to ensure their van, annexe and site are maintained in an appropriate way and any necessary repair or maintenance work is undertaken to ensure they comply with the Minimum Standards.

If a non-compliance with any part of the Minimum Standards is discovered (e.g., during a check process), it is planned to allow the permit holder one month to undertake any necessary work to rectify the non-compliance (a longer period will be allowed to rectify any non-compliances identified during the initial round of checks in October – November 2021). However, there may be some occasions where a shorter time frame is required to rectify the non-compliance (e.g., an inappropriate extension lead is being used to connect the van and annexe to the power head).

### **What are the 'Electrical Safety Check' and 'Gas Safety Check'?**

These checks will be completed by appropriately qualified people (i.e., electrician and gas fitter, respectively) to confirm that a van and annexe comply with relevant standards (i.e., ASNZS-5601.2-2013 and ASNZS-3001-2008). After completing the check and confirming compliance with the standard, the qualified person will provide the permit holder with a receipt to confirm they have checked the van and annexe and it complies with the standard. The Authority is investigating the development and use of a standard template for these receipts.

### **Who is going to complete the 'Electrical Safety Check' and 'Gas Safety Check' and at whose cost?**

While the park will help arrange the initial inspections by bringing trades onsite, for future inspections it is the responsibility of each permit holder to engage suitably qualified persons (i.e., electrician, gas fitter) to complete the checks and provide the receipts for their van and annex at the required intervals (e.g., every 3 years if a Seasonal site and every 5 years if a TMP site). Permit holders will be responsible for any costs associated with ensuring their van and annex achieves the standards and obtaining the receipts beyond the initial checks.

### **How much will the checks and receipts cost?**

There will be no set cost associated with the checks or receipts. Permit holders will be able to engage any person they like to complete the checks and provide the receipts if they have the appropriate qualifications. As an indication, a Torquay electrician who has participated in the development of the Minimum Standards has advised that they would complete the Electrical Safety Check and issue a receipt for approx. \$80 per site.

### **Do permit holders need to provide the electrical and gas check receipts to anyone?**

Copies of the receipts will need to be provided as part of the checking process for the 'Minimum Standards' to demonstrate their currency. Copies may also need to be provided to park management at other times for the same purpose.

### **Moveability**

**Why do vans need to have wheels, draw bar, etc, attached? Vans can be moved in other ways (e.g., back of a truck) that still ensure they comply with the 'moveable in 24 hours' requirement of the *Residential Tenancies Act 1997*.**

While also potentially being of use if a situation arose where a van needed to be moved quickly (e.g., to move it away from a fire in the park), requiring vans to have wheels, drawbars, etc, helps maintain caravans in the park looking and feeling like caravans, and therefore helps the parks continuing to look and feel like caravan parks.

It is acknowledged that a small number of existing caravans in the parks do not currently have wheels, drawbars, etc, and these will not be required to comply with this part of the Minimum Standards. This is because the owners of these caravans may have been allowed to remove these items by park managers in the past and it would not be fair to now require the owners to reinstate them. Caravans being brought into the parks for the first time, as well as all other existing caravans which have these components now in the parks, need to comply with this standard. This is acknowledged in a footnote in the relevant part (i.e., page 4) of the Minimum Standards.

### **What is the basis for the requirement for vans to be parked with the draw bar facing the nearest road?**



Having vans parked with their drawbars facing the nearest road allows them to potentially be moved more easily and quickly if the need arises (e.g., to move them away from a fire in the park). It also helps provide for an orderly layout of sites and the park.

**What is 'significant rust'? (Minimum Standard 4a)**

It is recognised that some amount of rust in caravans and annexes would not detrimentally affect their safety and appearance and that it is very hard to avoid when they are located on the coast. However, there is also a point at which the amount of rust becomes 'significant' and does affect the safety and appearance of the caravans. This would include if it covered a significantly sized area, is likely to be affecting or threatening to affect the structural integrity of the van or annex or is obviously visible from neighbouring sites. Part E: Photo Examples in the Minimum Standards is intended to help illustrate what is meant by 'significant rust'.

**Things like 'faded/worn paint' can be subjective – how will these be assessed?**

Similarly, to 'significant rust' above. It is not expected that all vans and annexes be freshly painted, but there comes a point where the painted surfaces have deteriorated to the stage where it impacts the appearance of the van/annex and the park. Part E: Photo Examples in the Minimum Standards also illustrates what is meant by 'faded/worn paint'.

**Will the Minimum Standards apply to all caravans in the parks?**

The main intention of the Minimum Standards is to ensure all TMP, and Seasonal permit sites meet basic standards regarding their appearance and safety. Therefore, the Minimum Standards will apply to all TMP and Seasonal sites in the parks, irrespective of the age of the caravans and annexes on them. It could be expected that relatively new vans and annexes will comply with the Minimum Standards given their age and inherent condition, and therefore vans and annexes under 15 years old will not be subject to the checking process, however they must comply with the Minimum Standards.

**Why does the smoke detector in a van need to be connected to mains power? How will it work if the van is switched off or disconnected from the power head?**

The *Residential Tenancies (Caravan Parks and Movable Dwellings Registration and Standards) Regulations 2010* requires that smoke alarms be fitted to all caravans and that they be connected to mains power if it is supplied to the site. The smoke detector also needs to have a battery back-up power supply in case the mains power supply is not available for any reason.

**Can park management provide the details of suitable repairers/tradesman to undertake work on caravans and annexes if it is required?**

It is planned to have a list of repairers and tradesman who could undertake work on caravans and annexes in the Authority managed parks available at park reception for interested park users. This could include, for example, the contracted electrician who undertakes all electrical work in the park and is therefore very familiar with it. These repairers and tradesmen would not be recommended or 'endorsed' by the park management or the Authority in any official way. Rather, the list is only intended to assist park guests in finding potentially suitable service providers to undertake work on their caravans and annexes. It is up to the park guest to contact and assess if the service provider meets their requirements and then arrange with them to complete the works.