

FOI Request to DfT re Motor Caravan Cooking Facilities 2018-04-15

https://www.whatdotheyknow.com/request/motor_caravans_minimum_requireme

Freedom of Information request - Motor Caravans - Minimum Requirement of a 2 ring cooking facility or microwave

Dear Department for Transport,

EU Directive 2007/46/EC, a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles, states in Paragraph 5.1:

5.1. 'Motor Caravan' means a special purpose M category vehicle constructed to include living accommodation which contains at least the following equipment:

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seats and table,

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sleeping accommodation which may be converted from the seats,

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cooking facilities, and

—

storage facilities.

This equipment shall be rigidly fixed to the living compartment; however, the table may be designed to be easily removable.

The DfT Guidance "Converting a vehicle into a motorhome" Updated 22 April 2016, includes the following guidance:

"If you have converted a van into a motor caravan then you must return the V5C to DVLA for body type amendment"

"Cooking facilities must:

- be an integral part of the vehicle living accommodation and mounted independently of other items
- be secured to the vehicle floor and / or side wall
- be secured as a permanent feature - bolted, riveted, screwed, or welded
- consist of a minimum of a 2 ring cooking facility or a microwave in either case having a fuel / power source

If the cooking facility is fuelled by gas having a remote fuel supply:

- the fuel supply pipe must be permanently secured to the vehicle structure
- the fuel reservoir must be secured in a storage cupboard or the reservoir secured to the vehicle structure."

"Legal information

The information in this document is a summary of the department's understanding of what the law requires. However, ultimately the interpretation of the law is a matter for the courts based on individual facts of any particular case. You are therefore advised to consult the relevant legislation and, if necessary, seek independent advice."

I have used a small campervan (professionally customised Fiat Scudo Combi) with a two-ring cooking facility and no microwave for over five years and have never found it necessary to use more than one ring.

The DfT guidance cannot be related to having "spare capacity", ie. in case one ring is defective, as the alternative provision is a single microwave.

Unless there is some other legislation that has a bearing on this matter, I feel that the minimum requirement of a 2 ring cooking facility, as interpreted by the DfT, represents redundant over-provision of cooking facilities.

I would therefore be grateful if you could clarify why the DfT understands that "the law requires" a minimum of a 2 ring cooking

facility, ie. rather than a one-ring cooking facility.

If there is no other legal requirement that impacts on this matter, I would be grateful if you could advise me whether the DfT would be willing to reconsider the current guidance?

Yours faithfully,

Liz Panton



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Date: 23 April 2018

Ms Liz Panton
request-477858-c818c95@whatdotheynow.com

Dear Ms Panton

Re: Motor caravans – Minimum Requirement of cooking facilities

Thank you for your email of 15 April to Department for Transport (DfT) Freedom of Information Team, which has been passed to the Driver and Vehicle Licensing Agency (DVLA) to respond.

The guidance you refer to is not prescribed in law but has been established, by the Department for Transport, to assist motorists when they carry out “do it yourself” conversions of their motor vehicles into “camper vans”/ “motor homes”.

The importance of the guidance, particularly in relation to incorporating fitments to a vehicle, is for safety not to be compromised but, there would be no concern if the cooker comprised of either one or two rings and it has been fitted correctly.

The register maintained by DVLA is based on vehicles and their keepers. The register is essentially maintained to assist with road safety, revenue collection, and law enforcement, i.e. the person responsible for their day to day use and licensing on the public roads. For these reasons therefore, DVLA is concerned that they are being informed about changes as and when they occur, but in particular when the vehicle’s body type and/or its outward appearance is changed.

Yours sincerely,

Sent unsigned.

Vehicle Policy Group
Strategy, Policy and Communications Directorate