

Ref: D2015/133790

Carlie Ryan
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Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Ryan

Discussion Paper: *Improving the regulation of manufactured homes, caravan parks, manufactured home estates and camping grounds*

I refer to the public exhibition of the above Discussion Paper which identifies a number of proposed changes to the regulation of manufactured homes, caravan parks, manufactured home estates and camping grounds.

Under the *Water NSW Act 2014*, WaterNSW is responsible for managing 42 water storages and associated water supply infrastructure and for promoting catchment health and protecting drinking water quality within the declared Sydney drinking water catchment. Recreation facilities, including camping grounds and caravan parks, are associated with many WaterNSW water storages. These facilities are managed directly by WaterNSW or through lease arrangements with state agencies including NSW Crown Holiday Parks Trust Board, local councils or the private sector.

WaterNSW has an interest in the proposed regulatory changes in the Discussion Paper as an operator of these facilities, and through the potential impacts to drinking water quality in declared catchments.

WaterNSW generally supports the proposed changes to the regulation, including the transfer of regulation from the *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005* (LG Regulation) to the *Environmental Planning and Assessment Act 1979* (EP&A Act), and the consolidation of the provisions of *State Environmental Planning Policy 21 – Caravan Parks* (SEPP 21) and *State Environmental Planning Policy 36 – Manufactured Home Estates* (SEPP 36).

Water NSW provides the following comments relating to specific aspects of the proposed changes.

Section 4.0 Supporting land uses in the right location

WaterNSW supports the differentiation of residential and tourist accommodation. The operation of these facilities in unsewered areas of declared drinking water catchments has potential to impact drinking water catchments and appropriate management of wastewater, including domestic greywater, and stormwater must be considered in planning for these land uses.

Section 5.0 Simplify Approvals

5.2 Approval of moveable dwellings

Any exemptions for the use of moveable dwellings outside a park or camping ground must consider the appropriate management and disposal of wastewater, including domestic greywater. In declared drinking water catchments, the wastewater loading from use of moveable dwellings in unsewered areas must not exceed the approved capacity of onsite wastewater systems.

WaterNSW recommends that strategic planning for tourist accommodation include planning for blackwater disposal facilities at strategic locations for self contained caravans and campervans, and this information be made readily available for users.

5.4 Streamlining approvals to operate for existing caravan parks, camping grounds and manufactured home estates

WaterNSW agrees with the proposal to discontinue the 'approval to operate' requirement under the LG Regulation and replace it with development approval under the EP&A Act and inspections at an appropriate frequency.

WaterNSW supports the inclusion of additional definitions for camping grounds to differentiate the facilities provided and required. 'Primitive camping ground' are not necessarily located in remote or bushland areas. The language in the definitions should reflect the services at the camping ground (such as 'basic' or 'rustic') rather than the characteristics of the locality.

WaterNSW supports inclusion of definitions in the Standard Instrument, rather than relying on a non-statutory guideline, as it provides a more robust framework for considering potential water quality impacts in declared drinking water catchments.

There are a range of recreation facilities associated with water supply storages. For many of these facilities, WaterNSW (as a determining authority under the EP&A Act) is able to undertake a range of routine works and activities without consent (under clause 125(2) of the *State Environmental Planning Policy (Infrastructure) 2007*). WaterNSW requests that consideration be given to expanding the permissibility of uses permitted under clause 125(2) to including camping grounds.

5.5 Transitioning existing estates, parks and camping grounds to a new approvals framework

WaterNSW supports the proposed transitional arrangements for existing facilities, and the requirement for a development application for expansion or reconfiguration of a site.

Further information and clarification is requested in relation to the proposed minimum inspection intervals, and proposed funding for inspections, including for onsite waste water management systems.

5.6 Streamlining approvals through exempt and complying development

WaterNSW recognizes the value of exempt and complying development. In unsewered areas, any change to the intensity of use must consider the potential impact to drinking water quality, the capacity of onsite wastewater management systems and impacts from significant changes to impervious areas.

5.7 The introduction of a Guideline (and Appendix B – Existing provisions to be transferred to a Guideline)

WaterNSW supports the proposal to repeal the LG Regulation and transfer statutory controls to the EP&A Act and, the Standard Instrument with detailed controls in a Guideline. WaterNSW recommends that the provisions in the LG Regulation, particularly in relation to camping grounds and primitive campgrounds are considered for further review.

This review should specifically include the conditions relating to the maximum number of people using a single camp site, the number of moveable dwellings permitted on a camp site and separation distances for moveable dwellings. Specific sections for consideration are:

Clause 121: A maximum site occupancy of 12 persons per site is too large for primitive camping grounds. In most cases, a maximum site occupancy of 6 would better facilitate social amenity and sustainability. Temporary increases (to 12 persons per site) may be appropriate in peak periods but should be subject to assessment of facilities and amenity.

Clause 132: The calculation of the number of tents and the separation distances required are complex and difficult to enforce in the field. WaterNSW recommends providing greater flexibility around the number of structures permitted per camping site, separation distances between camping sites and separation distance between structures within a camping site. WaterNSW also recommends allowing camping ground owners to determine what constitutes a site and the number of structures permitted on any site within the camping ground.

WaterNSW requests the opportunity to have further involvement and input to the development of the Guideline, particularly in relation to the provisions for camping grounds.

Section 6.0 Promote Diversity of Housing

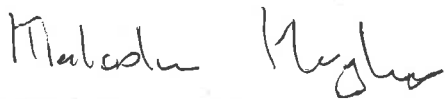
6.1 Providing for a diversity of residential and tourist uses within parks &

6.2 Seasonal and itinerant workers accommodation

The management of wastewater must be considered in any changes in intensity of land uses. In unsewered areas the approved capacity of the onsite wastewater management systems must not be exceeded by any changes in use or temporary accommodation.

Please contact Rachel Hannan, Senior Land Use Planner, on 4724 2278 if you require further information or in relation to the development of the proposed Guideline.

Yours sincerely



MALCOLM HUGHES
Manager Environment & Planning

14/12/16

