

**NSW Government Department of Planning and Environment Improving the regulation of
Manufactured Homes, Caravan Parks, Manufactured Home Estates & Camp Grounds**

Campervan & Motorhome Club of Australia Limited (CMCA) response to the discussion paper will only be addressing two areas of the paper; being Caravan Parks and Camp Grounds.

Introduction

The Campervan and Motorhome Club of Australia (CMCA) are the largest structured recreational vehicle (RV) club in Australia with over 66,000 members. Being a not for profit membership based organisation, the Club represents the voice of the travelling consumer on their needs and wants when travelling.

CMCA also has a partnership and are the administrators of a much larger consumer group called RV Clubs of Australia Limited, incorporating a number of other RV clubs including caravan clubs.

CMCA are delighted to be able to give feedback to this discussion paper.

Aim:

CMCA believes the Government has a unique opportunity through this process to solve the problem being created by the rapid growth of Self Contained RV's (Recreational Vehicles). The big issue is to accommodate these travellers for short resting periods during their travels and longer periods at destinations where they want to see the sights on offer at multiple destinations. Local Government has been struggling with this problem for some time with limited success. CMCA acknowledges the problem is only going to become more difficult as baby boomers take to the roads with the reducing number of caravan park sites being available. Caravan parks on prime real estate are being developed and are building more on-site accommodation, thus reducing the number of actual sites available for the RV traveller.

CMCA now sees an opportunity within low cost camping options at caravan parks and camp grounds, and potentially new development of additional camping grounds using the revised provisions for Primitive Camping legislation as long as it is more flexible and user friendly.

Essential:

1. To streamline developing processes
2. To eliminate red tape
3. Ensure the process is fair to all
4. Address the primitive camping legislation

CMCA has carefully identified several components through the discussion paper.

5.2 Approval of moveable dwellings

It is interesting to note that under the Local Government Act, a moveable dwelling is included as any tent, or any caravan, van or portable device (whether on wheels or not) ...

CMCA notes the approval process is not required to act provided the time period is not more than 2 days in any 60 day period over a 12 month period.

- The length of stay needs to be extended, as it does not cater for the visiting friends and relatives (VFR) market (e.g. for family events), event tourism (e.g. where temporary accommodation is required). There are many areas where this is required including annual shows, rallies, festivals, cultural and music events etc.
- Consideration should be given to a 7 day period.
- Consideration must be given in areas where there is a shortfall of commercial accommodation and the requirement to cater for larger numbers is required.
- Extensions should be applicable to busy or peak times.

6. How long should caravans, campervans, or tents be permitted on land outside parks and camping grounds without the need for Council approval?

- A clear definition between camping and resting is required.
- The current legislation does not take into consideration situations that require longer stays on land outside of parks and camping grounds, e.g. family events, event tourism and community volunteering.
- Consideration of at least 7 day stay.
- Self-containment should be preferred. This allows the site to provide minimal infrastructure.
- The current primitive camping act does not identify a timeframe but does restrict the number of vehicles permitted as per hectare of land. Consideration should be given to allow more vehicles under this legislation, rather than less, so more utilisation can take place.

7. How long should the new framework facilitate the use of the self-contained caravans and campervans?

- The need to cater for the self-contained vehicle market is essential. This allows the site to provide minimal infrastructure.
- All that is required to allow this to happen is a flat piece of ground, access to potable water and a dump point. In this new world of self-contained vehicles there is no need for a toilet block.
- Time frame should be at least 7 days.
- Catering for self-contained vehicles comes at a very minimal cost to a local council area.
- CMCA is willing to co-operate with councils in the provision of low cost options for self-contained vehicles.
- Please view CMCA's Low Cost Camping Options Paper (Annexure 1). This explains clearly how local government can cater for the self-contained market - *fastest growing element in RV manufacturing sector*.

9. Are there additional controls that should be included in the new framework to facilitate the development of new tourist parks or residential parks?

- In the current landscape of commercial properties such as caravan parks and camp grounds, more are closing or are being sold for other purposes, rather than being developed.
- A streamlined system is required throughout the development process. This could include administering all aspects of the DA being undertaken through the one area, not several including water, planning, waste, environment, sustainability, lands etc.
- By streamlining the process it is essential that Government look at accommodating more options, catering for this market. E.g. low cost camping and short to mid-term parking.
- Environmental controls ensuring that the needs of the consumer are met within the development.

10. Should new caravan parks, camping grounds and manufactured home estates be subject to a non-off development consent rather than the existing approval to operate provisions?

- Self-containment should be preferred for the area. This allows the site to provide minimal infrastructure.
- Facilities should be minimal in primitive camping areas and through self-containment the majority will have facilities on board. However in saying that, they may need potable water and black and or grey water disposal points.
- The current primitive camping act does not identify a timeframe but does restrict the number of vehicles permitted as per hectare of land. Consideration should be given to allow more vehicles under this legislation, rather than less, so more utilisation can take place.
- Most self-contained vehicles are fitted with fire extinguishers and fire safety equipment. The need for firefighting facilities such as fire reels etc. would not be feasible in a primitive camping area.
- Primitive Camping needs to be addressed as it is defined, “minimal facilities”.
- Self-contained vehicles are environmentally friendly as they “leave no trace”.

11. What other Matters that should be considered in camping grounds and primitive camping grounds approvals? Should ‘primitive camping grounds’ be defined?

- Minimise red tape for non-commercial premises (camp grounds such as show grounds, reserves etc. under the primitive camping legislation)
- Primitive camping could be considered similar to bush camping and made more flexible.
- Minimal compliance required.
- Previously certain design controls were met under the LG regulation, now it is proposed to be included in the form of a guideline.

Summary

- CMCA has addressed the two areas as stated in the introduction, that being Caravan Parks and Camp Grounds.
- The need to open up the use of more land (camp grounds) especially using Crown Land to the community.
- Strong economic opportunity but a flexible regulation is required.

- The regulation should be addressed within the whole legislation. Currently we have two aspects of legislation which are dated:
(1) Caravan Park Act
(2) Primitive Camping Act
- The need to minimise red tape for potential developers.
- Simplify the process for the “users”.
- Alternate camping such as “glamping” can also ready be considered under the RV market. This style of accommodation and travel has been a part of the Australian culture for many years but the standard being provided has risen significantly.
- Commercial caravan parks provide a source of accommodation that varies up to a 5 star facility. Compliance at the lower end of the market urgently needs addressing. The Caravan Park Industry are the first to acknowledge that they cannot ensure compliance from all of their members and it is a worry for the whole industry, especially those who benefit commercially.
- Currently it is up to the Local Government Council to ensure compliance is met, through lack of resources from some Local Government areas, this is not done.

Conclusion

Travellers with self-contained vehicles are demanding the Freedom of Choice as to where they stay on their travels. The caravan parks are not catering to their needs. CMCA constantly hears from its members that they are not prepared to be forced into caravan parks and pay for services they do not require.

By simplifying legislation in regards to the two points CMCA has addressed in this submission, being caravan parks and camping grounds, local government can provide for these recreational vehicle travellers. This will encourage valuable tourism dollars across the state.

CMCA welcome any further dialogue with the Department in relation to the discussion paper. I would like to emphasise the importance of consultation with the travelling consumer, through our large network of members.

I am happy to discuss any of the above with you.

Kind regards



Richard Barwick

Chief Executive Officer