

ADVENTURES ON PRIVATE LAND



Carlie Ryan – Team Leader

Department of Planning & Environment – Housing Policy

GPO Box 39 Sydney

NSW 2001

11th December 2015

Re: Youcamp Submission - Review to improve the regulation of manufactured homes and estates, caravan parks and camping grounds

Dear Carlie,

We are writing to provide a written response to the discussion paper for the review to improve the regulation of manufactured homes and estates, caravan parks and camping grounds in NSW.

1.0 Introduction

We are an industry body called Youcamp.com. Youcamp is a travel website connecting travellers and hosts/tourism operators across Australia. Youcamp was built in 2012, launched in 2013 and has approximately 400 properties listed.

Youcamp has recently partnered with the largest leisure retailer in Australia - Super Retail Group – the owner of some of Australia’s best known leisure retailing brands; Ray’s Outdoors, BCF (Boating, Camping & Fishing) Rebel and Super Cheap Auto. Super Retail Group (ASX:SUL) is a \$2.24 billion dollar leisure company. In 2014/15, the net profit after tax was \$106.3 million. Super Retail Group employs 12,000 staff across Australia, New Zealand and China. We are the original owners of Youcamp and are now the managing directors.



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2.0 Background

Domestic and international travellers are increasingly seeking out more authentic, less crowded, camping experiences – particularly if they are self-contained. Landowners in regional areas are also looking for ways to diversify their income. The “share economy” is one way for landholders to make their properties more economically sustainable, which was one of our primary goals when we established our website.

Since Youcamp was launched, we have received hundreds of enquiries from frustrated landholders right across NSW (and Australia) asking for advice on how to proceed with their Local Council to accept self-contained visitors. For NSW, we have been referring people to the LG Regulation which provides for some minor exemptions as detailed in the discussion paper.

In 2014, we wrote to every Local Council in NSW and across Australia to seek input on the regulatory and legislative framework in each region to support landholders wanting to use Youcamp. We received many replies from NSW Councils. Most of them were positive about the benefits of short term stays on private land but felt confined by the LEP template in which they have to operate. Some of the Councils contacted us for advice on using market tools like Youcamp to address illegal RV parking in their towns but have been unable to find a solution. Byron Bay Council made the strongest progress and started a project called the ‘Freedom Camping Trial’.

Unfortunately, the regulatory and legislative framework in NSW has fallen a long way behind developments in private land tourism. Governments are uncertain about how to deal with small-scale tourism on private land because much of the governing policy is geared towards old-fashioned ideas of camping – medium to large van parks on one side and overcrowded and regulated public campgrounds on the other.

3.0 National issue

Drive tourism is now a massive industry in Australia and Youcamp’s business success essentially demonstrates the popularity of ‘authentic’ tourism sites. A large number of ‘authentic’ sites exist on private rural land whereby the nature of the visit is often proudly non-commercial and therefore, attracts many partially or fully self-contained travellers.

<http://www.queenslandcountrylife.com.au/story/3403479/rv-tourism-and-farming-a-good-fit/?cs=4733>



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In each state, governments are trying to find solutions to the number of RV travellers moving through their regions. We have written to each State Planning Minister requesting meetings on this issue and we've had meetings with the WA, Victorian and NSW governments with positive feedback. At each meeting, there is a clear need to understand the difference between travellers who want to use traditional caravan parks/camping grounds and those travellers who don't. We also followed and provided a submission to the NSW Government 'Inquiry into Tourism in Local Communities' which formally recommended 'the need to develop guidelines around camping in self-contained recreational vehicles' (Recommendation # 16).

There are 'hotspots' all around the country where towns are struggling to find the right balance for self-contained RV visitors. One such hotspot is Noosa Shire Council in Qld. In Noosa, the town centre becomes jam packed with RV travellers who park illegally and disrupt residents. They don't use the town's caravan parks but Noosa Mayor Noel Playford asked his strategic planners to consider in detail the technical issues needed to accommodate this market (instead of viewing them as a liability).

The result shows incredible foresight with the creation of 'Self-contained RV overnight areas' on rural stays being "private premises used for the parking of self-contained RVs, for a maximum of 4 consecutive nights, where no water is provided and no liquid or solid waste is left or disposed of on site, with a maximum of 5 caravans or recreational vehicles parked on site at any one time". Most importantly, the new local laws have allowed the landholder to be self-assessable dependent on the land zoning.

When we met with the Qld Department of Planning in October to present the 'Noosa' example as a way forward for all of Qld, there was wide support and we are working with them now to help draft a guideline for their Minister to consider. Overall, it was agreed that self-contained vehicles are inherently low risk and by their nature may not even be considered a 'camper' in the traditional definition of managing impacts.



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4.0 International examples

Self-contained drive tourism is well established in many European countries, in the US and NZ. Examples of websites include:

<https://www.france-passion.com/en/>

<http://www.okay2stay.co.nz/index.php>

<https://www.hipcAMP.com/>

5.0 Solutions

We provide the following specific solutions to bring NSW in line with the progress made in other states on this issue.

5.1 Extend the current LG Regulation

We believe this policy should be extended to ***allow a land owner to offer a site for 7 nights in any 28 day period, with a maximum of 3 caravans or recreational vehicles parked on site at any one time. No water is provided and no liquid or solid waste is left or disposed of on site.***

This proposed exemption will address long weekends and school holiday periods. We also believe that this provision would allow landholders to accept visitors on a very small scale that poses very minor risks to health, safety and environmental values. The guests will be self-contained to comply with the regulation and landholders will use market-based solutions to both advertise to guests and to protect themselves against liability claims.

We believe that travellers who are self-contained, have virtually no impact on a site. The 'Leave No Trace' principles and definition have been adopted at a national level by many organisations including the leading and oldest motorhome club – the Campervan & Motorhome Club of Australia (CMCA). The CMCA formalised the Leave No Trace principles into a program in order to demonstrate to federal, state and local governments that self-contained vehicles do not have a negative impact on the environment.



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LNT accreditation is available to all owners of qualifying self-contained RVs who are members of an RV club, including companies that hire self-contained RVs in Australia.

We also believe that landholders should be encouraged and supported to offset farming activities with tourism income. And the main message we get from new hosts is the fear of spending large capital outlays and dealing with lots of Council enforced regulations in order to even start a very small scale tourism operation. Our proposed exemption allows landholders to accept visitors on a very small scale only and attract guests who want a budget authentic experience. We believe that once a site is established, becomes popular with guests and could develop into a larger operation requiring infrastructure and facilities (including a primitive camping ground or a larger style caravan park and camping ground) – Council regulations are appropriate. And we believe that landholders are more willing to deal with Council regulations once they understand what tourism model works for their property.

5.2 Simplify the definitions

We support the proposal that moveable dwellings should not include manufactured homes and instead refer to tents, caravans and campervans. Campervans could be replaced with the more broad definition of 'recreation vehicle'.

5.3 Streamlining approvals

We support the view to discontinue the requirement to seek an 'approval to operate' as outlined in the LG Regulation. We believe that having both approvals is onerous on a tourism operator.

We also supported the proposed view that existing operators' approvals should not 'lapse' after 5 years and that a development application in the new framework would only be required when an existing facility was seeking to expand or reconfigure.

5.4 Primitive camping grounds

Primitive camping grounds are growing in popularity. We believe the definition is useful for medium sized natural camping grounds where the guests aren't always self-contained and require facilities.



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For hosts to establish a primitive camping ground for self-contained guests only, this definition is too onerous. Water supply in a remote site would be achieved by a shelter and tank costing \$2000, a basic composting toilet and structure would cost \$2000 and providing bin facilities in remote sites isn't always practical or in keeping with 'Leave No Trace' principles. Self-contained visitors don't need any of these facilities.

The other issue with the primitive camping ground regulations is lack of knowledge by Councils. Primitive campgrounds weren't included in the statewide LEP template as their own definition so unless you do specific research as a landholder, you won't easily find local regulations on establishing one. We had this experience as landholders on the NSW South Coast. Our Council didn't know about the regulation until we provided the link to the planning website and they were able to confirm our site could be treated as a 'primitive campground'.

6.0 Proposed meeting

As previously mentioned, we have already written to the Minister for Planning Mr Rob Stokes where we will raise these opportunities. Ideally, we also seek to meet with staff from the Housing Policy team to discuss the content of this submission in the New Year.

Youcamp is changing the face of tourism in Australia and we are working closely with all levels of Government in each State and Territory to ensure that landholders comply with Council regulations. We are also working closely with the insurance industry to develop a Youcamp insurance scheme and for farm policies to encompass small scale tourism activities such as RV overnight parking.

We look forward to having the opportunity to discuss our business model in more detail and how NSW landholders and how travellers can benefit.

Yours faithfully,

James & Prue Woodford - Managing Directors, Youcamp Pty Ltd.



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