

1.- CONCEPT

Motorhomes are ordinary registered motor vehicles whose characteristics are detailed in Annex II of the General Vehicle Regulations, approved by Royal Decree 2822/1998, of December 23, which defines a motorhome as *“a vehicle built for a special purpose, including living accommodation and containing, at least, the following equipment: seats and table, beds or bunk beds that can be converted into seats, kitchen and cupboards or similar. This equipment will be rigidly fixed to the living compartment. The seats and table can be designed to be easily dismantled.”*

Motorhomes are built on the chassis of commercial vehicles commonly used for the manufacture of vans and light trucks, their length usually ranges between 5.50 m. and 8.00 m., their average height is around 3.00 m. and

Their maximum authorised weight is very often 3,500 kg and in some cases higher, construction characteristics that have nothing to do with an average passenger car and that affect its manoeuvrability, braking distance, behaviour when turning, etc.

Motorhomes will have a classification based on construction criteria on their ITV card, which will generally correspond to one of these two numbers: " 32-

Motorhome MMA ≤ 3,500” or “33- Motorhome MMA > 3,500 kg”. In certain cases, they may also be associated with the figures: “24 Van/ Van MMA ≤ 3,500 kg” or “31- Adaptable mixed vehicle”.

2.- SPEEDS

2.1 – Maximum speeds outside of towns

Article 48 of the General Traffic Regulations, approved by Royal Decree 1428/2003, of November 21, regulates maximum speeds on roads outside built-up areas.

Regarding motorhomes, the following limits stand out, among other regulations:

	Motorhomes with a maximum authorized mass equal to or less than 3,500 kg	Motorhomes with maximum authorized mass over 3,500 kg
Highway and dual carriageway	120	90
Conventional	90	80

Violations of the rules contained in said article are considered serious or very serious, depending on the speed limit.



It is pertinent to point out for information purposes that users of motorhomes, as well as other vehicles, will act in accordance with Law 22/1988, of July 28, on Coasts, whose purpose is the determination, protection, use and policing of the maritime-terrestrial public domain and especially the seashore. In the event of committing any of the following serious violations of said law, according to its article 97, they are sanctioned with these fines:

- In the case of camping, 40 euros per square metre occupied per day, this being the minimum fine.

- In the case of unauthorized parking or circulation of vehicles, between 50 and 150 euros, depending on the criteria established by regulation.

4.- USE OF SEAT BELTS AND RESTRAINT DEVICES

In accordance with article 117 of the General Traffic Regulations, the driver and passengers of motorhomes must use seat belts or other duly approved restraint systems, correctly fastened, both when driving on urban and interurban roads. This obligation, as regards seat belts, will not be enforceable in those vehicles that do not have them installed.

Regarding child restraint systems, minors with a height of 135 centimetres or less must use them and be placed in the vehicle according to the following criteria:

- Child restraint systems must be approved and properly adapted to the child's height and weight.

- These minors must be placed in the back seats.

- Exceptionally, they may occupy the front seat, provided they use approved child restraint systems appropriate to their height and weight, in the following cases: 1. When the vehicle does not have rear seats. 2. When all the rear seats are already occupied by children measuring 135 centimetres or less. 3. When it is not possible to install all the child restraint systems in said seats. If they occupy the front seats and the vehicle has a front airbag, they may only use rear-facing restraint systems if the airbag has been deactivated.

- Failure to use seat belts and other approved child restraint systems, or using them inappropriately, will be considered a serious offence.



- The regulations set out completely exclude the possibility of occupying the beds or bunks of a motorhome in circulation, given the obvious risk to its occupants in the event of sudden braking, overturning or collision. However, seats equipped with approved restraint systems may be occupied, using said systems, provided that the number of people travelling in the vehicle, both in the cabin and in the living area, does not exceed the legally authorised seats stated in the documentation of said vehicle.

5.- EQUIPMENT

As for the accessories, spare parts and tools that motorhomes must carry, they will be, in accordance with Annex XII of the General Regulations of Vehicles, the following:

- The **V-16 danger pre-signalling device** to be placed at the highest possible point of the immobilised vehicle, ensuring its maximum visibility. There are V-16 signs on the market with a magnetic base that facilitate their placement on non-horizontal metallic surfaces of vehicles whose height does not allow their placement on the roof, thus ensuring maximum visibility. There are also signs that can be attached using a suction cup system or similar, suitable for placing the sign on non-metallic surfaces in these circumstances.

- A **high visibility reflective vest**, certified according to Royal Decree 1407/1992, of November 20, which regulates the conditions for the marketing and free circulation within the Community of personal protective equipment, which requires the CE marking.

- A **complete spare wheel or a temporary wheel**, with the necessary tools for changing wheels, or an alternative system to changing wheels that offers sufficient guarantees for the mobility of the vehicle. In these cases, the vehicle must be driven in compliance with the limitations of each alternative.

6.- TECHNICAL INSPECTION

In accordance with Royal Decree 920/2017, of October 23, which regulates the technical inspection of vehicles, the following inspection frequency applies, in general, to motorhomes:

- Seniority up to four years: exempt.

- More than four years old: biennial.

- More than ten years old: annual.



7.- RECEPTION OR CAMPING AREAS

These are facilities specifically designed to provide service or accommodation to motorhomes, providing a series of services necessary for these vehicles.

Regarding the reception areas, some regional regulations, such as that of Navarra, in this case for illustrative purposes, specify the minimum services and facilities that these areas must have:

- A clean point which will consist of a connection to the water network and a self-cleaning container or discharge pit.

- Phone.

- Drinking water source.

- Washbasins, showers, toilets and laundry rooms. In all cases, they will be provided with permanent hot water, sufficient lighting and effective cleaning services.

- An electrical supply power. At least one low voltage electrical connection will be made available to users so that they can recharge the batteries of the vehicle.

- Traveler control service for appropriate legal purposes and continuous surveillance service.

- First aid medical supplies in a visible place provided for this purpose.

7.1 – Regional regulations

Recent regional legislation is deepening the regulation of areas for the reception of motorhomes as a type of tourist accommodation. These regional regulations understand that at the present time it is necessary to satisfy the demand of new tourists who travel in motorhomes and similar, whose needs have become detached from those of the users of traditional tourist camps by taking advantage of the autonomy provided by the vehicle in which they travel and spend the night, thus generating a different type of tourism. Therefore, it is necessary to facilitate this tourism by regulating the reception areas for motorhomes, as well as differentiating between parking and camping for this type of vehicle.

Navarra regulates the reception and camping areas for motorhomes, through the Foral Decree 103/2014, of November 5, on the organization of reception areas and



motorhome camping. This Decree is in accordance with the interpretative criteria of this Instruction, as well as with the criteria of motorhome users, when they request its treatment as a private vehicle as long as it does not have a strictly physical external condition, and is treated as such and only regulated based on its size and condition, and not by its use.

Its art. 1 establishes that:

"2. The following are excluded from the scope of this regional decree: a) The stopping and parking of motorhomes and similar vehicles in areas designated for this purpose on roads, highways, urban roads and car parks. Any motorhome or similar vehicle stopped or parked in authorized areas of urban or interurban public roads, in accordance with traffic and vehicle circulation regulations, which does not exceed or expand its perimeter by transforming or deploying elements of the vehicle, is supported by its own wheels without using chocks and does not spill substances or waste onto the road, shall not be considered to be camping."

In the Autonomous Community of **Andalusia**, the development of the regulation regarding itinerant tourism is found in Decree 26/2018 of January 23, on the regulation of tourist camps. One of the aspects of improvement established by the current decree is to respond to the new accommodation formats in tourist camps, such as motorhome tourism. Specifically, the decree establishes a new group within the category of tourist accommodation in camps: overnight areas for motorhomes.

As with other regional regulations, Decree 26/2018 in its article 1, Point 4 leaves room for alternative behaviour of itinerant tourism in accordance with traffic regulations, according to which a vehicle-dwelling is not considered to be camping if it does not extend the space in any way, either in the form of sound or physical emissions, or interfere in any way with traffic or other urban aspects. It says:

"The following are excluded from the scope of application of this Decree and, therefore, may not use the terms "tourist camp", "campsite", "motorhome overnight area", or the names of specialities in Annex III of this Decree, in their name and advertising: Parking areas for motorhomes, caravans and campers on urban roads, which will be regulated by municipal ordinance, and on interurban roads, in accordance with the General Traffic Regulations, or any place reserved for parking for motorhomes regulated by their sectorial regulations."

In **Extremadura**, the use of motorhomes is regulated by Law 6/2018, of July 12, amending Law 2/2011, of January 31, on the development and modernization of motorhome tourism.

Extremadura, which adds to said law an article 66 bis entitled "*Motorhome areas*" which establishes:

"They are spaces of land intended exclusively for the accommodation of motorhomes or similar, duly delimited, equipped and conditioned, open to the public for their



temporary occupation, with the possibility of establishing a price, in the terms determined by regulation.”

In **Castilla-La Mancha**, the matter is regulated by Decree 94/2018, of December 18, which regulates the regulation of campsites and areas for motorhomes in Castilla-La Mancha, in which in its art. 3 it excludes from the application of the Decree, among others, in the following case:

“c) The stopping and parking of motorhomes and similar vehicles in the areas designated for this purpose on roads, highways, urban roads and parking lots, as well as similar areas designated by the City Councils.”

In **Catalonia**, through Decree 75/2020, of August 4, on tourism, like the Navarrese regulations, it also leaves room for the alternative behavior of itinerant tourism in accordance with the traffic regulations by which a vehicle-housing is not considered camping if it does not make any type of extension on the space, either in the form of sound or physical emissions, or interfere in any way with traffic or other urban aspects. Art. 213-22 provides that:

“A motorhome that is stopped or parked in designated areas of urban or interurban public roads, in accordance with traffic and vehicle circulation regulations, that does not exceed or expand its perimeter by transforming or deploying elements of the motorhome, is supported by its own wheels without using wedges, and does not spill substances or waste onto the road is considered not to be camping.”

In **Valencia**, the regulation is carried out through Decree 10/2021, of January 22, of the Consell, approving the Regulation governing tourist accommodation in the Valencian Community, in which the provisions of article 2, section 5, make it clear that the parking of motorhomes with or without the intention of staying overnight is excluded from the application of this Decree, since the parking of these vehicles is neither prohibited nor regulated, given that this issue is not the responsibility of tourism regulations.

In **Asturias**, Decree 61/2022, of September 23, on the Regulation of tourist camps and special areas for the reception of motorhomes in transit, which also takes into account the exclusion of application of this Decree when traffic regulations are applicable, as provided for in its art. 2.d):

“A motorhome is considered not to be camping if it is stopped or parked in authorized areas of urban and interurban public roads, in accordance with traffic and circulation regulations, when the only contact with the ground is through the wheels; it does not exceed or expand its perimeter by transforming or deploying elements of the motorhome, so that it does not occupy more space than that of the motorhome, there is no more



emissions and noise that may be emitted by the engine combustion and does not dump substances or waste onto the road.”

7.2 – Data communication

In compliance with Royal Decree 933/2021, of October 26, which establishes the documentary registration and information obligations of natural or legal persons who carry out lodging and motor vehicle rental activities, motorhome users are obliged to communicate the personal data determined by regulation, depending on whether they are lodging or vehicle rental activities, to the following natural or legal persons:

- Commercial accommodation establishments open to the public integrated into this sector in accordance with the regulations issued by the competent administration.
- Campsites and motorhome parking areas.
- Companies dedicated specifically to vehicle rental.
- Tour operators that provide intermediary services between companies dedicated to lodging or vehicle rental and consumers.
- Digital platforms dedicated, for a fee or free of charge, to intermediation in these activities via the Internet.

7.3 – Signage for service or reception areas

The Catalogue of Vertical Signs of the Ministry of Transport, Mobility and Urban Agenda includes the sign S-128 “Emptying point for caravans and motorhomes” which indicates a location where parking for motorhomes, vans and motorhomes is authorised and where the grey and black water tanks can be emptied, waste water can be emptied with sewerage services and a water intake.

8.- TRANSPORTATION OF AUXILIARY VEHICLES

It is very common for motorhomes to transport auxiliary vehicles, usually bicycles, a moped, a small-capacity motorcycle or a Personal Mobility Vehicle. This practice is authorised provided that a bicycle rack or other removable element intended for this purpose is used and, when it protrudes from the floor plan of the motorhome, the following requirements are met in accordance with the provisions of article 15 of the General Traffic Regulations:



- That it protrudes from the plan projection of the motorhome, at the rear, up to 10% of its length and if it were a single vehicle (indivisible load), 15%.
- All appropriate precautions must be taken to avoid damage or danger to other road users, and the protruding end must be protected to reduce the effects of a possible friction or collision.
- It must be marked using the V-20 sign referred to in Annex XI of the General Vehicle Regulations. This sign must be placed at the rear end of the load so that it remains constantly perpendicular to the axis of the vehicle.

In relation to the queries made to the DGT about the possibility of a motorhome towing a tourist vehicle, this possibility is not permitted in the General Vehicle Regulations, since it only contemplates that a towing vehicle can tow a trailer or semi-trailer (articles 13 and 26). Likewise, only "Public road assistance operators" may carry out the action of towing or dragging vehicles that have broken down on public roads or are immobilized for any other reason, as determined by Royal Decree 159/2021, of March 16, which regulates assistance services on public roads.

Without prejudice to the foregoing, the circulation of a set of vehicles consisting of a motorhome and a trailer or semi-trailer on which another vehicle is transported is permitted if the set meets the conditions for circulation on public roads,

It complies with the technical requirements set out in Regulation (EU) 2018/858 and UNECE Regulations 55 or 102 on mechanical coupling devices and also does not exceed the maximum authorised length for these sets, which is 18.75 metres for trailers and 16.50 metres for semi-trailers.

9.- ENTRY INTO FORCE

This instruction repeals the previous DGT Instruction 08/V-74 for Motorhomes.

This instruction will enter into force on the date of its signature.

Which is made public for general knowledge and compliance.

Madrid, on the date of electronic signature
THE MANAGER

Pere Navarro Olivella

TO ALL UNITS OF THE ORGANISM