



***Australian Caravan Club Limited***

***ACN 121 300 856***

***P O Box 340 Rosewood QLD4340***

***Ph/Fax: 1800 734 493***

***[www.australiancaravanclub.com.au](http://www.australiancaravanclub.com.au)***

***Email: [policy@australiancaravanclub.com.au](mailto:policy@australiancaravanclub.com.au)***

Submission to NSW Manufactured Homes and Caravan Parks Manufactured  
Home Estate and Camping Grounds  
Discussion Consultation Paper

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# Submission to NSW Manufactured Homes and Caravan Parks Manufactured Home Estate and Camping Grounds Discussion Consultation Paper

## Executive Summary

### Background

The Australian Caravan Club Limited (ACC) is a National not-for-profit organisation representing the interests of all types of Recreational Vehicle (RV) Owners in Australia. The majority of our membership is in the over 55 category ("Grey Nomads"). Many areas of the discussion paper are outside our area of business expertise therefore our focus is on the needs of the "Grey Nomad" RV traveller.

### Section 4 Supporting land uses in the Right Locations

The ACC believes it should be up to councils to make their decisions based upon local strategic planning and the commercial viability of each operation.

We also believe the threshold difference could be increase to 90% or more

### Section 5 - Simplify Approvals

Question 6 - How long a caravan/campervan should be permitted to be used outside caravan parks without formal approval? The ACC believes the proposed extensions does not go far enough and we recommend that it be extended to include up to 7 units for up to 7 days. Where strict controls are exercised detailed in our ACCESS programme Refer Exhibit A

Question 7, which asks, how should the new framework facilitate the use of self-contained Caravans and campervans? Camp grounds and caravan parks should be considered to be

1. Full service /Tourist parks , or
2. Self-sufficient Parks and camp grounds.

Each type should have different regulatory requirements. Each type could coexist in the same park.

### Section 6 - Promote Diversity of Housing

From a consumer perspective we do not support or agree with merging the use of Residential Parks and Tourist Parks.

### Section 7 - Industry Innovation

With more Recreational Vehicles (Caravans and Motorhomes) becoming much more self-sufficient regulations must give consideration to the needs of the traveller in self-sufficient Recreational Vehicles, i.e. no longer does one size fit all requirements.

# Submission to NSW Manufactured Homes and Caravan Parks Manufactured Home Estate and Camping Grounds Discussion Consultation Paper

## Background

The Australian Caravan Club Limited (ACC) is a National not-for-profit organisation representing the interests of all types of Recreational Vehicle (RV) Owners in Australia.

A recent poll within the club indicates that 78% of the membership of the ACC are over 55 years old and therefore fall into the category of “Grey Nomads”. These RV travellers generally travel outside the peak holiday periods however, many travel to coastal destinations during peak summer holiday period to be part of extended family groups.

The ACC commends the NSW Government for entering into this consultation process. In particular the efforts to reduce red tape and respond to the changing nature of the industries associated with caravanning and camping. We also appreciate this opportunity to put forward the views of our membership.

As there are many areas of the discussion paper that are outside our area of business expertise, our submission therefore focusses on the contribution made by and the needs of the “Grey Nomad” RV traveller. We shall also limit our discussion to only issues faced by our members (consumers) using caravan parks and camp grounds.

## Section 4.0 - Supporting land uses in the Right Locations

A significant issue impacting the tourist Caravanners and campers is the loss of many tourist sites to residential purposes. We believe it is a step in the right direction to define parks as either Residential Park or Tourist Park. Regarding the threshold differences we believe that in a Residential Park the threshold difference could even go as high as 90% or more. Our rationale for recommending this higher threshold is that many tourists (including many of our members) would see a residential park as a less than desirable place to spend time, however, this would depend upon the locality. We see the main benefit of providing tourist sites in a residential park to accommodate visitors to permanent residents within the park.

We see option 2 as the desirable approach, i.e. allow councils to make their decisions based upon local strategic planning and the commercial viability of each operation.

## Section 5 - Simplify Approvals

The first matter we seek to consider in this section is question 6 which asks, how long should caravans, campervan or tents be permitted to be used outside of parks and camping grounds without the need for council approval ? (Motorhomes should also be included). The ACC believes the current restrictions are very limiting restricting property availability for camping to up to two campervan, caravan or tents for not more than two days and occupied for not more than 60 days in any twelve month period. The suggested amendment to include long weekends does not go far enough and we recommend the two unit restriction be increased to up to 7 with a seven day limit. Within the Australian Caravan Club we have many rural based members who provide their property for travelling club members to park their caravan overnight free of charge. Members utilising this option (the ACC Farm Stay) must comply with strict Club guidelines concerning retention of all waste or as required by the property owner. The guidelines are set out in the Club's program known as Australian Caravan Club Environmentally Safe Scheme (ACCESS) Exhibit A. Members must be registered under the ACCESS program to utilise the Farm Stay option. Under the existing and proposed changes it will be difficult for these club members to make their rural property available for no cost camping of other members. An exception needs to be introduced to exclude Rural Land where inconvenience to neighbours would not be an issue from the regulation where it is shown the camper and caravan meet strict guidelines of schemes such as ACCESS. A recent survey of our membership revealed 48% are looking for alternatives to the traditional caravan park when travelling in the countryside. If allowed to proceed this proposal will be a defining moment for many Caravanners. The proposal does not cater for those who are looking to experience a rural stay. Stuck in a caravan park does not provide this experience.

We also seek to address question 7, which asks, how should the new framework facilitate the use of self-contained Caravans and campervans?

Over the past 10 years there has been major developments and changes with the inclusions and facilities provided in modern Caravans and other Recreational Vehicles (RVs) to such an extent that the modern RV traveller is self-sufficient and in the majority of situations needs nothing more than access to potable water and a dump point and as a bonus possibly power. On the one hand we have manufacturers building Caravans and other Recreational Vehicles that are self-sufficient and on the

other we have regulations and requirements that are out of step with these limited needs. With these changes more and more travellers do not want or need the services and facilities of modern Tourist Parks/Camp grounds and are not willing to pay for facilities and services they do not use and *Do Not* need. For these reasons we see there is a need to recognise and accommodate:

1. Full Service Tourist / Holiday Parks and
2. Self-Sufficient Holiday Parks/ camp grounds [these would be more camp grounds than holiday parks].

Commercial operators of this latter group would only need to supply water and a Dump Point with an option for power on a fee-for-use basis. We believe that the regulations need to recognise these changes and allow the development of self-sufficient parks/camp grounds or allow existing Tourist/Holiday Park facilities to include this type of site. This has the potential to significantly reduce overheads and costs as well as meet the needs of the self-sufficient traveller. We also acknowledge that Full Service Tourist/Holiday Parks are an important and integral part of RV tourism. Our recent survey results reveal 52% of our members use caravan parks as their primary holiday facility.

Sub-section 5.4 discussing streamlining of approvals to operate existing caravan parks and camp grounds also discusses Primitive Camping Grounds. The ACC sees the inclusion of the primitive camping ground concept to be one of the most beneficial concepts which are not replicated by other states. For 48% of our membership these primitive camping grounds provide the ideal camping experience. From our perspective we believe this concept must be retained in its present form, however they should not be limited to “remote” localities. The key to their success from our perspective is the limited facilities and open space. Many sports grounds and showgrounds could provide primitive camping at minimal development cost which could be of great economic benefit for many smaller towns in attracting more tourists and travellers to their localities. We believe these types of facilities should be encouraged with simplified approval without ongoing review.

We have no issues with including a definition of primitive campsites however we believe such definition needs to be wide ranging and not be prescriptive. Primitive campsites should only be required to have minimal facilities such as a self-composting toilet; however, this should not be an inhibitor to the developer of such a site including additional amenities.

## Section 6 - Promote Diversity of Housing

From a consumer perspective we do not support or agree with merging the use of Residential Parks and Tourist Parks. A majority of tourists prefer to stay in a tourist park without residential units. Within a Residential Park there should be a few sites (say 6) available essentially for visitors akin to a visitor carpark in unit blocks. We do not support allowing tourist parks to also include residential sites which may cause conflict between the permanent residents and the tourists. We also appreciate that in certain localities there might be good commercial and social reasons for allowing deviations in which case we believe the local council would be best placed to make the decision within a firm set of guidelines.

## Section 7 - Industry Innovation

Within this section we believe the focus appears to be more on modular building innovations for more permanent structures. However we also believe that the revised regulations also need to bring in to consideration the development with modern Recreational Vehicles including Caravans. As we see it the existing regulations centre upon tents and caravans with no inbuilt facilities. The development of modern Recreational Vehicles has seen more and more becoming self-sufficient [self-contained] with inbuilt ensuite, laundry facilities and solar power. The needs of travellers in these modern Recreational Vehicles are minimal; essentially all they need is a safe place to park with access to potable water and a dump point to dispose of their black and grey water.

The revised regulations need to consider these requirements with only essential hygiene and safety considerations.

## Section 8 - Building Standards and Safety

As consumers this is an area that has potential impact on all Recreational Vehicle travellers and one in which we are not qualified to comment apart from saying that we would expect that all developments consider reasonable work health and safety considerations should accompany all development applications as well as establishing workable guidelines for complying developments.

The ACC appreciates the opportunity to provide input into this discussion paper and would also appreciate the opportunity to participate in any future working groups.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'Tom Smith', with a horizontal line underneath.

Tom Smith  
Chairman  
7 December 2015



## Exhibit A - Australian Caravan Club ACCESS

### ENVIRONMENTALLY SAFE SCHEME

#### The ACCESS Code of Conduct

1. The ACCESS Code of Conduct has been developed as a Club initiative to assist Members to understand their rights and also the privileges they enjoy in independent camping. Central to the Code is the concept of self-containment as defined later. As important, in many respects, are other elements of the Code which require that members act as responsible citizens wherever they utilise roadside rest areas, authorised stopovers or other independent camping areas, whether or not self-containment is a requirement of the campsite or rest area.

#### The Rights of the Travelling Public

2. The requirement, of the travelling public, for overnight rest areas and the desire of many to occasionally spend short periods camped away from commercial camping facilities is recognised and supported by the Australian Caravan Club Limited (ACC).

#### ACC Supports the Local Authority

3. The ACC supports the right of State and Local Government authorities to impose realistic conditions on the use of overnight and short-term camping sites, by all sectors of the travelling public. It is realistic to require that travellers respect the facilities provided and, where there are none that they conform to basic requirements for containment of waste and limitation of impact on the environment.

#### The Self Containment Concept

4. The ACC defines a self-contained member caravan, or camper trailer, as one which, amongst other things:
  - is equipped to meet the washing and sanitary needs of the occupants for a given period, depending on the caravan or trailer design and utilisation,
  - carries fresh water for personal consumption, cooking and ablution,
  - contains appropriate storage for waste water, both “grey” and “black until these can be properly disposed of at an authorised facility, and
  - provides temporary storage of kitchen and other waste.



## Guidelines for Self-Containment

5. While some member caravans or trailers may have a fixed self-containment capability, others can be made self-sufficient and self-contained for varying periods. These capabilities may be temporarily or permanently upgraded, depending on the proposed use of the caravan or trailer. Some member's caravans or trailers may have no self-containment facilities. The ACC cannot therefore require a universally applicable period of self-sufficiency.

The following guidelines may be used in calculating self-containment capability:

- |                     |                                                                                                                          |
|---------------------|--------------------------------------------------------------------------------------------------------------------------|
| a. Fresh water      | 10 litres per person per day                                                                                             |
| b. Grey Water       | 5 litres per person per day                                                                                              |
| c. Black Water      | 5 litres per person per day                                                                                              |
| d. Cassettes        | 3 litres per person per day                                                                                              |
| e. Domestic garbage | A sealable container (or garbage bag) which adequately contains waste and odours, until it can be correctly disposed of. |

## Regulation of the Code of Conduct

6. The ACC, in establishing the ACCESS Code of Conduct, intends it to be implemented through self-regulation. A formal process of "certification" is seen as providing a snapshot of capability at a particular time. Certification, *per se*, is a declaration of capability and not necessarily of intent. The ACC believes that the requirement for members to assess capability and review the Code of Conduct, on each occasion that they wish to operate away from established facilities, will constantly reinforce the value and importance of this environmental initiative. The Code covers matters beyond "containment"

## Responsibilities of Members

7. The ACC imposes on Members wishing to utilise rest areas, authorised stopovers or other camping facilities, (where the regulating authority demands self-containment), a requirement to recognise, and accept the ACCESS Code of Conduct. Where containment is required by the regulating authority, Members are to comply with specified conditions. Members, who accept the ACCESS Code of Conduct, are to display the ACCESS sticker on the door of the caravan (or similar position on a camper trailer) as a notification to authorities of a capability and intent to comply with camping conditions and minimise impact on the environment. A completed copy of the ACCESS Code of Conduct (in effect an agreement between the ACC Member and the relevant authority) should be available for viewing if required.

## Availability

8. Members wishing to participate in the ACCESS scheme must apply to the ACC Secretary using the ACCESS Application Form, which is available on the ACC Web Site and from the ACC Secretary. An administrative charge of \$7 will be made for this service and this amount should be forwarded with the application. On receipt of the completed form, the ACC will record Members' details in Register of ACCESS Applicants and return a copy of the Code of Conduct and an ACCESS sticker to the member.