

Improving the Regulation of Manufactured Homes, Caravan Parks, Manufactured Home Estates and Camping Grounds.

Discussion Paper Questions and Answers

1. Yes we agree with the proposed changes.
2. Residential parks 75% - 100% threshold, tourist parks perhaps 50% or less.
3. Yes, with input from existing park operators and local tourism operators.
4. We would ordinarily say option 2, however our local council would make this process extremely difficult.
5. Yes, would help the manufactured home industry evolve, our park is an example that the current approval to operate system isn't working.
6. We don't believe that camping should be a long term residential option, camping should be just that, camping. We need to regulate the length of time as well as designated area to camp, we are seeing more and more people living on the road due to the lack of affordable housing.
7. Self-contained caravans and campervans should only be allowed to free camp in approved designated areas. As mentioned we are seeing more and more people living on the road. Often these campers are unattractive to the eye, we need legislation in place to assist authorities in moving these campers on from at times prime locations.
10. Yes, it should NOT be necessary to constantly renew an approval to operate. Each individual council has an interpretation of the State Government guidelines, in our case Wollongong City Council are extreme with very little flexibility for existing rights.
11. Primitive camp grounds should be defined, they are becoming a more popular part of camping tourism. Having defined areas not only creates a safe haven for campers it prevents people from camping in areas that encroach on public space, beaches, parks etc.
12. Yes we should no longer be required to renew an approval to operate. Council should no longer be required to have regular inspections or in our case detailed audits. Not having a current approval to operate has paralysed us as park operators, council are bleeding us dry of funds with their ever changing demands and residents are unable to make necessary changes and alterations to their homes. This has caused resentment from residents and un-necessary upset.
13. There should be flexibility with existing parks, particularly where a park is operated without a history of incident. There should be exemptions for site ratios, setbacks and separations between homes, some of these homes have been in parks for a number of years and cannot comply under the current legislation. Most of these homes are owned by elderly people, compliance is not only costly it is unrealistic.

14. Yes existing parks should be considered under the new framework for expansion and reconfiguration, however there must be flexibility for the parks existing framework.
15. We agree with the proposed changes, option 2 appeals to our park, if a park is approved using the 75% rule then we shouldn't need development consent for site conversion.
17. Yes we agree
19. Whilst we agree, as mentioned council would need to be flexible with existing parks.
20. Yes we agree, better clarification of definitions is required. It is currently up to individual councils to interpret State Government Regulations. These regulations are in place as a guideline however in our case with Wollongong City Council, our current inspector is an extremist. We have travelled all over the state of NSW comparing tourist and residential parks to ours and are yet to find any operator that is having the same difficulties with their local council.
21. We have found that in many cases residential and tourism doesn't always mix well, therefore camping sites should not be forced to be retained. It seems unnecessary to have to maintain residential sites in amongst tourism and vice versa.
22. No threshold should be set to ensure mix of uses. Our property has been operating since the 60's, we have noticed change from tourism to residential. We have almost no demand for caravan park tourism yet a strong demand for long term residential.
23. I would ordinarily say that individual councils should be able to set threshold however once again in our can I can only imagine the red tap this would create from our experience.
24. This would be suitable in developing areas where there is a shortage of semi long term affordable accommodation. Our property consists of a 30 room motel and we are constantly approached for worker accommodation, our property is rarely suitable because they are looking for accommodation with more facilities. Manufactured homes and cabins are ideal for workers as well as people looking for temporary rental accommodation.
25. Yes but not crippling controls, there is a high demand for safari like accommodation in certain areas.
26. Affordable housing should be available for a broader residential sector, manufactured home should be acceptable on individual land sites. Obviously approval would need to be sort, if a manufactured home was approved for a residential block would this then free up availability for banks to finance these builds, particularly for first home buyers.

On the flip side to this argument, we would like to see a change in current legislation relating to park in flood prone areas. Our park is classed as flood prone due to its close proximity to Lake Illawarra. We are surrounded by privately owned residential homes, we have seen knock downs and rebuilds over the years, all of which are under the same council. The regulations for the installations of manufactured homes in parks are extreme compared to the private build of dwelling. Our council would like to see

manufactured homes placed two (2) meters above ground level yet several blocks up the street a private residence can be built almost at ground level.

27. Manufactured homes should comply with Building Code of Australia.
28. Certification of a manufactured home should be for individual homes during design, build and on completion.
29. Manufactured homes should be subject to certification by a qualified person.
30. Residential homes should meet basic fire safety controls similar to residential homes. Local councils send out regular information packs to residential rate payers regarding fire safety, local info, etc. We would suggest that residents in parks be privy to the same information and updates. Often councils overlook parks and villages on their mailing list when it comes to changes and updates, our council deems that the park operators responsibility to access and supply however sometimes it is not easily accessed.

Parks should meet fire safety requirements for the park and inspected regularly by qualified contractors, not council.

31. Yes, when parks are inspected annually a report is issued, a copy of this report should be submitted by the operator to council for their records. This would make it unnecessary for council to inspect parks for fire safety. (we already do this)
32. We would like to see the same or similar requirements as residential and industry as mentioned in 26 & 30.
33. We would NOT like to see council issue Penalty Infringement Notices, in our case under Wollongong City Council, this would be a major concern. Once again the issue arises for existing parks and operators, it should be noted that often some of the issues in parks are created by predecessors and now are the responsibility of current park operators. Also when positions in council are taken on by a new inspector the interpretation of legislation can be completely different to the previous person.