FREEDOM CAMPING

OPTIONS PAPER ON MOTORHOME USE IN FIFE

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1 EXECUTIVE SUMMARY

1.1 Background

The term "*Freedom Camping*" relates to discrete informal parking with a Motorhome overnight at non-designated camp sites as advocated by the Campervan & Motor Home Professional Association (CAMPA). Ref http://www.campa.org.uk

With ever increasing numbers of Motorhome User opting to use car parks and other locations for overnight stays in Fife, signs of tension are now growing as Freedom Camping has become unsustainable at some key areas. In turn this is placing operational and environmental pressure on visitor attractions originally designed for day time recreational use only.

This paper has been written by Fife Coast & Countryside Trust to identify ways to safely and sustainably operate **Unregulated Public Car Parks** within the current legislation to meet realistic expectations for all the Users, Communities, Land Owners, Land Managers, Fife Council and other Stakeholders in relation to Freedom Camping.

The report identifies alternative options for future operations and recommendations in relation to freedom camping. It also highlights the consequences if the status quo remains and nothing is done.

1.2 Findings

Motorhome usage in Fife has the potential to deliver the following benefits:

- Economic investment
- Social inclusion
- Environmental awareness
- Sustainability

However to maximize the benefits of this growing market Fife needs to provide a system of rules and regulations relating to the do's and don'ts for Freedom Camping in the Kingdom. The current practice of parking over night at many popular locations has become unsustainable and hazardous. The potential for fire and fire spread between Motorhomes increases every year. Freedom Camping in its current format impacts negatively on the environment and creates an unacceptable risk for the motorhome community and other stakeholders. To do nothing is no longer an option and will create further discord.

This report highlights the need for immediate action to mitigate against the risks identified at Elie Ruby Bay and Kingsbarns beach car parks with recommended actions.

Robbie Blyth, Head of Operations (Fife Coast & Countryside Trust)

2 WHAT CONSTITUTES A MOTORHOME

Although the term motorhome is widely used, it is not officially recognised in the UK as a vehicle type. The legislative term used in the UK is "*Motor Caravan*" for the purpose of this report vehicle types are divided into 4 categories and collectively called a *Motorhome*:

2.1 Campervans

Can be anything from a converted car like a Renault Kangoo or Citroen Berlingo to a large Transit-style van.



Image 1

2.2 Motorhomes

Are low-profile coach-built motorhomes. They typically have a fixed double bed above and include a wash-room that has a shower and a toilet holding tank. Small motorhomes allow the freedom to camp without having to dig holes to toilet (open defecation). The vehicle style is normally based on a Luton van frame.



Image 2

2.3 A-Class Motorhomes

Are what most people picture when they hear the word "motorhome". Big, sleek, with the driver's cab integrated into the rest of the vehicle. These are usually well-insulated, and with room for four or more people to be comfortable both during the day and at night. Some A-class motorhomes come in under the 3.5 tonne driving licence limit, so you can drive them without taking another test e.g. if you drive a Fiat 500 you can legally drive an A-Class Motorhome.



Image 3

2.4 American-style Recreational Vehicles

Come as big as a 52-seater coach, requiring a large-vehicle driving licence to legally operate. They can be too big for standard-size pitches on a campsite, very expensive on fuel, parts, tax and insurance. They normally run on diesel and can only manage 8-10 miles per gallon and are far too big for small roads especially unpaved lanes and single-track roads e.g. the approach to Kingsbarns beach (Cambo Sands). Ref: Goggle Earth Kingsbarns



Image 4

3 RELEVANT CURRENT LAWS ON PARKING (Motorhomes)

3.1 Health & Safety at Work Act 1974

S.7 (A) of the Health & Safety at Work Act 1974 requires that all employees and employers must take reasonable care for the health and safety of themselves and other persons who may be affected by what they do, or fail to do at work. This duty implies not only avoiding silly or reckless behaviour, but also taking positive steps to understand hazards in the workplace; to comply with safety rules and procedures; to ensure that nothing they do (or fail to do) puts themselves or others at risk. This report has identified the need to consider risk assessments along with adequate control measures for venues that are potentially being used for freedom camping.

Under the Health and Safety at Work, etc. Act 1974 car park owners and any contractors who operate these sites on their behalf, have a duty of care to ensure that these facilities are safe to use. Safe compliance can be achieved through ongoing maintenance, site condition surveys, risk assessments, zonation and safe operating procedures.

Car parks can present hazards to service users from moving vehicles, crime, trip hazards, general poor maintenance and substandard work based tasks. It's common practice for Motorhomes to park far to closes together thus presenting a significant hazard. Motorhomes have cooking and heating facilities, presenting a greater risk of fire and its subsequent rapid spread in the event of an emergency.

Industry guidance in relation to tents, caravans and motorhome is that units should be pitched at least 6 metres apart to prevent the potential spread of fire. The operators of Unregulated Public Car Parks are limited in what they can do, however not everything is currently being done that is reasonable and practical to reduce the risk in Fife.

In addition to industry guidance the Scottish Fire and Rescue Service have issued guidance in relation to caravan & mobile home parks fire safety for site operators. It highlights the risks associated with motorhomes and unsafe practices. Ref: <u>SF&RS Guidance</u>

3.2 Caravan Sites and Control of Development Act 1960

Extract from the Caravan and Control of Development Act 1960: S1 (4) of the act defines a "caravan site" as "land on which a caravan is stationed for the purpose of human habitation and land which is used in conjunction with land on which a caravan is so stationed". Therefore as soon as anyone brings a motorhome onto a piece of land for the purpose of human habitation (rather than simply parking or storage) the land becomes a caravan site. It doesn't matter that the land is used as a carpark to use it as a stopover by virtue of the act it's a caravan site as far as the law is concerned.



1960 CHAPTER 62 8 and 9 Eliz 2

A motorhome falls within the definition of a caravan in the *Caravan Sites and Control of Development Act 1960* and the *Caravan Sites Act 1968* as amended. Ref: <u>Backer v Secretary</u>

Any individual or organisation offering overnight stops for motorhomes in the UK must do so in compliance with the Caravan and Control of Development Act 1960. Without a license or exemption, individuals and organisations technically may be breaking the law. Ref: Caravan Sites and Control of Development Act 1960

Historically Fife Council and the former District Councils erected signage at their Unregulated Public Car Parks to forbid Freedom Camping. Therefore being seen to indemnify themselves from breaching legislation and to dissuade overnight parking.

Freedom camping without the landowner's permission can be dealt with by civil law action in relation to the vehicle/operator owner, however this can be costly and counterproductive as the process takes time to implement and in reality freedom camping is transient by its nature.

3.3 Transportation Services (Fife Council) – Consolidation Order

Parking is regulated by various Acts and Regulations, including the Road Traffic Regulation Act 1984, Road Traffic Act 1991 and Traffic Regulation Orders (TROs) made by local authorities for local purposes. All income generated from car park charges and associated fines under the terms of the various acts require to be ring fenced for the provision and management of the associated car parks. Currently 30 car parks managed by Transportation Services (Fife Council) charge for use mainly in urban locations.

In Fife the car parks that are managed through the use of the listed acts are collectively known as a "**Consolidation Order**" these parking facilities rarely experience operational problems related to Freedom Camping. As robust parking policies and procedures are in place to prevent and control high levels of freedom camping.

In the event that a vehicle owner doesn't comply with the relevant parking restrictions a fixed penalty notice (£60 reduced to £30 if paid within 28 days) may be issued by a delegated Fife Council Officer. Car parks with consolidation orders in operation require to have robust signage and lined parking bays that follow the industry standard best practice. Ref: British Parking Association

Not all of the 174 car parks managed by Transportation Services have consolidation orders in operation though the ones that are likely to present challenges in terms of inappropriate parking do. The following link takes you to all car parks managed by Transportation Services. Ref: Online Map Carparks



Image 5 (Standard Consolidation Order Signage)

3.4 Unregulated Public Car Parks

A number of other Council departments and arm's length organisations who manage **Unregulated Public Car Parks** are used for freedom camping some of these facilities have now evolved into hybrid car parks/campsites proving difficult to manage at peak periods. This is exacerbated by the limited budget provision available to the affected departments.

In reality if a motorhome has a valid Ministry of Transport Test Certificate (MOT), Insurance and vehicle tax they can legally park overnight in car parks with no consolidation order. This has created poorly resourced free overnight motorhome facilities in areas never designed or envisaged for such activities.

It is standard practice to manage these sites with advisory signage, specific car park design, legislation (Road Traffic Act 1991) and from time to time civil litigation. The total number of Unregulated Public Car Parks on the councils assets register has been difficult to ascertain and an audit is required.

Freedom camping within an Unregulated Public Car Park is technically an offence however legal action is a complex process as highlighted in page 4 "Caravan Sites and Control of Development Act 1960.2



Image 6 (Craigmead Car Park, Lomond Regional Park)

3.5 St Andrews Links Trust – West Sands

St Andrews Links Trust (SALT) is the body formed by an Act of Parliament in 1974, responsible for the management and maintenance of the historic Links golf course and associated grounds of the West Sands Beach. The links act has enforceable byelaws. Ref: St Andrews Links Byelaws Extracts

Low level Freedom Camping was practiced at the West Sands for many years with minimal impact to the environment, requiring very little staff intervention. However with the increase of social media and word of mouth the practice became unsustainable. Prior to 2017 it was a common occurrence for the site to have between 20 and 40 units per night during peak periods.

In 2016 a presentation was given to the Fife Access Forum after a number of complaints from various stakeholders to FCCT and Fife Council. The presentation highlighted peak time usages, environmental challenges and potential funding streams. (Appendix 1)

An audit on West Sand motorhomes usage was undertaken at peak periods by FCCT staff (appendix 2) demonstrating high usage rates (2015 – 2017). In 2017 SALT invoked the byelaws under the Links Trust Act to control overnight parking and therefore stopping Freedom Camping on the West Sands. The unilateral action by SALT to protect their asset and brand though understandable and appropriate action has moved the challenges on to other coastal locations.

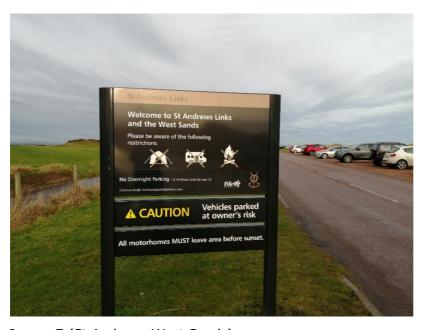


Image 7 (St Andrews West Sands)

4 OPERATIONAL AND ENVIRONMENTAL CHALLENGE

Most car parks used for Freedom Camping by their nature have associated facilities that require management. These can include public toilets, picnic tables, seating, bins, paths, interpretation signage, as well as managed flora and fauna.

However, the limited resources and funding available for the strategic and operational management of Unregulated Public Car Parks are by necessity targeted at day time operations since these facilities were never designed for high levels of Freedom Camping.

4.1 Waste Management & Littering

Like many other service users, Freedom Campers dispose of litter in designated waste bins. The levels of litter generated by Freedom Campers is far greater than day time service users. FCCT have had to increase the level of service on sites it manages on behalf of Fife Council as a direct result of this - with no additional resources.

The majority of Freedom Campers dispose of their waste in a responsible manner. There will always be a minority however who leave their waste behind or indeed when bins are at capacity, simply pile the rubbish at the side. This results in waste being strewn across the site, entering the water course, impacting on the wildlife and cleanliness of the area.



"In 2014 under the litter plan for Kingsbarns Beach Car Park we used to litter pick and maintain the bins 3 times a week (April – August). With the increase in Freedom Camping and the associated waste, we now have to undertake this task 7 days a week to keep on top of it". Jim Bell, Lead Litter Operative (FCCT)



"At Elie Ruby Bay many service users try to do the right thing and dispose of their waste in the designated litter bins however the more service users, the greater the waste deposited. People do not want to take litter home even when our bins are at capacity. This results in waste being spread over a vast area due to the wind and scavenging animals". Bob Simpson, Lead Litter Operative (FCCT)

4.2 Human Waste

Open defecation on various sites with no public toilet available or limited operational hours has increased as some motorhomes do not have self-contained units. As a result, some service users choose to toilet outside. This results in the environment suffering aesthetically and greater amounts of toxins are introduced into the ecosystem, potentially spreading disease. In August 2019 the matter was raised at the Elie and Royal Burgh of Earlsferry Community Council meeting and investigated by the Safer Communities Team (Fife Council). *Ref: RBE&ECC minutes*



"It is common practice to come across evidence of urine and fecal matter at the rear of the Craigmead and East Lomond public toilets" **George Eaves, Field Teams Manager (FCCT)**

4.3 Chemical Toilets

Most self-contained units in motorhomes have a chemical toilet system that must be emptied. Chemical toilet waste is also known as black waste and should be deposited in an Elsan Disposal Point (Chemical Disposal Point). Chemical toilet waste should never be disposed of in a public toilet. If this type of black waste is introduced into a septic tank it prevents the process of biological decomposition and drainage thus impacting on the environment.

It is a common occurrence for public toilets disconnection chambers to block due to excessive volumes of black waste deposited from motorhome cartridge systems. In 2019 this happened on several occasions at Elie Ruby Bay and Kingsbarns public toilets.

It is the responsibility of all individuals and companies to ensure that their activities do not harm the environment. The fines for pollution are up to £40,000, and those responsible for pollution can face a massive clean-up bill and possible prosecution. It is, therefore, in all our interests to ensure that pollution does not happen.





Image 8 and 8a (Elsan Toilet Waste, Elie Ruby Bay)



"It was a regular occurrence over the period April — August (2019) that we had to unblock the disconnection chambers at Elie Ruby Bay and Kingsbarns. When blocked the toilets had to be closed to the public and sewage got into the environment" Norrie Dick, Seasonal Litter Operative (FCCT)

4.4 Elie Ruby Bay

In 2019 the number of motorhomes using the 2-level car park at Ruby Bay reached an unacceptable and even dangerous level. Since there are no dedicated areas or zoning plans in operation at this site, the chances of a serious accident can no longer be ignored. In reality the car park is now being used as a seasonal campsite. It's not uncommon to have in excess of 15 motorhomes parked overnight creating blind spots and fire hazards.

If left unaddressed the potential for significant issues to arise is considered high resulting in conflict, vandalism and other forms of anti-social behavior. There is regular attention paid to this issue in constituency meetings and the local press with expectation to see positive steps being taken by Fife Council and FCCT and the issues resolved.

5 OPTIONS FOR CHANGE

In March 2017 the Scottish Government published a consultation paper entitled "Improving Parking in Scotland". The purpose of this consultation paper was to invite views from stakeholders on providing clarity and delivering a consistent approach to managing and enforcing parking on different types of public roads. The paper identified a wide range of traffic management challenges in relation to parking but not specifically Freedom Camping. Ref: Improving Parking in Scotland Consultation

The consultation report identified that "Parking policies form an essential part of a local road authority's traffic management strategy to help reduce congestion and improve safety. Irresponsible parking can and does have a negative impact, particularly when inconsiderate, obstructive or dangerous parking takes place". Ref: https://consult.gov.scot/road-policy/improving-parking-in-scotland/results/improvingparkinginscotland-pdf2.pdf

With hindsight an additional few questions on the consultation paper in respect to Freedom Camping may have provided the opportunity for affected stakeholders to comment on the challenges and opportunities that come with Freedom Camping. Given that this is a countrywide issue, Scotland needs to have a national conversation to form a potential long-term national strategy to accommodate, manage, and safely facilitate Freedom Camping.

The provision for Freedom Camping is not a statutory function for local authorities or their partners however Fife Council and FCCT recognise that the sustainable provision of public carparks is an important service for residents and visitors to the Kingdom. The great outdoors of Fife is arguably Scotland's biggest tourist attraction, attracting greater numbers of Freedom Campers every year. Therefore safe and adequate facilities need to be provided in a sustainable and coordinated manner.

To allow continued uncontrolled Freedom Camping could result in a serious accident and currently not everything is being practiced by carpark operators that is reasonable and practical to reduce the potential risk to service users and staff. Uncontrolled Freedom Camping also impacts on the visitor experience causing tensions within our impacted communities.

Fife requires a local strategy without delay and this study has identified a number of Options for Change with guidance that could be considered through consultation with all relevant stakeholders.

5.1 Local Byelaws

Byelaws are an effective way to legally regulate various types of activities in the UK including Freedom Camping. In 2017 the Loch Lomond and Trossachs Park Authority introduced Byelaws to protect the National Park from unsustainable use from March to September each year. These Byelaws were implemented to address the negative environmental impact at peak periods. Ref: <u>Loch Lomond Byelaws</u>

Fife Council and other bodies have powers under various Acts of Parliament to make byelaws, which are essentially local laws designed to deal with local issues. At present, byelaws must be approved by government before they can be brought into force. Byelaws are accompanied by sanction or penalty for non-observance. When passed, byelaws have the force of law within the areas to which they apply. The introduction of new byelaws is a devolved matter on application by the local authority or other designated bodies to the Scottish government.

Local Byelaws could help regulate unsustainable freedom camper levels and facilitate safer parking zonation in specific Unregulated Public Car Parks. For byelaws to be successful there will be a need for guidance, training and enforcement to be in place which will require additional staffing resources. There would also be a requirement for administration and legal support services. As such, the introduction of byelaws would require an ongoing annual budget. Local governments are having to make difficult fiscal choices and it would be difficult to justify the continued investment required to successfully introduce and enforce new byelaws to manage Freedom Camping.

The implementation of byelaws could also be deemed in some quarters as a rather draconian measure and an attack on the rights of motorhome users. To avoid this conflict there would need to be positive engagement, guidance and information sharing if byelaws where deemed appropriate.

5.2 Consolidation Orders – Transportation Services (Fife Council)

Fife Council's Transportation Services currently manage car parks within their directive through a Traffic Regulation Order (TRO). Historically multiple orders were in place and therefore a consolidation order was created which effectively pulled together all the different regulation orders under one heading with standardised terms and restrictions. This includes charges for parking, restrictions on parking out with a bay, banning the sale of goods in a car park, disabled spaces, etc.

TROs can be created for specific purposes and therefore if a standalone car park required that restrictions were significantly different from the overarching consolidation order, in theory Fife Council's Transportation Services could create a separate order.

All new orders needs to go through Council Committee for approval and out to public consultation. In principal this could place specific restrictions on Motorhomes. The challenges come with the signing and enforcing of such a restriction which tends to be a complex process.

The identification of problematic locations and the transfer to Transportation Services of these locations could be an option. However, as has happened with the St Andrews West Sands (page 6), action at individual problematic sites could merely move the challenge to another location.

Fife Council's Transportation Services would also require additional resources to effectively manage the extra facilities to meet the needs of stakeholders. This is all the more challenging given the service has been downsized recently, achieving over £1m in staff budget savings.



Image 9 (Kirkcaldy Esplanade)

5.3 Parking Charge Notices (PCN)

A Parking Charge Notice (PCN) scheme could be introduced to help control all forms of parking including Freedom Camping at the sites with no Consolidation Orders in operation. PCNs are not actually a fine. They are a service charge that private landowners and unregulated public car park owners can charge when someone parks on their land. Operators of the PCN scheme are required to register under the Approved Operator Scheme managed by the Driver and Vehicle Standards Agency (DVSA). Thus, allowing operators to purchase details of the registered keepers of vehicles if required. To be part of the scheme, operators are normally affiliated with the trade body of the British Parking Association (BPA). Ref: BPA

In practice, if an overnight Freedom Camper breached the terms and conditions e.g. parked out within a designated bay, over stayed the allocated time, didn't purchase a ticket or broke any relevant rules, then a PCN could be issued. What makes a PCN legal is that they are based on contract law. When a person parks a vehicle on a landowner's land under certain circumstances, they have entered into a contractual agreement with the land owner or site manager.

A PCN scheme would require financial investment for parking meters, signage and to designate parking bays. Such a strategy could be used as a tool to facilitate an integrated Motorhome parking policy and generate a small income to be reinvested back into effected car parks.

Currently the PCN scheme exists at a number of locations in Fife by various operators and in some cases creates a modest income for the carpark owner. After initial set up costs there would be an expectation that any proposed PCN initiative would be self-financing and therefore financially sustainable.

In addition to Freedom Camping charges there is the potential to introduce an affordable Car Parking charge for key sites. It should be noted though that the introduction of a parking charge may be unpopular with the public however small it may be. Even so, charging for parking could be an effective way of managing car parks provided that any income generated is ring fenced and used for the maintenance and ongoing management of the site e.g. resurfacing, upkeep of lines, signs and new technology.



Image 10 (Parking Charge Notice Signage)

5.4 Freedom Parking - Permit Scheme

A Freedom Parking Permit Scheme could be a simple and cost-effective method of verifying authorisation and sustainably facilitating Freedom Camping at a list of designated sites within Fife. Such a scheme could potentially be administered by FCCT.

A Freedom Parking Permit Scheme is based on the principal of common consent using current legislation in partnership with Freedom Campers and relevant stakeholders. The drivers for the scheme would be to work on the principle of stake holder engagement, information sharing, self-policing, advisory notices, and civil action only if required.

The mutual benefits of a Permit Scheme would be to create a welcoming environment in Fife for Freedom Campers with more choice, guidance and up to date accurate information. It would also address some of the valid concerns raised from those communities most impacted by unregulated Freedom Camping.

In principle, upon application, a permit could be issued on an annual basis covering the peak season as defined by the FCCT and subject to the conditions of use (code of conduct).

Example of some of possible permit conditions:

- The permit remains the property of FCCT and must be produced on the request of an authorised member of staff.
- The availability of designated spaces is not guaranteed, you may have to use another location.
- The permit allows use of designated sites (where byelaws, TROs and management rules are not in use) and when designated spaces are available.
- The permit is not transferable to another vehicle and access is only permitted to designated sites over authorised routes.
- FCCT reserves the right to suspend or cancel a permit, refuse entry to any site or require you to leave without notice and can refuse to grant or renew applications.
- The permit holder enters designated carparks at their own risk and FCCT and Fife Council accepts no liability in respect of accidents, loss or injury arising out of the use of this permission.

The permit in the form of a badge would need to be displayed on the vehicle at all times when on a designated site for the perusal of appointed FCCT staff or other stakeholders if applicable.

Funding would need to be secured for initial set up costs however if a charge was made for the permit it is envisaged that the scheme would become self-financing.

It should be noted that stakeholders may choose to withdraw consent or chose to ignore the protocols in place and therefore the scheme might not always be effective. However, this option could be a reasonable, practical and affordable step to try and address the current challenge.

5.5 Certificated Site

Under the terms of the Caravan and Control of Development Act 1960 it is possible to create additional Certificated Sites that are permitted to accommodate up to 5 caravans or motorhomes, and 10 tents for a maximum of 28 consecutive days at any one time.

Many campsites prefer to operate more static caravans and camping pods and in recent years there has been a reduction in service provision for motorhomes, tourers and tents. To address the demise of the traditional campsite, every effort should be made by Fife Council and its partners to encourage land managers looking to diversify to consider Certified Campsites that could potentially target and accommodate the motorhome community. An example of what can be achieved is the pending campsite with motorhome pitches provided by Silverburn Park (Leven). Ref: Silverburn Camping

The staffing and the new amenities required to adapt selected car parks to this purpose would require significant investment to fulfil the mandatory industry criteria and is therefore perhaps best left to the private sector and relevant third sector organisations to provide.

5.6 Vehicle Access Restriction - Barriers

There are various types of Car Park Barriers used to control operational times at a limited number of car parks and sites in Fife, thus preventing inappropriate vehicle usage. Manual barriers require staff resources to operate. Automatic barriers need an electrical source, ongoing maintenance and are expensive to install.

5.6.1 Height Barriers

By design height barriers restrict/control access to car parks for campervans. However un-targeted larger vehicles, horse boxes, service vehicles and some blue response services can also be restricted access to these sites. Given the universal design of this type of barrier it can discriminate against certain legitimate users who require access.

5.6.2 Rising Barriers

When in use, rising barriers restrict or control access to car parks and are normally made from steel or aluminum to provide a physical barrier which can be operated automatically if an electrical source is available or manually with staff. Though they don't restrict high side vehicles access, they can be problematic as vehicles can get locked in the car parks once the operating hours are over. Rising barriers also require ongoing maintenance coupled with safety checks.

5.6.3 Manual Swing Barriers

Are ideal for locations where traffic flow is fairly low, or where an automated barrier system would not be suitable. They are a cheap alternative to other barriers however they do require an operating regime when in use. One inherent risk is that when a barrier is not secured it can be dangerous if it comes into contact with a moving vehicle.



Image 11 Height Barrier (Pathhead Sands Kirkcaldy)

Given the varied road layouts and approach speeds, the installation of Vehicle Access Restriction – Barriers can in some instances increase the risk of a vehicle accident and therefore may not be suitable for some locations.

6 CONCLUSIONS

Meeting the challenge that comes with excessive Freedom Camping requires stakeholder consultation, realistic solutions and affordable proposals. This report recognises that any proposed solution may not resolve all the current grievances and challenges in relation to Freedom Camping. Only a national-level conversation and a change in legislation could accomplish this.

However, Fife could do more within the parameters of current legislation to lessen the burden on our communities, engage with the motorhome sector and capitalise more on the economic benefits that may come with this type of tourism.

This study has identified 6 potential **Options for Change** that may address the challenges that come with Freedom Camping. It is accepted however that not all will embrace the opportunities associated with this form of tourism. Given the complexities of this issue, it is incumbent on us all to seek perspectives and ideas from all quarters and not just those who have contributed to this report prior to any decisions being taken.

However, we would request that readers of this document take cognisance of the following points in relation to the 6 Proposed Options for Change:

6.1 Introduction of Local byelaws (page 13)

Byelaws legally regulate various activities in Scotland. They are particularly effective in the rail and water industry and are used to prevent trespass on MOD sites, airports, harbours etc. However, to use byelaws to stop or control Freedom Camping could be viewed as rather heavy handed, like using a sledge hammer to crack a nut. It might also send out messages that motorhome visitors are not welcome in Fife. Therefore, it is recommended that the introduction of byelaws for freedom camping should only be used as a last resort, once all other options have been considered.

6.2 Introduction of Consolidation Orders (page 14)

Historically many car parks in Fife had multiple traffic orders that were replaced by an overriding consolidation order. This means that over 140 car parks managed by Transportation Service (Fife Council) have undergone the full Notification and Legal Process and now form part of a Legal Order which is enforceable. These car parks very rarely experience issue in relation to motorhomes.

The introduction of TROs at additional problematic sites may move the challenge to another area. As such, this is not a solution FCCT would advocate for as a first option. In addition to this, Fife Council's Transportation Service may no longer have the capacity to introduce further consolidation orders.

6.3 Introduction Vehicle Access Restriction – Barriers (page 18)

Barriers by their design prevent inappropriate access to car parks and sites at the discretion of the site owner/operator. Though cheap to install they require operation and maintenance by staff at key times and may inadvertently restrict access to other legitimate users.

The placement of barriers at some locations can pose an unnecessary risk to users. Therefore, the introduction of barriers may not address the challenge that comes with Freedom Camping. This report recommends that barriers are only used to prevent vehicle access as and when required and not as a means to control motorhome use.

6.4 Introduction of Parking Charge Notices (page 15)

The introduction of a Parking Charge Notice (PCN) scheme could help control all forms of parking including Freedom Camping on **Unregulated Public Car Parks** with a potential to create an ongoing revenue stream at suitable sites for a trial period. If a fee was introduced for long term parking with an initial 2 hours grace period (no charge) then affordable charging could be deemed as appropriate and fair for the majority of users.

Suitable trial car parks could accommodate up to 5 designated bays for the provision of safe overnight parking of motorhomes at an agreed cost. In the event that a vehicle owner/operator breached any terms and conditions of the contract then a Parking Charge Notice (Invoice) could be issued. E.g. parking a motorhome out with a designate bay overnight and not paying a fee for staying over 2 hours.

If this proposal was adopted, FCCT would advocate that any income generated from car park charges after staffing and other related costs be used for the management of the associated carparks. This revenue could suplement the limited annual funding currently received from Fife Council.

A PCN scheme would require additional financial investment for parking meters and signage and to designate parking bays. Overnight charging may still move the challenge to another location.

6.5 Introduction of Freedom Parking - Permit Scheme (page 16)

Creating a welcoming environment for visitors and residents with more choice, guidance, facilities and up to date accurate information is a shared objective for us all. The Freedom Parking Permit Scheme has the potential to achieve this outcome.

Although it is a relatively simple idea, the introduction of the scheme cannot be achieved over a short period of time as motorhome usage in Fife requires an overarching strategy, encompassing the whole of Fife rather than taking a piecemeal approach.

Delivering it would require a dedicated project officer for community engagement, information sharing, coordination, operating systems and the infrastructure required to make it work. Temporary funding would be required to fulfil this objective by covering initial capital set up costs and officer time.

This long-term strategy will not then address the short-term challenges that some of the current Unregulated Public Car Parks are experiencing.

6.6 Introduction of Certificated Site (page 17)

Historically the provision of municipal campsites was undertaken by many local authorities. This report suggests that the provision of certified campsites should be left

to the private and third sector who have the resources, means and focus to deliver such a service.

The certified campsite scheme is specifically designed for small holdings, private gardens, farms or pubs that are required to provide potable drinking water and toilet waste disposal points as a minimum prerequisite. This report recognises that our sites do not currently have the infrastructure or the staff resources necessary to provide such a service and therefore this is an unachievable objective.

However, every effort should be made to encourage this idea for those that can provide affordable campsite facilities in Fife.

7 RECOMMENDATIONS

Freedom Camping is now a popular choice for many who chose to visit Fife. Unregulated car parks have evolved into hybrid car park/camp sites at peak periods (April – October) however many of the locations in Fife were never designed for high levels of overnight motorhome usage. This report has identified the need to make our car parks safer and posits that all reasonable and practical measures must be taken to reduce the risk for all users. However, Freedom Camping is not just a challenge but also an opportunity to promote sustainable tourism and maximise the potential benefits to our local economy.

For Freedom Camping to be sustainable, it is no longer a viable option to continue with overnight motorhome usage free of charge in unregulated public car parks in Fife. Therefore, this report recommends the introduction of a modest charging structure to help facilitate the sustainable development of this leisure activity on key **Unregulated Public Car Parks** in Fife. Income generated after operational cost (including staffing, maintenance & administration) must be re-invested back into the relevant site for facility improvements, or immediate locality once the facility is of a high standard.

7.1 Elie Ruby Bay - Parking Charge Notice

The safety concerns highlighted at **Elie Ruby Bay** require to be addressed without delay and therefore the introduction of a trial **Parking Charge Notice** system with 5 dedicated overnight parking motorhome bays for this location is recommended to help facilitate safe access in the short-term. Fife Coast & Countryside Trust would be willing to implement the proposed scheme if funding can be secured to introduce it. If shown to be financially sustainable, this model could possibly be introduced in other locations over time.

It is therefore proposed that the following pricing structure is introduced at Elie Ruby Bay:

•	1 st November - 28 th February	£0.00	
•	1st April - 31st October (2 hours or less)	£0.00	
•	1st April - 31st October (2 hour to 4 hours)	£1.00	
•	1st April – 31st October (4 hours or more, within 1 day)	£2.00	
•	All Year Round (Overnight Motorhome Parking)	£10.00	per night
•	Annual vehicle permit (cars only)	£10.00	
•	Failure to comply with displayed car park rules	£60.00	

The **primary function** of a PCN operation at Elie Ruby Bay shall be to control safe and acceptable levels of Freedom Camping. The **secondary function** would be income generation for staffing with associated costs and reinvestment into sites required for future use. A PCN car park scheme for Elie Ruby Bay would incur the following set up costs:

•	Membership of the British Parking Association (Annual)	£700	
•	Ticketing systems	£4000	
•	Car park signage (Guidance and Rules)	£2000	
•	5 Designated bays (Overnight Parking for Motorhomes)	£2500	
•	Surface regrade of car parks	£5000	(Indicative)
•	Cost recovery	£1000	

Total Cost £15,200 (indicative)

To make recommendations to Fife Council and other stakeholders to see if the scheme has the potential for the roll out to other sites, FCCT would require to put in place robust operating procedures covering implementation, ongoing operation and to regularly review and report on the progress of the scheme over a 12 month period.

7.2 Kingsbarns - Signage & Zoning

The car park at Kingsbarns is leased by Fife Council from Cambo Estate on an annual rolling basis. The site has been audited for Motorhome usage since 2015 (appendix 3) and there is a need to take immediate action in relation to the unacceptably high number of Freedom Campers at Kingsbarns.

It is proposed that robust signage with parking rules permitting up to 8 overnight safe parking spaces for motorhomes at dedicated safe spaces within the car park. Though not a campsite, it could comply with industry guidance at night times e.g. 6 metres apart to prevent the potential spread of fire.

This would be a cost-effective method of verifying authorisation and sustainably facilitating Freedom Camping but this report recognizes that its success relies heavily on the principle of common consent.

FCCT can pay for and install the signage required for regulations and zoning and can implement operating procedures while reviewing the progress of the scheme over a 12 month period, reporting on its findings. It is proposed that there would be no charge for car parking at this site but a request for a £10 donation fee for overnight motorhome parking.

7.3 Craigmead - Signage & Zonation

This car park is operated by FCCT on behalf of Fife Council and has a steady level of Freedom Camping. It is proposed for this site that we put in place a similar system as that proposed for Kingsbarns but with a secure collection box requesting an overnight parking donation fee for Motorhomes of £10. FCCT would cover the costs for signage and review the progress of the scheme over a 12 month period then report on its findings. As with Kingsbarns its success relies heavily on the principal of common consent.

7.4 Overarching Motor Strategy for Fife

Fife requires an overarching strategy, encompassing the whole of Fife rather than the current piecemeal approach in relation to a Motorhome Strategy for Fife. This would require a dedicated project officer for this purpose (FC6/FC7).

The **Freedom Parking - Permit Scheme (page 16)** could only be achieved **Fife** wide with the employment of dedicated resources. In the long-term it may prove to be the best solution to the challenges and opportunities associated with Motorhome holidays in Fife. However we propose this is not considered until FCCT report back on the proposed pilot schemes for:

- Elie Ruby Bay (Parking Charge Notice)
- Kingsbarns (Signage & Zonation)
- Craigmead (Signage, Zonation & Donations)

7.5 Gather Data

A pilot scheme provides the opportunity to undertake market research so as to establish potential for expanding the proposals beyond the initial sites. If successful, revenues may be such that they cover ongoing maintenance not only for the immediate site, but also at other relevant locations.

7.6 Elsan Disposal Point

A Scottish led multi agency group is due to report in the New Year (2020) on guidance and best practice for Elsan Disposal Points and it is anticipated that the report shall be used for the most up-to-date advice in relation to the installation and management for such facilities.

This paper advocates the installation of self-funding Elsan Disposal Point (self-contained and double skinned) at Elie Ruby Bay, Kingsbarns and the Craigmead locations.

8 CONSULTATION and IMPLEMENTATION

The process would involve listening to and taking careful account of the views of all relevant stake holders. It is essential that consultation take place before any decisions are made in relation to the recommendations. This can be achieved with online surveys, liaising with relevant Fife Council Departments, Community Councils, FCCT, CAMPA and BPA and all other relevant stakeholders.

8.1 Elie Ruby Bay

As the proposals for Elie Ruby Bay make a recommendation away from free parking to a modest parking fee that will include formal consent for the limited overnight motorhome parking under the pretense of contract law. This report recommends that a 4 week consultation process is undertaken in the new year (January 2020).

8.2 Kingsbarns Beach Car Park

As the proposals for Kingsbarns Beach Car park make a recommendation that will include written consent for limited free overnight motorhome parking, this report recommends that a 4 week consultation process is undertaken in the new year (January 2020).

8.3 Craigmead Car Park

As the proposals for Craigmead Car Park made a recommendation that will include written consent for limited free overnight motorhome parking, requesting a donation this report recommends that a 4 week consultation process is undertaken in the new year (January 2020).

8.4 Implementation

At the end of the consultation of these proposals if deemed appropriate they could be implemented for the start of April 2020 if funding is secured.

9 APPENDICES

Appendix 1 - PowerPoint Presentation

Legalities and management of tents, camping vans and caravans



Scotland's access legislation means that everyone can go camping wherever access rights apply, as long as it's done responsibly.







Slide 1

Popular Locations:



- St Andrews, West Sands
- Kingsbarns
- Guardbridge Eden Centre
- Elie Ruby Bay
- Craigmead Carpark
- East Lomond Carpark
- Cellerdyke



Slide 2

St Andrews West Sands:



A daily record was made of the number of campervan / caravan overnights stays from the 21^{st} March – 28^{th} August 2016 by the FCCT litter maintenance team:

- 879 overnight stays recorded
- 26 campervans / caravans recorded on the 13th August 2016
- Total overnight stays for August 2016 was 290
- Average <u>local Campsite</u> site fees £26.50

879 overnight stays equates to £23,293 lost income to campsites in the St Andrews locality

Slide 3

The Hidden Costs:



Based on the average of 2 occupants staying overnight during August 2016:

- Increased household waste equates to 200 black bags of rubbish
- St Andrews block 1 and 2 public toilets used an additional 580 times*
- · Council, FCCT and Links trust staff time
- Subsidised by the tax payer

Defecation is the final act of digestion, by which humans eliminate solid st

Slide 4

The Environmental Costs:



- Overflowing Bins
- Chemical Disposal Point (Not Available)
- Inappropriate transport use of unadopted roads and access points
- Unnecessary Burden on land owners
- Negative impact on flora and fauna
- Health & Safety Implications
- Designation issues

Slide 5

The Solution:



- A better understanding of SOAC (for everyone)
- Opportunity for income generation
- Overnight charging fees
- Bylaws
- Engineer the problem out

Slide 6

The Solution:



- A better understanding of SOAC (for everyone)
- Opportunity for income generation
- Overnight charging fees
- Bylaws
- Engineer the problem out
- Work with industry and service users (<u>CAMPA</u>)



Slide 7

Appendix 2 - Unpermitted Overnight Stay Records (West Sands)

West Sands 2015

Date	No of Vehicles								
4-Apr-15	4	c/fwd	171	c/fwd	316	c/fwd	476	c/fwd	753
5-Apr-15	15	3-May-15	11	13-Jun-15	8	26-Jul-15	4	21-Sep-15	6
6-Apr-15	16	4-May-15	6	14-Jun-15	10	27-Jul-15	4	22-Sep-15	1
7-Apr-15	7	8-May-15	1	1-Jun-15	1	28-Jul-15	4	23-Sep-15	1
8-Apr-15	4	9-May-15	4	6-Jun-15	12	30-Jul-15	4	24-Sep-15	1
9-Apr-15	3	10-May-15	3	7-Jun-15	14	31-Jul-15	7	25-Sep-15	2
10-Apr-15	6	11-May-15	2	15-Jun-15	3	1-Aug-15	8	28-Sep-15	5
11-Apr-15	6	12-May-15	2	16-Jun-15	3	2-Aug-15	4	29-Sep-15	4
12-Apr-15	10	13-May-15	2	17-Jun-15	3	10-Aug-15	58	30-Sep-15	3
13-Apr-15	1	15-May-15	4	18-Jun-15	7	11-Aug-15	56	1-Oct-15	4
14-Apr-15	3	16-May-15	13	19-Jun-15	1	12-Aug-15	6	2-Oct-15	4
15-Apr-15	3	17-May-15	11	20-Jun-15	8	13-Aug-15	6	4-Oct-15	6
16-Apr-15	6	18-May-15	4	21-Jun-15	15	14-Aug-15	7	5-Oct-15	2
17-Apr-15	9	19-May-15	3	6-Jul-15	4	15-Aug-15	8	6-Oct-15	2
18-Apr-15	6	20-May-15	3	7-Jul-15	5	16-Aug-15	11	9-Oct-15	5
19-Apr-15	5	21-May-15	2	8-Jul-15	2	25-Aug-15	3	12-Oct-15	10
20-Apr-15	5	22-May-15	6	9-Jul-15	2	26-Aug-15	5	13-Oct-15	3
21-Apr-15	1	23-May-15	8	10-Jul-15	5	27-Aug-15	3	16-Oct-15	1
22-Apr-15	1	24-May-15	15	22-Jun-15	4	28-Aug-15	4	22-Oct-15	1
23-Apr-15	2	25-May-15	9	23-Jun-15	2	29-Aug-15	10		
25-Apr-15	4	26-May-15	6	24-Jun-15	2	30-Aug-15	9		
26-Apr-15	9	27-May-15	5	25-Jun-15	2	31-Aug-15	5		
11-May-15	2	28-May-15	6	26-Jun-15	5	01-Sep-15	2		
12-May-15	2	29-May-15	3	27-Jun-15	8	02-Sep-15	2		
13-May-15	2	30-May-15	3	29-Jun-15	13	03-Sep-15	11		
15-May-15	4	31-May-15	6	17-Jul-15	6	05-Sep-15	5		
16-May-15	13	8-Jun-15	1	22-Jul-15	3	06-Sep-15	16		
17-May-15	11	8-Jun-15	1	23-Jul-15	4	15-Sep-15	5		
27-Apr-15	2	9-Jun-15	3	24-Jul-15	5	16-Sep-15	2		
2-May-15	9	12-Jun-15	2	25-Jul-15	3	17-Sep-15	8		
	171		316		476		753		814

West Sands 2016

Date ,	No of Vehicles	Date	No of Vehicles						
21-Mar-16	15	c/fwd	129	c/fwd	242	c/fwd	422	c/fwd	746
22-Mar-16	13	9-May-16	5	10-Jun-16	1	16-Jul-16	10	15-Aug-16	11
28-Mar-16	12	10-May-16	1	11-Jun-16	5	17-Jul-16	17	16-Aug-16	10
31-Mar-16	2	11-May-16	1	12-Jun-16	7	18-Jul-16	3	17-Aug-16	7
1-Apr-16	4	12-May-16	2	13-Jun-16	5	19-Jul-16	6	18-Aug-16	12
2-Apr-16	10	13-May-16	3	16-Jun-16	1	20-Jul-16	5	19-Aug-16	3
3-Apr-16	4	14-May-16	5	20-Jun-16	4	21-Jul-16	3	20-Aug-16	10
5-Apr-16	3	15-May-16	11	21-Jun-16	5	22-Jul-16	13	21-Aug-16	6
7-Apr-16	1	16-May-16	1	22-Jun-16	4	23-Jul-16	12	22-Aug-16	7
9-Apr-16	5	17-May-16	3	24-Jun-16	4	24-Jul-16	18	23-Aug-16	4
10-Apr-16	2	18-May-16	2	25-Jun-16	10	25-Jun-16	8	24-Aug-16	8
11-Apr-16	2	19-May-16	1	26-Jun-16	15	26-Jul-16	4	25-Aug-16	13
14-Apr-16	1	21-May-16	6	27-Jun-16	7	28-Jul-16	12	26-Aug-16	4
15-Apr-16	1	22-May-16	5	28-Jun-16	8	29-Jul-16	8	27-Aug-16	14
16-Apr-16	2	23-May-16	2	29-Jun-16	6	30-Jul-16	20	28-Aug-16	24
25-Apr-16	1	24-May-16	1	30-Jun-16	8	31-Jul-16	18	29-Aug-16	8
26-Apr-16	2	25-May-16	2	1-Jul-16	7	1-Aug-16	18	30-Aug-16	9
29-Apr-16	2	26-May-16	3	2-Jul-16	8	2-Aug-16	12	31-Aug-16	9
30-Apr-16	3	27-May-16	4	3-Jul-16	6	3-Aug-16	12	1-Sep-16	11
1-May-16	5	28-May-16	4	4-Jul-16	10	4-Aug-16	4	2-Sep-16	5
20-Apr-16	2	29-May-16	6	5-Jul-16	6	5-Aug-16	12	5-Sep-16	7
21-Apr-16	4	30-May-16	6	6-Jul-16	3	6-Aug-16	9	7-Sep-16	3
22-Apr-16	1	31-May-16	4	8-Jul-16	5	7-Aug-16	7	8-Sep-16	7
23-Apr-16	4	1-Jun-16	3	9-Jul-16	10	8-Aug-16	9	9-Sep-16	6
24-Apr-16	6	2-Jun-16	6	10-Jul-16	14	9-Aug-16	7	13-Sep-16	1
2-May-16	7	3-Jun-16	1	11-Jul-16	9	10-Aug-16	11	15-Sep-16	1
3-May-16	1	4-Jun-16	9	12-Jul-16	3	11-Aug-16	10	16-Sep-16	4
4-May-16	1	5-Jun-16	11	13-Jul-16	4	12-Aug-16	12	19-Sep-16	6
7-May-16	6	6-Jun-16	4	14-Jul-16	1	13-Aug-16	26	20-Sep-16	6
8-May-16	7	8-Jun-16	1	15-Jul-16	4	14-Aug-16	18	23-Sep-16	2
	129		242		422		746		964

West Sands 2017

Date	No of Vehicles						
2-Apr-17	7	c/fwd	90	c/fwd	180	c/fwd	538
3-Apr-17	2	18-May-17	1	11-Jul-17	2	17-Aug-17	5
5-Apr-17	2	20-May-17	5	13-Jul-17	1	19-Aug-17	4
6-Apr-17	1	21-May-17	9	14-Jul-17	2	20-Aug-17	6
7-Apr-17	2	22-May-17	7	15-Jul-17	2	21-Aug-17	3
8-Apr-17	2	24-May-17	2	16-Jul-17	8	22-Aug-17	4
9-Apr-17	8	25-May-17	1	17-Jul-17	1	23-Aug-17	12
10-Apr-17	5	26-May-17	2	18-Jul-17	3	24-Aug-17	2
11-Apr-17	4	27-May-17	3	19-Jul-17	6	26-Aug-17	7
12-Apr-17	1	28-May-17	10	20-Jul-17	3	27-Aug-17	5
13-Apr-17	1	29-May-17	4	22-Jul-17	3	28-Aug-17	3
14-Apr-17	2	3-Jun-17	1	23-Jul-17	3	29-Aug-17	2
15-Apr-17	3	4-Jun-17	1	24-Jul-17	4	30-Aug-17	1
16-Apr-17	3	11-Jun-17	4	26-Jul-17	1	31-Aug-17	2
17-Apr-17	1	12-Jun-17	1	28-Jul-17	1	1-Sep-17	1
19-Apr-17	4	13-Jun-17	2	29-Jul-17	4	3-Sep-17	1
22-Apr-17	1	18-Jun-17	9	30-Jul-17	5	5-Sep-17	1
23-Apr-17	2	19-Jun-17	2	1-Aug-17	3	11-Sep-17	2
24-Apr-17	2	20-Jun-17	3	2-Aug-17	7	13-Sep-17	1
26-Apr-17	2	21-Jun-17	2	3-Aug-17	3	14-Sep-17	1
28-Apr-17	1	22-Jun-17	1	5-Aug-17	2	15-Sep-17	2
29-Apr-17	4	24-Jun-17	1	7-Aug-17	5	18-Sep-17	1
30-Apr-17	6	25-Jun-17	1	8-Aug-17	2	19-Sep-17	1
1-May-17	4	30-Jun-17	5	9-Aug-17	13	22-Sep-17	1
4-May-17	1	2-Jul-17	2	11-Aug-17	84	28-Sep-17	1
7-May-17	8	3-Jul-17	1	12-Aug-17	81	3-Oct-17	1
9-May-17	3	5-Jul-17	1	13-Aug-17	85	6-Oct-17	1
10-May-17	2	8-Jul-17	4	14-Aug-17	6	9-Oct-17	2
14-May-17	3	9-Jul-17	4	15-Aug-17	11		
17-May-17	3	10-Jul-17	1	16-Aug-17	7		
	90		180		538		611

Appendix 3 - Unpermitted Overnight Stay Records (Kingsbarns)

Date	No of Vehicles	Date	No of Vehicles
13-Jun-15	2	b/fwd	57
16-Jun-15	1	11-Aug-15	1
18-Jun-15	1	12-Aug-15	1
1-Jun-15	3	13-Aug-15	2
2-Jun-15	1	14-Aug-15	1
3-Jun-15	3	16-Aug-15	3
4-Jun-15	1	26-Aug-15	1
6-Jun-15	6	28-Aug-15	1
7-Jun-15	3	15-Sep-15	1
6-Jul-15	2	25-Sep-15	1
7-Jul-15	1	5-Oct-15	1
8-Jul-15	1	13-Oct-15	2
9-Jun-15	2		
11-Jul-15	1		
22-Jun-15	1		
24-Jun-15	1		
13-Jul-15	1		
17-Jul-15	2		
18-Jul-15	2		
20-Jul-15	4		
21-Jul-15	2		
24-Jul-15	1		
26-Jul-15	3		
27-Jul-15	1		
28-Jul-15	1		
29-Jul-15	1		
30-Jul-15	3		
31-Jul-15	1		
1-Aug-15	4		
2-Aug-15	1		
	57		72

Date	No of Vehicles	Date	No of Vehicles	Date	No of Vehicles
30-Mar-16	1	b/fwd	41	b/fwd	102
1-Apr-16	2	29-Jun-16	1	12-Aug-16	3
2-Apr-16	1	1-Jul-16	2	13-Aug-16	2
7-Apr-16	1	2-Jul-16	2	14-Aug-16	5
8-Apr-16	1	3-Jul-16	1	15-Aug-16	5
10-Apr-16	1	9-Jul-16	2	16-Aug-16	4
11-Apr-16	2	10-Jul-16	1	17-Aug-16	4
28-Apr-16	1	11-Jul-16	1	18-Aug-16	7
30-Apr-16	1	12-Jul-16	1	22-Aug-16	2
18-Apr-16	1	13-Jul-16	1	23-Aug-16	1
19-Apr-16	2	14-Jul-16	1	24-Aug-16	1
20-Apr-16	2	15-Jul-16	5	25-Aug-16	2
10-May-16	1	16-Jul-16	6	27-Aug-16	4
13-May-16	1	17-Jul-16	4	28-Aug-16	3
14-May-16	1	19-Jul-16	3	30-Aug-16	1
21-May-16	2	21-Jul-16	3	1-Sep-16	2
23-May-16	1	22-Jul-16	1	2-Sep-16	2
24-May-16	1	23-Jul-16	2	5-Sep-16	1
25-May-16	2	26-Jul-16	1	8-Sep-16	1
28-May-16	3	27-Jul-16	5	9-Sep-16	2
29-May-16	3	28-Jul-16	1	12-Sep-16	2
31-May-16	1	29-Jul-16	2	13-Sep-16	2
2-Jun-16	1	30-Jul-16	2	16-Sep-16	1
4-Jun-16	1	2-Aug-16	3	19-Sep-16	3
15-Jun-16	1	3-Aug-16	2	20-Sep-16	2
18-Jun-16	1	4-Aug-16	3		
24-Jun-16	1	5-Aug-16	1		
25-Jun-16	2	9-Aug-16	1		
26-Jun-16	1	10-Aug-16	1		
27-Jun-16	1	11-Aug-16	2		
	41		102		164

Date	No of Vehicles						
3-Apr-17	1	b/fwd	53	b/fwd	134	b/fwd	203
4-Apr-17	1	20-May-17	1	27-Jun-17	2	12-Aug-17	1
6-Apr-17	1	21-May-17	3	30-Jun-17	2	13-Aug-17	5
7-Apr-17	1	22-May-17	3	3-Jul-17	4	14-Aug-17	3
8-Apr-17	3	23-May-17	5	5-Jul-17	1	15-Aug-17	3
10-Apr-17	2	24-May-17	4	6-Jul-17	2	16-Aug-17	1
11-Apr-17	1	25-May-17	2	7-Jul-17	1	17-Aug-17	5
12-Apr-17	1	26-May-17	2	8-Jul-17	1	19-Aug-17	4
13-Apr-17	1	27-May-17	3	10-Jul-17	2	20-Aug-17	6
14-Apr-17	1	28-May-17	2	12-Jul-17	3	21-Aug-17	1
15-Apr-17	5	29-May-17	1	13-Jul-17	2	24-Aug-17	2
16-Apr-17	1	31-May-17	2	14-Jul-17	3	25-Aug-17	3
17-Apr-17	2	1-Jun-17	3	15-Jul-17	4	26-Aug-17	4
18-Apr-17	1	3-Jun-17	10	16-Jul-17	4	27-Aug-17	4
19-Apr-17	1	4-Jun-17	10	17-Jul-17	2	28-Aug-17	2
23-Apr-17	3	8-Jun-17	1	18-Jul-17	7	29-Aug-17	2
29-Apr-17	1	9-Jun-17	1	20-Jul-17	2	30-Aug-17	1
30-Apr-17	2	10-Jun-17	2	21-Jul-17	2	31-Aug-17	4
1-May-17	3	11-Jun-17	2	22-Jul-17	2	1-Sep-17	2
7-May-17	2	12-Jun-17	1	23-Jul-17	3	11-Sep-17	1
8-May-17	1	13-Jun-17	3	24-Jul-17	2	12-Sep-17	2
9-May-17	3	15-Jun-17	2	27-Jul-17	1	13-Sep-17	1
10-May-17	2	16-Jun-17	1	28-Jul-17	1	14-Sep-17	1
11-May-17	2	17-Jun-17	5	29-Jul-17	2	15-Sep-17	2
12-May-17	3	19-Jun-17	2	6-Aug-17	1	18-Sep-17	1
13-May-17	2	20-Jun-17	1	7-Aug-17	2	21-Sep-17	3
14-May-17	3	23-Jun-17	1	8-Aug-17	3	22-Sep-17	1
16-May-17	1	24-Jun-17	2	9-Aug-17	5	27-Sep-17	1
17-May-17	1	24-Jun-17	4	10-Aug-17	2	28-Sep-17	1
19-May-17	1	26-Jun-17	2	11-Aug-17	1	6-Oct-17	1
	53		134		203		271

Date	No of Vehicles	Date	No of Vehicles
31-Mar-18	1	b/fwd	86
1-Apr-18	1	23-May-18	3
7-Apr-18	1	24-May-18	3
8-Apr-18	4	26-May-18	4
9-Apr-18	2	27-May-18	5
15-Apr-18	5		
18-Apr-18	1		
19-Apr-18	4		
21-Apr-18	2		
22-Apr-18	7		
23-Apr-18	1		
27-May-18	2		
28-Apr-18	4		
5-May-18	1		
30-Apr-18	2		
7-May-18	2		
8-May-18	2		
9-May-18	3		
9-May-18	1		
11-May-18	1		
12-May-18	3		
13-May-18	3		
14-May-18	2		
15-May-18	3		
16-May-18	2		
17-May-18	4		
18-May-18	1		
19-May-18	15		
20-May-18	5		
21-May-18	1		
	86		101

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