



**REPORT TO: ECONOMIC DEVELOPMENT AND INFRASTRUCTURE
SERVICES COMMITTEE ON 4 FEBRUARY 2025**

SUBJECT: OVERNIGHT STAYS BY CAMPERVANS AND MOTORHOMES

**BY: DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND
FINANCE)**

1. REASON FOR REPORT

- 1.1 To inform committee of the current position regarding overnight stays for campervans and motorhomes on Council owned land, and, to seek approval to consult with local communities on how overnight parking should be formally managed and the suggested roadmap for progressing this issue.
- 1.2 This report is submitted to Council in terms of Section III (F) (11) of the Council's Scheme of Administration relating to exercising Council functions in relation to Open Spaces and section (28) the promotion of tourism in Moray.

2. RECOMMENDATION

2.1 It is recommended that Committee:

- (i) consider and note the background information relating to overnight stays by campervan and motorhomes;**
- (ii) approve the list of sites at paragraph 11.2 to be considered as a designated car park for overnight stays for campervan and motorhomes;**
- (iii) approve that a consultation exercise is undertaken with local communities to obtain information on how local communities feel overnight stays should be managed;**
- (iv) approve that the findings of the consultation are presented to a future meeting of this Committee for members to consider and decide how overnight stays should formally be managed in Moray on Council owned land; and**
- (v) approve the suggested roadmap for progressing an overnight stays scheme.**

3. BACKGROUND

- 3.1 During the late summer of 2024 complaints were received relating to unauthorised overnight parking in the car park at certain Open Space locations. In the absence of any formal approval permitting overnight stays at these locations, and to address the concerns raised, signage already approved and in use at certain locations around Moray, was erected advising campervan and motorhome users that overnight parking was not permitted.
- 3.2 The erection of the signage attracted the attention from locals/user groups that were in support of the overnight stays.

4. CURRENT PROVISION FOR CAMPERVAN/MOTORHOME SITES

- 4.1 Currently there are no authorised locations for overnight stays for campervan and motorhomes on Council land. The current commercial sites within Moray, such as those located at Findhorn or Cullen, conform to the Councils 'Standards Approved by the Moray Council for overnight parking of Motorhomes'. These standards stipulate the Council's requirements for overnight parking and can be found [here](#).
- 4.2 The standards are in accordance with the Caravan Sites and Control of Development Act 1960.

5. CURRENT PARKING AREAS FOR MOTORHOME VEHICLES ON COUNCIL LAND

- 5.1 Parking areas are available in Moray to drivers of motorhome vehicles. These areas are for parking only and prohibit sleeping, camping and cooking. The designated car parks available for motorhomes are:
- Lossie Green Car Park Elgin, IV30 1RJ
 - Keith Lorry Park, AB55 5HJ

6. CURRENT CAMPERVAN WASTE DISPOSAL POINTS

- 6.1 The Council currently provides free waste disposal points for campervan and motorhome waste at the following locations:
- Ballindalloch Toilets, Ballindalloch.
 - Fiddich Park, Craigellachie
 - Burghead harbour, Burghead

7. BENCHMARKING

- 7.1 A benchmarking exercise has been undertaken to understand how overnight stays for campervans is managed in neighbouring authority areas. This has been summarised in the table below (there was no information available on Aberdeenshire or Aberdeen City websites):

Authority	Scheme	Facilities	Restrictions	Included benefits of the scheme
Highland Council	Highland Campervan and Motorhome Scheme: Voluntary scheme open to anyone staying at any site in their network of dedicated overnight carparks. Current cost is £40 for a 7 day membership.	Parking only	<ul style="list-style-type: none"> • Use of outdoor tables, chairs and awning is not permitted • Overnight parking is available from 10pm to 8am • There is a no return policy in place at each car park for 72 hours • All activities must be contained within the vehicle • Use allocated bays when provided • Ensure wastewater is disposed of at official site 	<ul style="list-style-type: none"> • Inclusive overnight parking across the network of dedicated sites • Contribution to the High Restoration Fund • Direct investment for sustainable tourism • Free daily access to showering and changing in an High Life Highland Leisure location
Forestry and Land Scotland	Operate a 'Stay the Night' system for self-contained motorhomes and campervan. Car parking charges apply- £7 for the majority of places.	Dependant upon site but range from parking only to provision of waste disposal point.	<ul style="list-style-type: none"> • Parking is permitted for one night only • Restriction on numbers permitted. • Minimum 4m between parking. • Payment is through RingGo. • Overnight hours are 6pm to 10am. • No use of generators – • Use of own self-contained toilet facilities inside the vehicle only. • No blocking of any gates or trails. • No parking on verges. 	<ul style="list-style-type: none"> •

Authority	Scheme	Facilities	Restrictions	Included benefits of the scheme
			<ul style="list-style-type: none"> • No fires or barbecues. • All rubbish to be taken away • Noise levels kept down, especially between 10 pm to 7am. • Dogs kept on a lead or under close control 	

8. **PROPOSED SCHEME FOR OVERNIGHT STAYS FOR CAMPERVAN AND MOTORHOMES IN COUNCIL DESIGNATED CAR PARKS**

- 8.1 The potential economic benefits to local communities through permitting overnight stays could be significant. The principle behind considering the options available to facilitate overnight stays on Council designated sites is not to compete with the current commercial providers, or provide facilities for long stay holidays, but more to provide for on-the-go type overnight stays, within designated parameters, which can support and facilitate sustainable tourism within Moray, pending support from the local communities.
- 8.2 Whilst a scheme is still to be developed, it is envisaged that any scheme for overnight stays on designated sites would provide a positive contribution to sustainable tourism and would follow the principles of the Forestry and Land Scotland model, for example:
- Overnight parking only
 - Only self-contained motorhomes/campervans with onboard facilities will be allowed to use the sites
 - Restricted to one night only
 - Overnight stays would only be permitted at designated car parks
 - There would be no provision of waste disposal points
 - Setting up of benches, chairs and awnings would not be permitted
 - Overnight parking charges would apply
 - Restriction on numbers to a maximum of 2 campervan/motorhomes- dependent upon the site this could be 1 vehicle
- 8.3 This approach is considered to be the most economical scheme to implement.
- 8.4 The proposed overnight fee would be in the region of £7 to be comparable to other local overnight stays provided by Forestry and Land Scotland. Payments would be made using the Councils current 'pay by phone' parking app.

- 8.5 Whilst staying overnight would be chargeable, in the first instance this would be reliant on goodwill. The Council could have enforcement powers, but the actual cost of enforcement is likely to be prohibitive.
- 8.6 Signage would be erected at the locations to inform site users of the following:
- Information signposting local campsites with facilities
 - Information on Council toilet and waste disposal points
 - Responsible behaviours and the conditions of staying overnight.
- 8.7 In addition the information on the Council's website would be amended to promote overnight stays and the suitable locations.

9. REGULATORY ISSUES

- 9.1 Under section 11 of Schedule 1 of the Caravan Sites and Control of Development Act 1960 a site licence shall not be required for the use as a caravan site of land occupied by the local authority in whose area the land is situated.
- 9.2 Planning have advised that should a site be designated an overnight stay location that planning permission would be required, on the basis of a 'change of use'. The application would be classed as a 'local' development that would likely be determined under delegated powers by Officers. The planning application cost would be £576 per site (on the basis the site area does not exceed 0.1 ha), with a decision taking around 8 weeks from receipt of the application.
- 9.3 Guidance from Environmental Health is that if the Council wishes to allow overnight stays for self-contained campervans and motorhomes in our parks/lay-byes there would not be anything from an Environmental Health perspective to prevent this.
- 9.4 In order to be able to take enforcement action against non-payment for parking, a car parking order must be placed on the site. Therefore, any sites which are designated for an overnight stay would need to first go through the formal Car Parking Order consultation and approval process. Whilst income would be generated from overnight stays, if the primary purpose is to balance community interest and tourism, and payment in the first instance is reliant on goodwill rather than enforcement, it is proposed that seeking car parking orders is a secondary consideration of the scheme following its initial introduction.

10. Campaign for Real Aires UK (CAMpRA)

- 10.1 CAMpRA is a UK-based organisation that aims to increase the number of Aires in the country (the term aires is taken from the French 'aire de camping-car' meaning a stopping place for campervans and motorhomes). The organisations website contains a lot of information with regards the best practice and guidance on creating overnight locations for motorhomes and campervans. The website is [CAMpRA UK Ltd – Campaign for Real Aires UK](#)

- 10.2 The document entitled 'Guide to setting up an Aire' provides advice on setting up a site for self-contained caravans. Guidance in this document would be used if an overnight stay scheme is introduced in Moray.
- 10.3 The guidance from CAMpRA is that for self-contained units a parking distance of 3m is recommended in line with the findings of a fire safety report which they commissioned.

11. **PROPOSED LOCATIONS FOR OVERNIGHTS STAYS FOR CAMPERVAN**

- 11.1 The intention would be to have a small number of sites, ideally with a geographic spread around Moray. However, given the vehicles would need to park at least 3m apart the sites need to be able to accommodate such vehicles without significantly restricting the overall capacity of the car park for other site users.
- 11.2 The proposed sites considered suitable as a designated overnight stay car park for campervan and motorhomes are shown in the table below. A map showing the geographical spread of these sites is shown in **Appendix 1**.

Number on map	Car Park	Area	Proposed number of parking spaces	Land owned or leased
1	Cullen Links	Cullen	3	Moray Council
2	Strathlene	Buckie	3	Moray Council
3	Portgordon Harbour	Portgordon	2	Three quarters owned by Moray Council
4	Station Car Park	Lossiemouth	2	Moray Council
5	West Beach Car Park	Lossiemouth	4	Leased
6	Burghead Car Park	Burghead	2	Moray Council
7	Califer Hill Viewpoint	Forres	2	Moray Council
8	Ballindalloch Car Park	Ballindalloch	2	Moray Council
9	Alice Littler Park	Aberlour	4	Moray Council
10	Fiddich Park	Craigellachie	3	Moray Council

- 11.3 With regards the proposed sites, it is envisaged that only one site would be provided in an area (ie in Lossiemouth). This is proposed to be selected based on the outcome of a public consultation.
- 11.4 Whilst it is proposed that a total of 9 locations are included in an overnight scheme. As part of any consultation exercise, information on alternative locations that communities would like including in the scheme could be obtained. Any additional schemes would potentially need to be done as a secondary development because of the need to seek planning permission.

12. **COST IMPLICATIONS**

- 12.1 Where a site to be designated an overnight stay location, the Council would incur additional costs involved in setting up the scheme. The estimated set up costs for the overnight scheme are shown below:

Element	Cost
Planning Application	£5760 (£576 per site)
Signage and demarcation of spaces	£12,000
Total	£17,760

- 12.2 The scheme will generate income and therefore will provide a return on the investment. Based on a charge of £7 and an anticipated achievable level of overnight usage, it is projected that the cost of the scheme would be covered within three years.

- 12.3 The cost recovery model is calculated as follows:

Cost (£17,760), divided by the charge (£7), divided by number of spaces (25), divided by numbers of years (3 years), equals 34 night usage per year per space. This level of usage is deemed achievable over a year and so the scheme is projected to be cost recoverable over 3 years.

13. **NEXT STEPS**

- 13.1 The table below outlines the suggested roadmap to facilitate the Council having a formal scheme on low level overnight stays for campervan and motorhomes at designated sites.

Stages	Action	Stakeholders	Timescale
1	Undertake a consultation with the local communities (those where a site has been identified) to establish the appetite for the provision of low level overnight stays for campervans and motorhomes. Consultation to consider: <ul style="list-style-type: none">• Are communities and businesses in favour of overnight stays for campervan and motorhomes in their area (the consultation would include the list of car parks so participants could see site located in their area).• What are the perceived	<ul style="list-style-type: none">• Community Councils• Local Community Associations• Local Business Forums/ Chamber of Commerce• Local park groups• Local resident groups	February/ March 2025

Stages	Action	Stakeholders	Timescale
	benefits from permitting overnight stays <ul style="list-style-type: none"> What are the perceived negative issues from permitting overnight stays 		
	•	•	
3	Report to ED&I in April 2025 to: <ul style="list-style-type: none"> Inform committee of the results of the consultation Set a proposed charge for overnight stay (indicative charge of £7). and to seek approval to progress in accordance with the findings of the preliminary work.	<ul style="list-style-type: none"> Service Manager (Environmental Protection) 	April 2025
4	Submit planning application	<ul style="list-style-type: none"> Service Manager (Environmental Protection) Planning Department 	Commence May
5	Report to Full Council to seek approval of the overnight stay charge and the additional funds needed to deliver the scheme (Indicative charge of £7) and the additional funding required for the signage.	<ul style="list-style-type: none"> Service Manager (Environmental Protection) 	May 2025
6	Arrange for signage and demarcation to be undertaken on site	<ul style="list-style-type: none"> Service Manager (Environmental Protection) 	To be determined

13.2 Dependent upon on the outcome of the various stages within the roadmap, there may be some slippage on the timescales. If possible, it is intended to have a formal overnight stay scheme at designated sites in place for the start of the summer holiday season of 2025.

14. **RISKS**

- 14.1 There is a risk that the results from the community consultation may not be conclusive or find that there is a desire for overnight stays within the community.
- 14.2 Given the number of different stages that need to be completed there is the risk that a formal scheme may not be in place for the start of the 2025 summer holiday season.

15. **PROS AND CONS OF HAVING A SCHEME IN PLACE FOR OVERNIGHT STAYS AT DESIGNATED SITES**

- 15.1 The pros and cons associated with having a scheme in place for overnight stays for campervan and motorhomes are shown in the table below.

Pros	Cons
Would mean the Council has a formal scheme and designated parking for overnight stays for campervan and motorhomes.	May increase visitor numbers which some residents may not like
Would provide tourists with dedicated sites to plan their journeys	Would restrict the availability of car parking spaces for other site users
Provision of designated overnight parking could attract visitors to an area so boosting the local economy	Potential costs associated with implementing an overnight stay scheme include: <ul style="list-style-type: none"> • Signage • White lining
Could generate income for the Council which could be used to support or finance monitoring of the scheme	Could increase workload for other Council teams, ie setting up Car Parking Orders, Enforcement of non payments
Potential to include designated sites into the Councils current Mobile App for making car park payments	Payment would be by card only so the method of payment would be limited
	Might increase demand on services if infrastructure or resources aren't there to support a new approach - e.g. waste management , maintenance of car parks, toilets, water supply etc
	Scheme would be limited to only a small number of suitable sites

16. **SUMMARY OF IMPLICATIONS**

(a) **Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))**

A consultation on whether the Council should implement a formal policy position on overnight stays for campervans and motorhomes meets aligns with the corporate plan with regards to building a thriving, resilient empowered communities.

(b) **Policy and Legal**

The report sets out an approach to balance different policy interests regarding building a stronger economy, encouraging tourism, and our approach to places and communities. There are various legal and regulatory factors which are set out in detail in the report.

(c) **Financial implications**

Should the scheme proceed and expenditure exceed income:
When the Council approved the budget for 2024/25 on 28 February 2024 (paragraph 7 of the Minute refers) it balanced only by using reserves. The indicative 3 year budget shows a likely requirement to continue to make savings in the order of £13 million in the next two years. All financial decisions must be made in this context and only essential

additional expenditure should be agreed in the course of the year. In making this determination the committee should consider whether the financial risk to the Council of incurring additional expenditure outweighs the risk to the Council of not incurring that expenditure, as set out in the risk section below and whether a decision on funding could reasonably be deferred until the budget for future years is approved. The final decision on expenditure will be made following the consultation process. As set out above the scheme is indicated to be financially positive over three years. It should also be noted that one third of the costs relate to planning fees which are an internal transfer of funds within the council.

(d) Risk Implications

The risk implications arising directly from this report are that the result may not be conclusive and opinions may be split across communities with regards to whether overnight stays are considered acceptable within an area.

Without a clear and consistent position on campervan/motorhome overnight stays we will not have a management framework in place to manage this issue and to support communities deal with the increase in motorhome activity.

(e) Staffing Implications

There are no staffing implications arising directly from this report. Although there could be resource and staffing implications in the future dependant, upon whether a formal policy is adopted, and how this is monitored and managed.

(f) Property

There are no material property implications arising from this report.

(g) Equalities/Socio Economic Impact

There are no equalities implications or implications for the socio-economic duty arising from this report.

(h) Climate Change and Biodiversity Impacts

There are no specific climate change or biodiversity impacts arising from the report.

(i) Consultations

The Depute Chief Executive (Economy, Environment and Finance), Head of Environmental and Commercial Service, Legal Services Manager, Head of Financial Services, Equalities Officer, Principal Climate Change Strategy Officer, Property Asset Manager, Principal Planning Officer, Principal Environmental Health Officer, Open Space Manager, Senior Engineer (Transportation), Senior Administration Officer (Environmental Services) and Democratic Services Manager have been consulted and their comments incorporated into the report.

17. CONCLUSION

- 17.1 Committee is asked to note the background information relating to overnight stays by campervan and motorhomes.**
- 17.2 Committee is asked to approve the list of sites to be considered as a designated car park overnight stays for campervan and motorhomes.**
- 17.3 Committee is asked to approve that a consultation exercise is undertaken with local communities to obtain information on how local communities feel overnight stays should be managed.**
- 17.4 Committee is asked to approve that the findings of the consultation are presented to a future meeting of this Committee for members to consider and decide how overnight stays should formally be managed Moray on Council owned land.**
- 17.5 Committee is asked to approve the suggested roadmap for progressing an overnight stays scheme.**

Author of Report: Paul Wolverson, Service Manager

Background Papers:

Ref SPMAN-524642768-1197