

Car Parks TAFF Discussion Paper – 3 March 2021

A revised policy for motorhomes and campervans in EDDC pay and display car parks

1. Introduction

- a. In common with many other parts of the UK and the southwest region, here in East Devon we continue to see increasing numbers of campervans and motorhomes on our highways and in our public car parks. The pandemic may have even accelerated a trend towards independent UK holidays but it remains a fact that we are all seeing more and more vans of various kinds, ranging from an unconverted short wheel base panel van offering no accommodation other than a mattress or airbed in the load area right through to large fully self-contained high specification luxury motorhomes costing well over £100,000.
- b. Some of these visitors will have been looking for official licensed campsites but increasing numbers appear to be actively seeking the freedom of parking overnight in unauthorised locations. These may (or in some cases may not) be in circumstances that amount to contraventions of either on-street or public car park rules and regulations. Equally, the behaviour of the occupiers of these vehicles may (or may not) be detrimental to the locality (perhaps through waste water discharge, domestic refuse disposal, visual amenity, loss of parking space, noise and obstruction of pavements or highway with items such as tables, chairs, barbecues, water sports equipment, fire wood etc).

2. Current Policy

- a. In 4 March 2015, this Council approved a [policy](#) (see appendix 1) that prohibited the parking of motorhomes and campervans in any of our public car parks between the hours of 22:00h and 08:00h the following day.
- b. Prior to the introduction of this policy, this Council used to have simple rule in our Parking Places Order that specified “no overnight sleeping” in our car parks but this rule has widely been acknowledged in the industry as being almost impossible to enforce. By 2015 we had also seen a new problem emerge – with our inexpensive permit tariffs (now just £100 per year) we were inadvertently encouraging local motorhome and campervan owners to use some of our car parks as a cheap storage facility for their vehicles when they were not in use – with the resultant pressure on parking availability for visitors and town centre shoppers. Accordingly Cabinet considered papers that I had prepared and made decisions that this Council:
 - i. wished to encourage day visitors in motorhomes and campervans – so these vehicles are currently allowed to use any car park on any day but only between 08:00h and 22:00h daily)
 - ii. was interested in a pilot scheme whereby we would consider the impact of allowing overnight “camping” for up to 3 consecutive nights in specified car parks in Exmouth (this pilot is about to enter its third season at the request of Exmouth Town Council) and that overnight parking of any campervan or motorhome would not be allowed in any other car park (to prevent both storage and overnight camping).

3. The Issues

- i. The Exmouth pilot has been interesting and I would ask Members to accept that our 2015 policy is now in need of a revision to recognise both the continuing demand for short term overnight pitches for campervans and motorhomes in our towns and rural areas along with the issues and tensions that are arising in our communities as these vehicles continue to “find” on-street locations for overnight parking.
- ii. We do already see evidence of overnight stays in car parks that had not been included in the Exmouth pilot and I would invite Members to consider whether it is this Council’s role to acknowledge that measures to carefully and sensitively fulfil this demand (rather than continuing to treat overnight parking as a “parking contravention” or some form of “anti-social behaviour”) may well have benefits for both our town economies and for our own revenue.
- iii. There is also the relevant consideration of other alternatives available for these visitors. Many of them as we know are already choosing on-street locations (I have recently been told of ongoing issues at Exmouth seafront and nearby residential areas such as Foxholes Hill and the Avenues, residential areas around Seaton seafront and Seaton Hole along with other locations in Beer and Sidmouth. I feel sure there will be others. The long-term answer to this issue must of necessity involve further engagement with our colleagues in Devon County Council’s Highways’ team but to date, the message I have received is that overnight parking at many locations appears to be lawful.
- iv. It is also the case that our own residents are choosing small and medium sized camper vans as either their main or second vehicle and in some cases our own policy currently prevents them from parking overnight in public car parks close to their own homes.
- v. There is also an important debate to be had around the extent to which this Council wants to intervene in this matter.
- vi. The pilot has raised a number of as yet unresolved questions around the rules and regulations that would need to be imposed on any sites where we decide it would be appropriate to allow overnight stays. It is also important that we consider what level of facilities we want to offer our customers and of course, the possible consequences of encouraging overnight stays in the absence of such facilities. I am of course referring to fresh water provision, waste water disposal, domestic refuse disposal, electrical hook ups, outdoor space (for tables, chairs, barbecues etc.) and of course fire safety and the separation between vehicles. A degree of self-regulation may of course be assumed but depending upon the level of our offer, I would recommend that we build in suitable and sufficient resources to properly manage and where necessary enforce compliance with our rules and regulations.

4. Recommendations

Within this forum, I would ask Members to provide policy guidance and to recommend a broad strategic framework for our work in this area, setting out the Council's position in respect of the following:

4.1 Day visitors

No change seems necessary to our present policy. Visitors and residents may use any of our public car parks but if their vehicle is unable to park wholly within one of our standard parking bays (2.4m x 4.8m) then they must parking with care. If the vehicle is left in such a way that it prevents another vehicle from using any of the other parking bays then those bays must also be paid for by purchasing two or more simultaneous parking sessions and displaying all tickets on the windscreen accordingly. Alternatively if a vehicle "overhang" can be safely accommodated over (say) a grass verge without obstructing safe pedestrian passage then this vehicle may park for payment of a single parking session. Longer vehicles may NOT be left protruding out into the general circulation areas of the car park and where relevant, should never overhang the pavement or carriage way or an adjacent highway. Contraventions discovered by our Civil Enforcement Officer will be enforced by a penalty charge notice under Civil Parking Enforcement rules.

4.2 Short break overnight stays

I propose that overnight stays in car parks can be allowed (subject to strict terms and conditions of use) in any of our pay and display car parks that are "deemed suitable" in consultation with Ward Members and the relevant Town or Parish Council. It may be appropriate to allow overnight stays of up to two or three consecutive nights in suitable locations. The Exmouth pilot has been broadly successful insofar as we now know that there is a significant and growing demand from our visitors for short duration "aire" style facilities in East Devon's public car parks. It is arguable that short duration stays by vans with self-contained on-board facilities are equipped for short stays in any location and we do not necessarily need to offer anything more than a suitable parking space. However, we may wish to consider providing drinking water facilities and domestic refuse disposal facilities, those costs being covered by new overnight charges.

4.3 Fire Safety

The Council must only allow overnight stays in circumstances that are compliant with relevant fire safety legislation. We will therefore need to manage our car parks in accordance with the appropriate guidance on the safe separation of vans staying overnight. This is a significant factor and despite our "advisory notices" on site during the Exmouth pilot, the reality has been that customers have chosen to park closer to other vehicles than it is safe to do. By formally allowing overnight stays, the Council is not creating a campsite and licensing conditions do not apply. However, the Regulatory Reform (Fire Safety) Order 2005 would apply to the car park site (although not to individual vehicles that parking there because there is an exemption for vehicles that are licenced for use on the road (under the Vehicle Excise and Registration Act 1994) where separate controls apply. We are advised that the sensible "safe" separation for visiting motorhomes and campervans should be at least 3metres. This means that in effect overnight parking would only be allowed in a 2.4 metre wide bay where there are then two empty bays between that vehicle and the next vehicle. This separation is not required during daytime hours and compliance with this

requirement between 22:00h and 08:00h would appear to be a practical way forward. In a purpose built facility (see 4.6 below), this would mean a 2.5m wide parking space would allow a vehicle to park and the occupants to exit the vehicle. With an additional 3 m (1.5 m either side) would mean that no vehicle is less than 3 m apart. Therefore, the total width of the parking bay would be 5.5 m. More information is available [here](#) and has been reproduced in appendix 2.

4.4 Tariffs

I propose that motorhome and campervan customers will NOT be eligible for purchasing any of our standard car park permits and (subject to special arrangements for the residents' scheme proposed below) will only be permitted to use our pay and display car parks on a "pay as you use" basis.

An appropriate tariff to reflect the value of these "casual" overnight stays in approved car parks (where no other facilities are provided) for one, two or three consecutive nights only (with no return permitted within 24 hours) need careful consideration.

Locally tariffs vary according to demand. I have reviewed current offers around Devon and Dorset via internet searches and it is clear that a customer seeking a 2-night stay on a pitch within a traditional out of town site in July or August will expect to be paying something of the order of £60 to £70 for those two nights. The same pitch in early March (there is already limited availability) could be as low as £15 for the two nights in certain locations.

I believe we will be hearing representations from a number of motorhome customers advocating the French "aire" or German "stellplatz" which are typically inexpensive and not managed by a site warden.

In my view, our current tariff of £11 per night in the Exmouth pilot is deliberately inexpensive (bearing in mind that it also includes 24 hours parking in a prime location). It was based on the previously charged on-street tariff so that the pilot did not act as a deterrent and sought to encourage existing visitors to relocate from the desirable seafront highway parking spaces into a less intrusive location within an off-street car park.

Whilst a charge somewhere between £20 and £35 for 24 hours (to include an overnight stay) is attractive on the face of it, we do need to carefully balance this with the risk that the charges will either drive-away visitors to other areas – or will displace them back to other on-street locations where a range of unintended consequences might arise.

4.5 Arrangements for local residents

Residents will still be unable to purchase a parking permit to use our public car parks for long-term storage of motorhomes and campervans when they are not in use. However, we will on a case-by-case basis consider "exemption" permits for residents who can demonstrate that they rely on a small campervan as their regular daily transport and that they do not have suitable alternative off-street parking facilities available elsewhere. One safeguard that we can introduce is to make it a condition that the exemption will only apply in areas where the resident lives in close proximity to the car park in question and where the vehicle is registered and insured in their name at that home address.

4.6 Dedicated sites

Officers would also like to explore the possibility of creating dedicated motorhome / campervan pitches within sites with appropriate facilities to allow longer stays and for which a premium overnight rate comparable with commercial campsites could be charged.

We would propose beginning a formal consultation process with local Members and Natural England this winter to consider the impact of the first such development on the site of Exmouth's former lorry park adjacent to the Estuary. The implementation of this would be subject to further consideration by Members in due course in terms of financial investment decisions and might also need to be the subject of a planning application depending on the exact details of the change from "Lorry Park" to "camp site"