

Report to the Cabinet

Meeting to be held on Thursday, 7 March 2024

Report of the Director of Highways and Transport

Part I

Electoral Divisions affected:
Lytham; St Annes North; St
Annes South;

Corporate Priorities:
Delivering better services;

**Lancashire County Council (Various Roads, Lytham St Annes, Fylde Borough)
(Motor Caravan Restricted Waiting, Bus Only Limited Waiting and Various
Parking Restrictions) Order 202***

(Appendices 'A' to 'I' refer)

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Brief Summary

Following investigations and formal public consultation it is proposed to make a Traffic Regulation Order to introduce a Restriction of Motor Caravan Parking from 6pm to 8am.

The proposal further makes amendments to the current time limit parking along the promenade and introduces a dedicated Bus drop off/pick up Bay to accommodate visiting coach parking along with No Waiting and No Loading restrictions to address potential road safety issues.

This is deemed to be a Key Decision and the requirements of Standing Order C19 have been complied with.

Recommendation

Cabinet is asked to approve the proposals for new and existing restrictions on the various lengths of road as detailed within this report and as set out in the Draft Order at Appendix 'C', for the reasons outlined in the Statement of Reasons at Appendix 'G'.



Detail

The Borough of Fylde is a coastal district, which has a rich and varied natural and built environment enjoyed by both residents and visitors alike. This provides a high quality of life for residents and an attractive location for business and commerce as well as promoting a vibrant and prosperous visitor economy.

Fylde's coastline begins at Starr Gate and includes St Anne's amenity beach and dunes, Promenade Gardens including St Anne's Pier and the Island site, Fairhaven Marine Lake and Gardens, Lytham Green and the rural areas of Warton, Freckleton and Clifton, leading to the Borough boundary at Savick Brook adjacent to the Preston City Council area.

Fylde Borough Council is currently embarking upon the development of a Coastal Strategy to designate and develop the whole of its coastal fringe. The purpose of the Fylde Coastal Strategy initiative is to develop a 16-year vision for the collation and coordination of all current strategies and policy objectives for green infrastructure and landscape, coastal protection, water quality, nature conservation, habitat improvement, conservation of the built and natural heritage, culture, the visitor economy, access and transportation, and also develop high level actions to address the major issues affecting the Fylde coast.

The Biological Heritage Site and the Site of Special Scientific Interest along Lytham St Annes promenade are shown at Appendix 'I' and the full Fylde Borough Council Coastal Strategy is available on the borough council's website at: <https://new.fylde.gov.uk/council/coastal-strategy/>.

Councillors in wards where the promenade runs through have reported for many years complaints from residents about the cumulative visual impact of motor caravans, the impact on parking provision for residents and other visitors and the antisocial behaviour of a minority of motor caravan users including setting out on footpaths, disposal of liquid waste down drains and emptying of liquid waste in park areas along the promenade.

It is proposed to make a Traffic Regulation Order to introduce measures to prevent anti-social overnight parking by Motor caravans by introducing a restriction of waiting for Motor caravans 6pm to 8am whilst still providing car parking for residents and visitors to the area as shown on the plans at Appendices 'E' and 'F'.

The proposal further makes the following changes as shown on the plans at Appendix 'D'.

- Proposal to change the current 18-hour Limited Waiting on Inner Promenade to 4-hours and extends the current 2-hour Limit Waiting on South Promenade to ensure a turnover of available on-street parking options.
- Proposal to introduce No Waiting and No Loading restrictions to address potential road safety issues.
- Proposal to introduce a dedicated Bus drop off/pick up bay to accommodate visiting coach parking.



- Correcting inconsistencies within the current Traffic Regulation Order to clarify and simplify the order to correctly reflect the restrictions as they are marked out on site with no material change.

There are a variety of different sectors of the tourist industry, Motor caravans being one of them. The proposals attempt to balance the needs of several sectors of tourism with Lytham St Annes.

Appendices

Appendices 'A' - 'I' are attached to this report. For clarification they are summarised below and referenced at relevant points within this report.

Appendix	Title
Appendix 'A'	Draft Order
Appendix 'B'	Modification Notice
Appendix 'C'	Modified Draft Order
Appendix 'D'	Plans relating to changes to Time Limited Waiting and general Parking restriction
Appendix 'E'	Plans relating to the proposed Restriction of Motor caravan parking 6pm-8am
Appendix 'F'	Plans relating to the Modification
Appendix 'G'	Full Statement of Reasons for all proposals
Appendix 'H'	Traffic Signs policy review area wide authorisation for Motor caravan signs
Appendix 'I'	Biological Heritage Site and the Site of Special Scientific Interest Plans

Consultations

Formal consultation was carried out between 12 October 2023 and 9 November 2023 which included advertising in the local press and notices being displayed on site. Divisional county councillors were consulted along with the council's usual consultees and the consultation documents posted on the council's website.

Notices were not placed at the locations of the existing restrictions where no material change to the restrictions as currently indicated on site are proposed.

Having considered the consultation responses, modifications to the advertised proposals were advertised between 7 December 2023 and 4 January 2024. Details of this consultation are contained within Appendices 'B' and 'F' and have the following effects:

- To include the two main roads around Lowther Gardens that face onto open spaces along with St Paul's Avenue near to the AKS school in the proposal for introducing a Restriction of Motor caravans 6pm to 8am, with the intention of mitigating the concerns raised by residents.



Objections

As a result of both consultations 353 Responses were received. The comments regarding the items in the proposed order are detailed as follows along with the engineer's comments as they are relevant:

General Responses

Two responses were received regarding the legality of making and signing the proposals as follows:

Objection on the grounds of the Statement of Reasons

One objector stated that the statement of reasons for the order does not hold any justifiable effect of purpose or weight in safety terms. They believe it is completely contradictory to its stated aim which falls outside of the intended purpose of the Road Traffic Regulation Act and its reasonable use and application to serve the public and administer road safety.

The main points raised by the objector are as follows:

- The order seeks to stop a particular type of vehicle and introduce permission for a substantially larger type of vehicle which as a fact will have a greater impact on the environment, public safety and the highway. Simply replacing one for a worse other.
- Constriction or dispersion of this volume of Motor caravans from the proposed locations will only result in them seeking alternative street parking elsewhere irrespective of any dedicated facilities provided for by the council.
- The proposals are a clear abuse of the act, the power of office given to Lancashire County Council and by the local councillors, who they believe openly advocate the unencumbered parking on open spaces such as the flat grassed dune areas in St Anne's and more importantly Lytham Green to facilitate things such as Lytham festival and other events, clearly in itself flies in the face of the intended proposals the stated reasons and every safety and environmental consequence.

The objector further states that they believe the suggestion of anti-social parking by Motor caravans is absolutely preposterous, given that the parking of any vehicle cannot be antisocial in itself unless it causes obstruction or blocks a right of way. They believe that only the conduct of a person in control of any vehicle can be anti-social, which they believe can be and should be dealt with by the correct authority, on the ground, not the Road Traffic Regulation Act.

Officer's Comments

The Road Traffic Regulation Act allows the council to introduce Traffic Regulation Orders for a variety of reasons. In this case the proposed order falls into items (a), (c) and (f) of the reasons set out under Section 1 of the Road Traffic Regulation Act 1984. As such, it is argued that this is not a clear abuse of the legislation.



The proposed order includes several restrictions which are covered by the reasons set out above. The objector's main issues are in relation to the prohibition of motor caravans for which the council primarily rely upon reasons (c) and (f). Whilst it is agreed that the parking of a vehicle cannot be an anti-social in itself, these comments have been included to provide background to the numerous complaints that both the district and county council have received regarding the use of the highway as a campsite by motor caravans. This in itself is affecting the amenity of the area which the road runs through as well as facilitating passage of traffic.

It is of note that the areas concerning the proposed order are either close to or immediately adjacent to both the Lytham Foreshore Dunes and Saltmarsh, which is a Biological Heritage Site and the Ribble Estuary, a Site of Special Scientific Interest. Both sites are sufficiently proximate and protected that the requirements, particularly in Section 1(f) of the Road Traffic Regulation Act 1984 is satisfied.

Further there is no evidence that the only result in relation to the proposed Order is that Motor caravans will seek alternative street parking elsewhere.

The comments regarding the parking of vehicles to facilitate such things as Lytham Festival are noted, however this event is held in a different location which has an extensive Temporary Traffic Regulation Order placed on it for the duration of the event which seeks to manage the surrounding street. Therefore, it has no relevance to this proposal.

Objection on the Grounds of the Signing of the Restriction of Motor caravans

One item of correspondence was received on the grounds that Lancashire County Council is only permitted to use a sign on the public highway if it is a sign which is authorised in the Traffic Signs Regulations and General Directions 2016 and that whilst the regulations allow words to be added to the sign to indicate exceptions to that prohibition it does not permit any other prohibitive wording, such as the words "Motor caravans" to be added to it.

Officer's Response

The correspondent's comment regarding the use of signs on the highway has been noted, however, although the Traffic Signs Regulations and General Directions 2016 does not permit the prohibitive wording such as "Motor caravans" to be added to the signs, special authorisation has been obtained from the Department for Transport for approval to use a non-standard traffic sign as below:

The Road Traffic Regulation Act 1984 – Sections 64 and 65 Authorisation of Traffic Signs and Special Directions GT50/064/0024 Paragraph 8 authorises the erection of the traffic sign references "Authorised Sign R" Contained in Appendix 'H'.

A number of the responses also requested consideration of introducing 'Resident Only Parking' schemes in and around Lytham St Annes.



The main points raised by the respondents are as follows:

- The correspondents state that Lytham St Annes is a Victorian town with narrow streets and severe parking problems, with emergency vehicles already struggling with access. The correspondents believe that the proposals will result in the Motor caravans migrating to the roads leading off the promenade rather than using the allocated car parks, causing parking and anxiety issues for residents. The correspondents request that consideration be given to include Lytham and St Anne's town centre streets into the proposals. The correspondents also believe that the whole parking situation in Lytham requires a review and 'Resident Only Parking' introduced within a certain distance from the centre of both Lytham and St Anne's, the same as around Westby Street and Cleveland Road.
- That as a consequence of the proposals, Motor caravans and other traffic will simply move on to residential streets which are not well lit and nowhere near wide enough to cope with the increase of traffic. This will result in more congestion in the town, be very intrusive to residents and a danger to children playing out. The correspondents believe that to ensure Motor caravans do not simply move onto the residential side roads a 'Resident Only Permit Scheme' should be introduced to mitigate any nuisance created.
- That if the proposed restrictions are implemented, a 'Resident Permit Scheme' should be introduced to assist St Anne's ratepayers with the parking.
- That the proposals will have a dramatic effect on residents who own Motor caravans themselves, which will be unable to park after 6pm in the evening. Therefore believes that residents should be provided with appropriate 'resident parking permits' which would allow continued parking of their own Motor caravans outside their own homes.

Officer's Response

There has been no evidence to indicate that vehicles will be displaced into the town centre roads of Lytham and St Anne's, therefore Fylde Council has not considered expanding the scheme to include these roads. However Fylde Borough Council will be monitoring the impact on these areas to assess whether further restrictions are subsequently required due to ongoing concerns, not for individual one-off issues.

Requests for Resident Parking in the area which have already been received by the residents parking team (residentsparking@lancashire.gov.uk), have been considered and assessed against the current criteria.

If residents wish to request further locations be assessed, then they can do so by emailing residentsparking@lancashire.gov.uk where they will be considered accordingly. The Lancashire County Council Residents Parking Service has been introduced to provide a consistent and considered approach to requests for new schemes. There will be a limited budget for such work and therefore the county council needs to ensure that each request is effectively measured against the criteria approved in January 2021.



Stage one of the process requires that officers establish that the following minimum essential criteria is met:

1. Within the area to be included in the scheme, not more than 50% should have off street parking or the potential to form off street parking within the curtilage of the property.
2. The number of addresses in the proposal needs to exceed 20.
3. There needs to be sufficient available parking space to implement a workable scheme.
4. There must be significant evidenced support provided for the implementation of the scheme.

Should the proposed scheme fail to meet the minimum essential criteria then the scheme will not be taken forward at the present time.

Responses to changes to the Time Limited Waiting on Inner Promenade and South Promenade along with No Waiting and No Loading Restrictions

Appendix 'D' Drawing Nos. D23-24(1)-FBC-A, D23-24(1)-FBC-B, D23-24(1)-FBC-C and D23-24(1)-FBC-D

The purpose of these proposals is to change from 18-hour to 4-hour Limited Waiting on Inner Promenade along with an extension to the current 2 Hour Limited Waiting on South Promenade to ensure a turnover of available on-street parking options.

Objections

Correspondence received in relation to the proposed changes to the day time parking raised objections on the grounds that the changes in the time limited parking along the promenade will have a negative impact on residents and business and not improve anything in the area.

The correspondents also believed that the proposals will result in the promenade being permanently jammed with traffic as vehicles will be constantly parking and leaving their slots as their limited time runs out.

The main points raised by the objectors are as follows:

- That the proposed reduction of 18-hour free on-street parking to 4-hours along Inner Promenade around Fairhaven Lake will have a negative impact on local businesses, particularly the recent renovated café, the public baths, cinema and miniature golf/pitch and putt as visitors do not come to the seaside for only 4-hours and often spend the day in the area.
- That the 2-hour and 4-hour time limited parking proposed along the promenade will provide insufficient time for families to spend the day enjoying the facilities like mini golf, the splash park, beaches and arcades or walk into the town to have a look around and have some lunch.
- That the proposals will result in a reduction to the amount of tourists coming in to the town or clog up the inner streets.



- That South Promenade is a relatively narrow road and the statement of reasons for the extension of the 2-hour parking is to improve the turnover of parking spaces with cars constantly coming and going after their 2-hour limit this will add to the congestion already present.
- That the proposals will reduce the footfall and expenditure tremendously and result in people either going to Fleetwood or Cleveleys or using the side roads producing greater congestion.
- Lytham St Annes is a tourist town which should be encouraging overnight guests; however the proposals will have a devastating effect on the hotel business with a potential loss of fifteen jobs.
- That the hotels in the area have limited parking and rely on free on-street parking for guests' vehicles. The proposed section of 2-hour limited waiting on South Promenade north of East Bank Road will cause hotel guests to have no available convenient on-street day time parking. They cannot be expected to move their cars every 2-hours when they are staying in a hotel.
- That the extension to the 2-hour parking on South Promenade will have a detrimental effect on hotel employees that heavily rely on the free on-street parking. The proposals will result in employees having to park on the Pay and Display car park opposite the YMCA swimming Pool at a rate of £6 per day/£150 per month and factor this in to their budget. This places a direct financial consequence on their jobs, salaries and quality of life for their families.
- That the time limited parking will affect visitors as well as local residents that have limited parking available on their forecourt who periodically need to park on the promenade. The proposals will result in residents not being able to park for any length of time during the day.
- That residents of the area that have limited parking available rely on the free 18-hour parking along the promenade for when family and friends visits and stay for over 4-hours.
- That the side roads off the promenade are invariably full, which will be exacerbated by limiting the options on the promenade.
- That the proposal will push parking issues slightly further afield onto the residential streets and at worst put people off visiting St Anne's.
- That further restrictions should not be implemented as charging and restricting of parking has had a negative effect on Southport with people not traveling due to the restrictions and costs and believes that if this happened to St Anne's it would be hugely detrimental.



In addition to objections against the proposals a number of suggestions were raised as follows:

- To provide sufficient time for a family to visit and spend the day enjoying the facilities and accommodate residents wishing to park along the promenade suggests a maximum of 8-hours should be considered along the whole promenade.
- To alleviate further congestion at Granny's Bay suggests that the proposed time limited parking at Fairhaven Lake be extended to include the section of Inner Promenade at Granny's Bay and Ansdell Road South.
- To alleviate the problems of Motor caravans parking all day at the end of Inner Promenade in the area that is unrestricted, suggests that the time limited parking be extended to the whole length of the Inner Promenade to Ansdell Road South.
- To avoid detrimental effects on nearby businesses on Inner Promenade, particularly the recent renovated café, suggests that unlimited parking from Fairhaven to as far as the Beach café, and then 4-6 hours' time limited parking beyond for the rest of Inner Promenade.
- Suggests that all day parking should be available along the promenade with charges introduced.
- Suggests that although there are lots of car parks that people should be encouraged to use, more prominent signage and prices should be provided to encourage people to park all day in St Anne's.
- Suggests that the multi-storey car park in St Anne's Square could be a couple of pounds a day resulting in it being full, rather than half empty.
- Suggests that paid for parking all down the promenade for a nominal fee of £5 for the day for cars and motorcycles should be introduced, with no parking for Motor caravans.
- Suggests more disabled parking should be provided in St Anne's Square as currently believes these are minimal.
- Suggests that 2-hour free parking be considered around the Fairhaven Road and along St Anne's area as these are residential areas and the Motor caravans take the space of two cars. Believes that this would allow car users to park for a short while to enjoy the surrounding immediate area.
- Suggests that the 2-hour time limit proposed outside the public baths, cinema and miniature golf/pitch and putt be amended to 4-hour the same as that proposed in front of Fairhaven Lake.



The correspondents make the following additional comments:

- That the No Waiting 9am-10pm might as well be a No Waiting at Any Time restriction, as they believe it will push more parking on the neighbouring streets.
- That although not covered by the proposal, believes that vehicles parking on pavements, especially, but not just Motor caravans, needs addressing as it is damaging the pavements and restricts access for pedestrians in wheelchairs.

Officers Comments

The time restrictions proposed are for relatively short sections of the promenade with longer stay options available further along the promenade.

The proposals are being introduced to ensure a turnover of available on-street parking options, enabling shorter stays closer to the main areas of attraction to encourage a greater turn-over of visitors in these areas. There are unrestricted areas further along the promenade and a number of public car parks that offer areas for visitors wishing to stay for longer periods of time.

The proposals should increase footfall, by increasing the turn-over of parking spaces, enabling more visitors to visit the area.

There is unlimited parking along Inner Promenade from Fairhaven Road Car Park to St Paul's Avenue. The time limit along Fairhaven Lake is to encourage a turn-over of visitors through the day to enable more customers to visit the tourist area and businesses.

The 4-hour time limited area has been restricted to beside Fairhaven Lake as this is this area's main tourist destination. Other areas are proposed to be unrestricted to enable those who wish to stay longer to have alternative parking further away from the main tourist area.

The proposals include a 2-hour limit along South Promenade from Fairhaven Road to East Bank Road with a current 2-hour limit already in place from East Bank Road to Beach Road. Increasing the 2-hour limit along this stretch of road, which is beside the area's primary tourist attractions, will encourage a greater turnover of visitors who wish to stay for shorter periods. Long stay parking is available on the car parks and further along the promenade.

The concerns raised relating to further congestion due to increasing the 2-hour time limited parking along South Promenade have been noted, however this section is wider than the area where there is currently 2-hour limited parking in place. Therefore the impact to the new section will be no higher than what is currently experienced further along the promenade.

The overnight parking of visitors to hotels should not be impacted by the introduction of the time restrictions as they would be permitted to park after 4pm and remain in the same parking area until 10am the following day. With Lytham St Annes being a prime tourist area, the rest of the time these spaces would be available for use by



day visitors to the central attractions. Longer stay parking is available further along the promenade and in the public car parks within the area that can be utilised by hotel visitors and staff.

The section of road affected by the change from 18-hour to 4-hour parking is limited to only along Fairhaven Lake and only on the lake-side of the road. Most properties along this stretch have significant off-street parking with most of the side of the road where the houses are located not having a time limit. Therefore unrestricted parking for residents and visitors will still be available outside residential properties.

In addition, for those who wish to stay longer off street car parks are also available in the area along with unrestricted parking further along the promenade.

It is acknowledged that Motor caravans park for extended periods and take the space of two cars, however with the introduction of an overnight ban the length of stay by these types of vehicles will be reduced allowing for day visitors to the area to find appropriate short-term parking. Although the length of stay and number of these types of vehicles may decrease with the introduction of an overnight ban visitors who happen to use Motor caravans to visit the area during the day are not proposed to be discouraged.

Comments received relating to the No Waiting 9am-10pm restriction along South Promenade between St Anne's Road West and Fairhaven Road area are duly noted. However the proposal in relation to this restriction is to redefine the descriptions of the lengths of restriction that has been in place for a number of years with no change to the restriction times or limits. Therefore, this proposal will not impact on the neighbouring streets.

In relation to introducing on-street parking charges, a proposal to introduce on-street parking in the area was consulted on by Lancashire County Council in 2020 which was strongly objected to by residents of the area. These proposals introduce additional 2-hour and 4-hour parking without charges along the promenade to ensure a turnover of available on-street parking options, enabling shorter stays closer to the main areas of attraction to encourage a greater turn-over of visitors in these areas.

Comments regarding pavement parking being a problem is acknowledged, however whilst the Department for Transport consulted on a national ban in 2020 local authorities are still awaiting the result.

The offence of unnecessary obstruction of the highway, which includes the road as well as the pavement, already exists and has not been decriminalised. There are existing statutes and regulation which allow proceedings to be brought by the police under criminal law for situations where parking on the pavement, in such a way as to cause obstruction, is deemed to be avoidable.

Local authorities are currently unable to enforce against obstruction using their civil parking enforcement powers and therefore pavement parking is only enforceable by the police.

With regards to additional suggestions, Fylde Borough Council has also confirmed the following:



- That the disabled bays on St Anne's Square Car Park currently exceed recommendations and therefore there is no intention to increase these.
- The comments regarding the tariffs for the St Anne's Square multi-storey car park are noted, however this car park is operated by a private company which sets its own charges with the current useable area on the lower floors of the car park often at capacity.
- That they will review the entrance signs to the car parks. The majority of car parks are signed from the major roads, if this is not the case Fylde Borough Council can request the sign to be examined by Lancashire County Council.

Responses to the Restriction of Motor caravans 6pm to 8am

Appendices 'E' and 'F'

Drawing Nos. D23-24(1)-FBC-1, D23-24(1)-FBC-2, D23-24(1)-FBC-3, D23-24(1)-FBC-4, D23-24(1)-FBC-5, D23-24(1)-FBC-6 and D23-24(1)-FBC-7

The purpose of this proposal is to introduce measures to prevent anti-social overnight parking by Motor caravans by introducing a No Motor caravan restriction from 6pm – 8am whilst still providing car parking for residents and visitors to the area.

Objections

Objections were received on the grounds that the prohibition of Motor caravans is unfair as any vehicle that is parked up along the promenade is a visitor to the area, therefore spending money in Lytham St Annes and are a valuable part of all year-round tourism income.

The objectors state that since covid, the number of Motor caravan owners has increased dramatically and they believe the council should look at how to cater for this segment of tourism and not discriminate against one user group.

The objectors state that St Anne's on Sea Town Council and Fylde Borough Council have enabled the area to flourish with many events that take place throughout the area. The objectors believe that the proposals will have a negative impact on the towns resulting in less people visiting the area and in turn, less money being spent in local shops, cafés, pubs and restaurants.

The main points raised by the objectors are:

- The introduction of the proposal will see a fall in the number of visitors resulting in a decrease in revenue to the area.
- That St Anne's is a tourist town which needs tourist money and believes that if people cannot access and park in St Anne's, they will go somewhere else which over time could have a far-reaching consequence to businesses in the town when the British high street needs all the help it can get.



- That they believe to have a restriction that simply says visit St Anne's as long as you leave at 6pm, just before the restaurants, pubs or takeaways open is an anti-tourist measure.
- That by restricting Motor caravans from 6pm-midnight, which they believe is the busiest time of day, will seriously affect the ability of traders in the town to survive.
- That if the issues are anti-social behaviour, they assume it is in relation to staying overnight by the roadside and not the activities before 10pm. Therefore requests consideration for the issue to be more specifically targeted, by moving the start time to allow Motor caravans to enjoy the evening in St Anne's.
- That the proposal is an unnecessary solution to a very small problem as the Motor caravans that park up are for the most part Bonafide visitors there to avail themselves of all that St Anne's has to offer. States that some may abuse the current regulations, however, believes that these should be tackled on a case-by-case basis and not a blanket catch all solution.
- That there is not enough parking available for Motor caravans to stay overnight in the car parks with only one sluice point for the disposal of toilet waste and are also priced higher than Aires on the continent, and even neighbouring Fleetwood.
- Believes that spoiling the view of residents is not a tangible reason and that moving them from the promenade, which is a wider than average road in places, onto the side roads is a danger to the local residents and communities.
- That at face value the proposal appears short sighted as no provision appears to have been considered by local authorities for providing a suitable and appropriately sized area with basic facilities for Motor caravans to enjoy and - contribute to the local economy of St Anne's and Lytham. Suggests making certain areas of South Promenade available for Motor caravan parking.
- That most Motor caravan owners would use the car parks if they were not so expensive. States that most people staying on a small caravan site pay less than the Fylde Borough Council car parks cost per night.
- States that the dedicated spaces within the car parks have a maximum length of six metres, however the vast majority of Motor caravans are longer than this and probably fall into the seven to seven and a half metre bracket. Therefore, technically only small Motor caravans, which are less likely to cause a nuisance on the highway, can use the facilities. Suggests a number of larger spaces similar to those near the Lifeboat station be created in all the car parks where overnight parking is permitted.
- That the majority of the car parks that provide oversized parking bays for Motor caravans are insufficiently lit. States that in a lot of areas, lights are already there, however not turned on at night. States that they are a member



of two motorhome clubs and most of the people they know will not park up their expensive vehicles overnight in areas that are unlit, for fear of damage or nuisance. Believes that if the council and residents wish to encourage Motor caravans away from the main roads, where they are parked under street lamps, they need to discuss the provision of lots more suitable spaces on all car parks, with basic lighting (not floodlights, just a couple of minimal lamps either side of the bays so Motor caravaners feel safe).

- That Salters Wharf car park is well lit and close to lots of amenities, but the seven bays are soon taken, however the rest of the car park has been almost empty. Believes that there is no reason more spaces could not be provided at very little cost to the council.
- That Motor caravan owners like to park near to facilities like shops and restaurants and some of the car parks in Lytham St Annes are some distance away from such facilities and the campsites are often miles away, often with no public transport available.
- That Motor caravans are the future of the holiday industry and if they are not allowed to park on the promenade, they will either park on the residential streets which will annoy the residents or turn around and leave the town taking their money with them.
- The promenade is a much wider road than most other roads in the area and there are only residential houses on one side for most of the length from Ansdell Road South up to Todmorden Road. On Inner Promenade between Cartmell Road and the lake at Granny's Bay and South Promenade from Cartmell Road to the Grand Hotel the roads are extremely wide and can cope with parking of any vehicles on there at any time. Therefore the sea side of the promenade is by far the best location for the parking of these vehicles as they are not too close to the residential houses.
- That the Motor caravan community pay thousands of pounds to own and maintain their vehicles and wherever they go they need fuel, servicing, food and supplies. States that they have the means to pay for what they need if the charges are reasonable and the facilities offered match their needs.
- That the majority of Motor caravan owners contribute significantly to local businesses, eating, drinking and using the shops and cafes along with other attractions in the area and believes that they are not a nuisance and do not cause any disruption to the community.
- That as a resident they walk along the areas stated in the proposal every week and have never seen any anti-social behaviour from Motor caravan owners and that they have spoken to a police officer who was also unaware of any arrests for anti-social behaviour.



Along with the objections additional suggestions were also raised:

- That due to the popularity of Motor caravans visiting the area, more facilities should be provided for them and thus capitalising on their existence.
- That Stanner Bank Car Park is greatly underused and would be the ideal location for an overnight motorhome parking location for a small charge.
- That if the proposals are to be implemented, consideration should be given to extending the hours of the restriction from 6pm to around 11pm. This would allow Motor caravan owners to park up to see sunsets, take evening walks, dog walks and visit a restaurant before driving off for the night.
- That if the dedicated bays are found to be empty, consideration should be given for a lower rate during the winter months.
- That if the plan for the proposal is to force Motor caravans into a more appropriate place of a designated car park, then consideration should be given to restricting the whole area between the promenade and Clifton Drive.
- One objector also states that they believe the proposal is short-sighted as this would be an opportunity for the council to increase their revenue by charging for overnight parking.

The correspondents also make the following additional comments:

- That in Europe, especially France, as owners normally do not bring a car, towns and villages provide, for a low fee or for free, dedicated areas usually within walking distance of the amenities. The intention is to entice the visitors into town to spend in local businesses, some of these "aire de camping cars" also include a local business map to assist which is very handy.
- That there is a business group starting to run more of these areas and adding security barriers/power/service areas (toilet, water dump) they are called www.campingcarpark.com.
- That there is a good Facebook group called Campra (campaign for real aires) that has a host of helpful information for councils.

Correspondence of Support

Numerous expressions of support were received, raising comment around the issues of nuisance, eyesore of the vehicles spoiling the view, excess exhaust fumes, noise pollution and litter amongst others. However a number raised concern that the proposals will displace traffic onto nearby side roads causing more inconvenience for residents. It is requested that consideration is given to extending the restrictions to all the side roads leading to the promenade and the provision of extra designated Motor caravan parking within the car parks.

The correspondents state that this form of "wild camping" in Motor caravans is not allowed in many locations, including National Parks and although they support the proposals, believe that a cherry-picked ban will not solve what is a growing problem. The correspondents request further consideration is given with regards to the social



issues associated with the Motor caravan parking, including noise, littering and toileting and include a borough wide restriction on overnight wild camping, in non-designated residential locations and not allow the streets of Lytham St Annes to become campsites.

States that tourism is a large part of Lytham St Annes economy and should be addressed appropriately giving consideration as to where overnight visitors will park and providing provisions for them. Believes that spoiling the view of residents is not a tangible reason and that moving them from the promenade, which is a wider than average road in places, onto the side roads is a danger to the local residents and communities.

In addition some correspondents raised concern that the proposals will displace Motor caravan parking to specific areas as detailed below:

St Paul's Avenue The correspondent states that St Paul's Avenue has considerable traffic from drivers using satellite navigation systems and are being instructed to use it as the route between Clifton Drive and the Inner Promenade. There is also traffic from students being dropped off and picked up along with many activities and sporting events taking place each day and evening at the AKS School.

The correspondent believes that if the proposals are implemented, traffic is likely to park along the footpath on St Paul's Avenue causing problems for residents, the AKS School, Bin Wagons and Tradesmen alike, particularly as the existing St Paul's Avenue car park by Fairhaven Lake only has eight dedicated spaces. Therefore, requests consideration be given to including St Paul's Avenue in the proposal the same as King Edward Avenue and increasing the number of Motor caravans in the car park.

Marine Drive The correspondent states that Marine Drive is open to the promenade and they believe that if vehicles suddenly decided to park there, it would cause home owners additional problems with vehicles blocking the view of residents trying to leave their driveways. Therefore, requests that consideration be given to including Marine Drive in the proposals.

Woodville Terrace and Lowther Terrace The correspondent state that Woodville Terrace and Lowther Terrace are heavily residential streets surrounding Lowther Gardens that are used daily and, in the evenings, by large numbers of people intending to visit the Gardens and Pavilion and two Nursing Homes.

The correspondent states that these roads are frequently full of parked cars and some Motor caravans and believe that if the proposals are implemented these roads will become the first available parking for Motor caravans which will increase the number and drastically reduce the opportunity for other visitors to park. This will adversely impact on the current attractions in Lowther Gardens and at the Lowther Pavilion, both of which are major attractions in Lytham.

The correspondent requests that consideration be given to include both Woodville Terrace and Lowther Terrace in the proposals. They believe that if additional Motor caravans park on the roads it would make the current situation much worse as they



are a lot wider than cars and would restrict visibility, particularly if they are parked on both sides of the road making it dangerous for both pedestrians and drivers.

Once correspondent also suggested that Swainson Street should also be included in the proposals.

Church Road The correspondent states that Church Road in the vicinity of Lowther Gardens towards St Cuthberts Church, is another location popular with owners of Motor caravans. The correspondent believes that the parking of Motor caravans in this area presents a traffic hazard. When heavy visitor car parking has reached down Church Road towards St Cuthberts Church, these wide vehicles make it difficult for traffic to pass down the busy road when parking is on both sides and one way traffic becomes unavoidable. Therefore, requests that consideration be given to including Church Road in the proposals.

Upper Westby Street The correspondent states that over the last four years, they have noticed a growing number of Motor caravans parking on Upper Westby Street, especially between Horsfall Avenue and The Serpentine. It is stated that this location is not an obvious Mecca for these types of vehicles, but it is relatively quiet for traffic and has a quick pedestrian cut through into Lytham and Lowther Gardens via a walk through on the side of the Cricket Club. Therefore, it has much to offer Motor caravan owners and requests that consideration be given to including Upper Westby Street in the proposals.

West Beach, Central Beach and East Beach The correspondent states that during the 2023 Lytham Festival, Motor caravans were parked on West Beach, Central Beach and East Beach, however they are not included in the proposal. The correspondent believes that if the proposal goes ahead these streets will get more Motor caravan parking in front of their homes and therefore requests that consideration be given to including West Beach, Central Beach and East Beach in the proposals.

Bentinck Road, Sandgate and Beach Road The correspondent states that the proposals will only move the problem elsewhere, in particular, onto the link roads between the promenade and Clifton Drive. The correspondent believes that the links roads should be included in the restrictions and request that consideration be given to including Bentinck Road, Sandgate and Beach Road in the proposals.

Derbe Road The correspondent states that Derbe Road is already a busy thoroughfare for both cars and large delivery vehicles. With Motor caravans parking close to driveway entrances and the entrance to the underground car park of Vernon Lodge, this causes great difficulties when trying to exit the property. It also creates a very unsafe driving situation as the Motor caravans obscure any vision of oncoming traffic. Requests consideration be given to introducing a 24-hour ban of parking on Derbe Road to ensure safe access to all properties both day and night, whilst still allowing residents and visitors to park their own vehicles.

Eden Avenue The correspondent states that Eden Avenue, which is the next road along Clifton Drive, adjacent to Fairlawn, also experiences Motor caravan parking issues, especially at weekends and during the Lytham Festival and many other "On Green" events. The correspondent believes that the proposals will just move the



problem on to other adjacent residential locations making the situation worse for residents.

Side roads off Clifton Road The correspondent states that the proposals may have an unintended consequence of Motor caravans being parked on the side roads off Clifton Road and requests consideration for these roads to be included in the proposals.

In addition to the extension of the proposals the following suggestions were received:

- That all the roads within the FY8 postcode should be included in the proposals and that consideration should be given to amending the start time of the prohibition of Motor caravans from 6pm to around 8pm-10pm.
- One correspondent stated that the proposals should include banning overnight parking for Motor caravans on any public street with another stating that they believe that by prohibiting Motor caravans, the problem will be moved onto the side streets and onto Clifton Drive North. Therefore they believe that the proposals should be accompanied by the whole planned area being controlled by parking meters or double yellow lines.
- The correspondent suggests a prohibition of Motor caravans for the whole of Lytham and that the council gives serious consideration to creating Motor caravan Aires, similar to those in France. This will provide appropriate parking and facilities for the vehicles and income for the council.

Officers Comments

Although the promenade is a much wider road than most other roads in the area with residential houses on one side, the volume of Motor caravan's parking along the promenade, particularly opposite residential properties and hotels during the summer season, has reached a significant level where they are parked in the same areas over extended period and although individual Motor caravans may move on, others replace them.

Councillors in wards, where the promenade runs through, have reported for many years complaints from residents about the cumulative visual impact of Motor caravans, the impact on parking provision for residents and other visitors and the antisocial behaviour of a minority of Motor caravan users including sitting out on footpaths, disposal of liquid waste down drains and emptying of liquid waste in park areas along the promenade. In addition to ward councillors, other residents have also reported such issues to Fylde Borough Council, however most instances of antisocial behaviour of this nature have not been directly reported to the Police.

There are a variety of different sectors of the tourist industry, Motor caravans being one of them. The proposals attempt to balance the needs of several sectors of tourism.

It is acknowledged that the introduction of the Restriction of Waiting of Motor caravans from 6pm - 8am may discourage some Motor caravans from visiting Lytham St Annes, however areas that are currently significantly occupied by one type of tourist, who stays for several days, will become available for other types of



tourists creating a higher turnover of spaces and enabling greater number of visitors to the area to enjoy the local attractions including the surrounding area of Biological Heritage Site and Site of Special Scientific Interest.

It is acknowledged that Motor caravans park for extended periods and take the space of two cars, however with the introduction of an overnight ban the length of stay by these types of vehicles will be reduced allowing for day visitors to the area to find appropriate short-term parking.

Although the length of stay and number of these types of vehicles may decrease with the introduction of an overnight ban, visitors who happen to use Motor caravans to visit the area during the day are not proposed to be discouraged.

The areas included in the restriction of Motor caravans have had a history of issues. These issues are magnified given the proximity of the both the Lytham Foreshore Dunes and Saltmarsh, which is a Biological Heritage Site and the Ribble Estuary, a Site of Special Scientific Interest and whereby the preservation and improvement of the amenities of the area, noting their environmental and biodiversity position, becomes not only relevant but that much more important.

Although there may be some displacement of Motor caravan parking, it has been observed that most Motor caravan owners prefer to park beside open spaces away from residential properties. As such, a subsequent addition to the scheme to include roads that have open spaces beside them, has been included and consulted on.

It would be impractical to include all streets along the promenade or apply a Borough-wide ban as suggested where no noticeable issue or justification has been identified. There has also been no evidence to indicate that vehicles will be displaced into the town centre roads of Lytham and St Anne's due to either the restriction of Motor caravan overnight parking or the changes in the day time parking restrictions along the promenade.

Fylde Borough Council will be monitoring the impact on side streets from the promenade and the town centres of Lytham and St Anne's to assess whether further restrictions are subsequently required due to ongoing concerns, not for individual one-off issues.

In addition Fylde Borough Council has provided designated Motor caravan overnight parking on the five long stay car parks; including those that are closest to the centre of St Anne's with lighting that comes on at night. Currently there are no plans for additional lighting to be added. If the lighting on individual car parks is not working, this can be reported to Fylde Borough Council which will arrange for repairs to be undertaken.

Comments regarding the insufficient amount of designated spaces and facilities within the car parks has been noted, however Fylde Borough Council has designated Motor caravan parking areas on several sea front car parks with a sluice unit provided on one car park.

The maximum lengths of the dedicated Motor caravan spaces have been set due to the physical limits within each car park. The five car parks that allow Motor caravans



to stay overnight have maximum lengths of five, six, seven, eight and ten metres catering for a variety of lengths of vehicles.

The number of spaces provided on off-street car parks for overnight stays by Motor caravans has increased over time. In conjunction with this proposal, Fylde Borough Council has increased the number of town centre car parks in the scheme with the inclusion of eight spaces at Fairhaven Road car park with other options being considered. The car parks are located in desirable areas, being located beside the beach with the tariffs set to encourage a turn-over of users and a higher tariff for those locations closer to the town centre. A lower tariff is already in place during the winter months (November to March) when the number of tourists has reduced.

When Motor caravans were first allowed to park on St Annes Swimming Pool car park (by Salters Wharf), they could do so in any area of the car park. However this resulted in most of this site being taken over by Motor caravans which negatively impacted on surrounding businesses which complained that customers were unable to park in this area, particularly during the key summer season where day visitors were unable to find suitable parking spaces. As such Motor caravans have been limited to the seven designated bays. It is also not possible to lengthen the bays in the other car parks without impacting on their ability to operate as car parks, which is their primary purpose.

Stanner Bank Car Park has previously been considered by Fylde Borough Council, however there are no intentions at this current time to allow Motor caravans to park overnight. In addition, there are currently no other parking areas that are suitable for Motor caravans that are closer to the town centre, however this will be kept under review.

Additional comments regarding the Motor caravan community and the use of aires have been noted and should a private operator wish to set up a suitable site on private land then Fylde Borough Council would be open to discuss this further with them and help them through the relevant legislative requirements.

Implications:

This item has the following implications, as indicated:

Legal

There are legal implications for the county council to consider in relation to the proposed order.

Section 1 Road Traffic Regulation Act 1984 allows the traffic authority to make an order where it appears to them that it is expedient to make it and then lists seven reasons to justify the same.

The reasons for this proposed Order are:

(a) for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or



(c) for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or

(f) for preserving or improving the amenities of the area through which the road runs

The justification for reasons (a) and (c) are evident from the content of the report. It must be noted that reason (f), particularly in relation to Motor caravans, is somewhat subjective. Preserving and improving the amenities of an area is open to interpretation and one person's perception of preservation and improvement may well be different to another. In this case, Cabinet may consider that it is not only the nuisance behaviour in itself but also the proximity of the Site of Special Scientific Interest and the Biological Heritage Site with their associated environmental and biodiversity issues that are important considerations in their deliberations as to whether reason (f) is satisfied, and the proposed order is made.

Sites of Special Scientific Interest are regulated by Natural England and protected under the Wildlife and Countryside Act 1981 whereby a local authority has the duty (set out in Section 28G Wildlife and Countryside Act 1981) to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest.

Biological Heritage Sites are those non-statutory wildlife sites that have been identified by the County. They are sites that make the most significant contribution to the biological diversity of Lancashire. Any losses of these sites would be regarded as significant beyond the immediate locality and would be difficult or impossible to make good for all practical purposes. The survival and conservation of Biological Heritage Sites is a key indicator of sustainable development.

Given the issues involved, the implementation of the order would be lawful but may be open to scrutiny.

Financial

The costs of the Traffic Regulation Order and associated signs are estimated not to exceed £50,000. The scheme is being funded by Fylde Borough Council, as such there is no financial implication for the county council.

Risk management

There are no significant risks associated with the proposals set out in this report.



List of Background Papers

Paper	Date	Contact/Tel
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None

Reason for inclusion in Part II, if appropriate

N/A

