

Beckingham, Vanessa

From: Crystal Bell [crystal.bell@dlgrd.wa.gov.au]
Sent: Tuesday, 19 May 2009 10:02 AM
To: Committee, Economics & Industry Standing
Subject: CPCG Submission

Attachments: CPCG Submission Scanned Copy.TIF



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Dear Dr Abernethie

Please find attached an electronic copy of the Department of Local Government and Regional Development's submission to the Economics and Industry Standing Committee's Parliamentary Inquiry into the Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia. A hardcopy has been sent in the post and should reach you shortly.

Thank you for the opportunity to contribute.

Kind Regards,
Crystal Bell
Research Officer
Policy
Department of Local Government and Regional Development
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Abernethie, Loraine

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Government of Western Australia
Department of Local Government and Regional Development

Your Ref: EISC/CCI/Sub
Our Ref: 326-98#17 D0901494

Dr Loraine Abernethie
Principle Research Officer
Economics and Industry Standing Committee
Parliament House
PERTH WA 6000

Dear Dr Abernethie

Thank you for your letter dated 19 March 2009 regarding the Economics and Industry Standing Committee's Parliamentary Inquiry into the Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia.

The Department of Local Government and Regional Development (DLGRD) is pleased to provide comment on the regional implications of current trends in the caravan park and camping ground sector, legislative issues and background information on a survey currently being conducted on caravan parks and camping grounds in local government areas.

Please contact Ms Crystal Bell on phone 92171565 or email crystal.bell@dlgrd.wa.gov.au should you require any further information or clarification of this submission.

Jennifer Mathews
DIRECTOR GENERAL

19 May 2009

Att

PROVISION, USE, AND REGULATION OF CARAVAN PARKS AND CAMPING GROUNDS IN WESTERN AUSTRALIA

REGIONAL IMPLICATIONS

Caravan parks and camping grounds in Western Australia service a diverse range of regions, including coastal and inland shires, urban and rural populations and exist as both highly developed or nature based entities. Traditionally, they have been an important element of Western Australia's accommodation profile with wide ranging impacts on tourism, industry, housing and associated social factors.

Caravan parks offer a mix of facilities including camping, permanent and holiday caravan and cabin facilities which cater for both short term and long term occupants. Occupants include tourists, lower-income residents (including, in some cases, crisis accommodation) and itinerant workers. Whilst many caravan parks are owned and operated privately, many are also run by local government authorities.

Background

Caravan parks were traditionally intended, and primarily used, for short stay holiday accommodation. However, the reality is that caravan parks are now increasingly used for affordable and crisis housing including worker accommodation, particularly in the Pilbara, leaving little or no capacity to for tourism activities.

It is recognised that demand for this type of accommodation will increase due an aging population reaching retirement, sea changers and the desire for more affordable accommodation to holiday at home in the current economic climate.

This is coupled with the trend within caravan parks to upgrade accommodation which puts pressure on the availability of low cost housing and tourism options. Increased land values are also influencing owner decisions to move owners from low return uses, such as a caravan park, to high return uses, such as short stay units and private permanent residential units or lots. Over time, the amount of budget style accommodation has reduced.

There is concern that other tourist accommodation, such as motels, will also be redeveloped in a similar way as developers seek to convert a percentage of sites to high value residential zoning, with no occupancy restriction.

Caravan parks are typically located in desirable coastal or waterfront locations and are targeted for redevelopment into resort style accommodation. Due to a combination of rising land values and increased operating costs, including maintaining existing infrastructure, many caravan parks across the State have either been closed or sold to developers. This is an Australia wide phenomenon and is expected to continue into the future.

The continued existence of caravan parks and camping grounds as affordable holiday and tourism options is an integral component of regional economies. The traditional location of parks in attractive, accessible areas is part of their attraction and benefit, however, these locations are often the ones under most pressure for redevelopment.

Impacts

Regional Development Commissions have provided DLGRD with the following examples of the impacts that the changing occupancy in caravan parks and camping grounds is having in their regions.

Tourism

Estimates of the percentage of caravan sites in the Peel region available for tourists range between 15 – 21% as accommodation is occupied by semi permanent to long term residents, including itinerant workers.

Similar feedback from the Gascoyne region suggests that while the structure, conduct and performance of the caravan park industry in the region is sound, there are overflow issues, with Exmouth and Carnarvon's facilities showing signs of future high demand.

In particular, Exmouth and Coral Bay experience significant overflow during peak holiday periods. While the Shire of Exmouth provides an overflow site, Coral Bay does not have such facilities. This can pose issues for the travelling public who are forced to continue on for long distances if they have not prearranged accommodation. In the case of Exmouth, a visitor who is unable to secure accommodation in Exmouth or Coral Bay would be required to travel 377km to Carnarvon. As these visitors may have already travelled from Carnarvon, Geraldton or Perth that day, their ability to safely operate a vehicle for another four hours is a concern.

Although overflow sites are generally made available by local governments, they generally have limited facilities and do not provide an amenable tourism experience. For example, the Broome racetrack is made available by the Shire of Broome as an overflow caravan park during peak times.

Affordable Housing

Increasingly, Caravan parks serve as affordable accommodation options for workers. In particular, the Pilbara region has experienced extraordinary growth due to the expansion of the resources sector, which has impacted substantially on availability of tourism accommodation.

Caravan parks fill an important economic need in providing accommodation for workers who may only be required on a temporary basis and would be unlikely or unwilling to secure rentals in the normal market.

Given the high demand for accommodation in these towns, caravan parks and hotels have been brought out by companies for use as worker accommodation. Whilst planning requirements for properties include quotas to

be made available to the public and/or tourists, Tourism WA has suggested that it is likely that much of this would be booked out for contractors and their staff.

The loss of caravan parks impacts severely on availability of affordable housing. In recent years affordability and security of tenure for long-stay caravan park tenants has decreased as rising land values and increasing operating costs has lead park owners to close, sell their parks to land developers or increase pricing.

There is also concern that the sharp increase in WA land and house prices, even though it has moderated recently, has meant an increasing number of residents who use caravan parks for permanent residence. The closure/redevelopment of caravan parks has increased the waiting list for public housing, which is already in short supply.

A significant pressure on tourist accommodation in the City of Albany includes the caravan sites that are used for alternative accommodation. Planning controls in the City are broadly based on a range of tourism accommodation and development opportunities. Even though such semi-permanent accommodation does exist, the notion of caravan parks as an alternative affordable housing option does not enter into the current planning focus; it is just a by-product.

Feedback from the Peel region indicates that of the remaining caravan parks the trend is a shift away from long-term permanent accommodation to more profitable seasonal tourist accommodation. These trends are resulting in the erosion of low-cost accommodation options for those seeking permanent/semi permanent places to live and current occupants face insecurity of tenure. For some, living in a caravan park is their only accommodation option and have nowhere else to go if their caravan park is closed.

Crisis Accommodation

Caravan parks meet an important need in providing short-term crisis accommodation for those who need immediate refuge, such as the temporarily homeless and people escaping domestic violence. The closure/redevelopment of caravan parks causes a *Catch 22* situation and impacts on the ability to provide this critical accommodation which exists where no other accommodation is available.

CARAVAN PARKS AND CAMPING GROUND SECTOR

The Caravan Park and Camping Ground Industry report the following set of issues which affects their ability to remain viable:

- Substantial and/or increasing overheads, especially for non metro facilities.
- Managing seasonal variation in demand for caravan park facilities.

- Rising land values together with a broad zoning which enables easy redevelopment of sites.
- Ability to access to funds for refurbishment/redevelopment of ageing parks.
- Concern that the costs of meeting government standards and regulations are now pushing pricing up.
- Shire and State regulations limiting capacity to add additional accommodation to take advantage of the opportunities presented by the mining boom.
- Land tax charges in relation to caravan parks only providing a 50% reduction and only once the park is fully developed.
- Attraction and retention of staff (compounded by the inability to provide accommodation as part of the employment package).
- Recognition that caravan parks are part of a bigger tourism industry and further co-operation of all industries needs to be fostered.
- A belief that there should be more done by local government to support caravan parks and caravaners, e.g. parking for vans, unhitching areas, mosquito control, signage etc
- Concerns about implications of providing social housing by default and dealing with the associated social and tenure issues.
- Legislation preventing park operators from removing undesirable tenants from the park without lengthy and expensive legal procedures.
- The need for infrastructure such as sealed roads to provide access for people with vans.
- Caravan operators generally report that opportunities have been lost due to inability to expand cabin/chalet type facilities due to a combination of local and state government regulations.

In examining these industry issues in the context of the need for Caravan parks to remain viable for reasons described in the Regional Implications section of this paper, the following initiatives have been identified:

- Assistance with headworks charges.
- Provision of additional infrastructure by the State to support development of facilities.
- Support to raise finance for investment in facilities.
- Alternative tenure arrangements.
- Short stay tourist accommodation that would not be assessed as individual units.
- Deferral arrangements in respect to State taxes.
- Strategies to remove or reduce land tax (State Tax Review 2006 provided 50% concession to caravan parks).
- Reduction of rates provided by the application of differential rating by local governments as an incentive to develop and maintain caravan parks.
- Ensure that appropriate zoning for caravan parks and camping grounds and park homes are maintained under town planning schemes.
- Both Local and State Government could set aside areas for temporary parks if necessary.

- Where possible, existing zoning for *Caravan Parks* or *motels* should be retained. Rezoning of part of these sites could provide for part of the site to be used for financially more attractive developments, such as park homes or units while retaining the remainder for traditional caravan park use.

LEGISLATION

National Competition Policy (NCP) Legislation Review

The NCP review of the *Caravan Parks and Camping Grounds Act 1995* and associated Regulations undertaken by DLGRD was approved by the then Minister for Local Government and Regional Development in October 2003. In accordance with State Government processes, the review report was considered by the Expenditure Review Committee at its meeting of 31 March 2004.

The review recommended that section 3(1) of the Act be amended so that the statutory exemption of State Government agencies from compliance with the licensing provisions of the Act be removed.

In addition, the review also recommended that regulation 49, which prohibits the issue of a license for a transit park or a nature based park if there is a licensed caravan park or camping ground within 50 kilometres, be removed and that a set of minimum standards for nature based parks become legislative provisions. These standards would address matters such as health, safety and amenity.

DTF and DLGRD agreed that the amendments required would be included with the amendments that arose from the 2005 statutory review of the Act (outlined in the next section).

Review of Caravan Parks and Camping Grounds Act 1995

In line with the requirements of the *Caravan Parks and Camping Grounds Act 1995*, DLGRD commenced a review of the operation and effectiveness of the Act in 2005. The review process included the public release of a discussion paper, of which 102 submissions were received from a range of stakeholders. This included local governments and their representative associations, recreational and industry caravan and camping groups, State Government agencies and members of the public.

This review resulted in a number of proposed amendments to the Act and associated Regulations. The general intent of the amendments proposed is to improve the operational efficiency, particularly for local governments to administer the Act.

On 22 October 2007, Cabinet approved the drafting of amendments to the *Caravan Parks and Camping Grounds Act 1995*. A summary of the proposed amendments is provided in Attachment 1.

In relation to the proposed amendment to section 3(1) regarding State compliance with the Act, Cabinet resolved that this amendment could not take effect until standards for nature based parks run by the then Department of Environment and Conservation (DEC) had been developed. Subsequent to this decision, DEC agreed to develop these standards and it is understood that DEC is still progressing this matter.

Furthermore, licensing and inspection responsibilities are not to be undertaken by local governments. DEC and DLGRD agreed that the choice of a licensing body for DEC facilities will be made at the time guidelines for nature based parks are developed.

DLGRD subsequently provided drafting instructions to Parliamentary Counsel to assist with the preparation of an Amendment Bill. Due to more pressing legislative priorities of the previous Minister, a draft Bill was not developed.

Caravan Parks and Camping Grounds Regulations 1997

Similarly, due to other priorities of the then Minister, the Regulation amendments that arose from the review of the legislation have not been progressed.

SURVEY - IDENTIFYING THE CARAVAN PARKS AND CAMPING GROUNDS IN WESTERN AUSTRALIA

On the 2 March 2009 the Department of Local Government and Regional Development developed and sent out a survey to all local governments in Western Australia requesting that they identify all the caravan parks, camping grounds, roadside rest areas and dump points within their jurisdiction. The closing date was 30 April 2009. To date the Department has received 62 surveys with 77 still outstanding and is following these up with all those local governments yet to respond.

This is a particularly busy time for Local Government and it is not surprising that there has been a delay in responses to the survey. The Department envisages that these surveys should all be returned by the middle of June, with the information to be compiled to create a comprehensive resource on the caravan park and camping ground sector in Western Australia.

Attachment 2, for your information, is the survey template. The Department of Local Government and Regional Development will provide you with the compiled data once it is available.

SUMMARY OF THE PROPOSED AMENDMENTS TO THE CARAVAN PARKS AND CAMPING GROUNDS ACT 1995

Regulation of caravan parks and camping grounds

- Removal of requirement to forward prohibition notices to the Department of Local Government and Regional Development.
- New requirement for inspection reports carried out on local government operated facilities to be endorsed at a local government council meeting.

Powers of entry and inspection

- Allow for classes of local government officers, such as environmental health officers, to be appointed as authorised persons, rather than just individual officers as is presently the case.
- Clarify that authorised persons have the power to enter the private land that a caravan or camp is located on.

Enforcement

- Increase the penalty for camping illegally to \$2,000.
- Increase the penalty for obstructing an authorised person to \$10,000.
- Increase the modified penalty for failing to comply with the various duties of licence holders prescribed in section 13 to \$200.
- Provide the power for the date of birth to be recorded on an infringement notice.

Where people may camp

- Amend the definition of 'camp' and 'camping' to include a 'verb' component. This is to assist with determining when the act of camping is taking place.
- Provide head of power to regulate the number of campers that are able to occupy an individual property.

Delegations

- Provide power for a local government council to delegate its powers under the Act to its Chief Executive Officer.
- Provide power for the Minister to delegate his or her powers under the Act to the Director General of the Department of Local Government and Regional Development.

**Department of Local Government and Regional
Development**

Survey

**Caravanning and Camping Facilities within
Local Government District**

GENERAL SURVEY

CARAVANNING AND CAMPING FACILITIES WITHIN LOCAL GOVERNMENT DISTRICT

City / Town / Shire of _____

1. Do you (ie, does your local government) have any policies on the provision of caravanning and camping facilities? Tick the appropriate box. ☒

Yes ☐

No ☐

If yes, can you provide an overview?

2. Do you consider existing facilities sufficient to meet current demand in terms of both residential accommodation and sites for travelling caravanners and campers?

Yes ☐

No ☐

Do you expect existing facilities to increase or decrease in the next 2 - 3 years?

3. Do you provide any short term parking facilities for campers in transit (eg, for travelling caravanners to park while shopping)?

Yes ☐

No ☐

If yes, can you provide details of the locations and any amenities?

4. Are you considering the future provision of caravanning and camping facilities?

Yes ☐

No ☐

If yes, can you advise of potential facilities and locations?

5. Are you considering the future provision of roadside rest areas or dump points?

Yes ☐

No ☐

If yes, can you advise of potential locations?

Thank you for taking the time to complete this survey. Please return, along with any forms relating to individual facilities, to Merja Stockton at the Department of Local Government and Regional Development at GPO Box R1250, PERTH WA 6844, by fax to 9217 1555, or by email to merja.stockton@dlgrd.wa.gov.au.

FORM 1 LICENSED CARAVAN PARKS AND CAMPING GROUNDS (Please complete one form for each facility. Please photocopy this form as many times as required.)

City / Town / Shire of _____

Note: This form is to be used for caravan parks and camping grounds that have current licences in accordance with Schedule 2 of the Caravan Parks and Camping Grounds Regulations 1997, or are in the process of being licensed.

1. What is the type of licence for the facility? Tick the appropriate box. ☒

- | | |
|---------------------------------|--------------------------|
| Caravan Park | <input type="checkbox"/> |
| Camping Ground | <input type="checkbox"/> |
| Caravan Park and Camping Ground | <input type="checkbox"/> |
| Park Home Park | <input type="checkbox"/> |
| Transit Camp | <input type="checkbox"/> |
| Nature Based Park | <input type="checkbox"/> |

2. Is the facility a strata titled park?

Yes ☐

No ☐

3. Name and address of the facility:

4. Name of the licence holder:

5. What best describes the status of the land on which the facility is located? (If a lease, indicate if possible the tenure.)

- | | |
|---|--------------------------|
| Freehold | <input type="checkbox"/> |
| Owned by the local government | <input type="checkbox"/> |
| Owned by a State Government agency | <input type="checkbox"/> |
| Other, including lease (please explain) | <input type="checkbox"/> |

6. What best describes the type of camping at the facility? Tick any appropriate.

	Vehicles	Tents
Passing travellers (eg, overnight)	<input type="checkbox"/>	<input type="checkbox"/>
Stays of one week or less	<input type="checkbox"/>	<input type="checkbox"/>
Stays of more than one week	<input type="checkbox"/>	<input type="checkbox"/>
Seasonal long term stays	<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain)	<input type="checkbox"/>	<input type="checkbox"/>

7. Number of sites for caravans, other camping vehicles or park homes:

Permanent residential sites	<input type="text"/>
Semi-permanent residential sites	<input type="text"/>
Short term on-site accommodations	<input type="text"/>
Short term sites for travelling vehicles	<input type="text"/>

8. Number of sites appropriate for large self-contained camping vehicles:

9. Number of sites for tents and other camping:

10. Number of cabins, chalets or other accommodations not on licensed sites:

11. Number of overflow sites:

Vehicles	<input type="text"/>
Tents	<input type="text"/>

12. Can you provide an indication of annual occupancy levels if available?

<p align="center">FORM 2 OTHER CAMPING AREAS (Please complete one form for each area. Please photocopy this form as many times as required.)</p>
--

City / Town / Shire of _____

Note: There may be areas in your district where people traditionally camp or stay for a night or longer while travelling to another place. Typically these areas are located near bodies of water, such as rivers, lakes and coastal areas, or near roadside rest areas. Further, some are located on farms and pastoral properties where the owner or occupier does not object to the camping (or actually charges for such use), some may be eco parks run by the State Government, and some may be locations available occasionally as temporary licensed facilities. Some have minimal services such as rubbish bins, fireplaces or barbecues, and tables and benches.

1. Common name for the camping area: _____

2. Description of the area (eg, eco park): _____

3. Details of the location: _____

4. How is the area accessed? Tick the appropriate box. ☒

- | | |
|-------------------------|--------------------------|
| Bitumen | <input type="checkbox"/> |
| Gravel or graded access | <input type="checkbox"/> |
| Track | <input type="checkbox"/> |

5. Approximate size of the area: _____

6. What best describes the status of the land on which the area is located? (If a lease, indicate if possible the tenure.)

- | | |
|---|--------------------------|
| Freehold | <input type="checkbox"/> |
| Owned by the local government | <input type="checkbox"/> |
| Owned by a State Government agency | <input type="checkbox"/> |
| Other, including lease (please explain) | <input type="checkbox"/> |

7. What best describes the type of camping at the area? Tick any appropriate.

	Vehicles	Tents
Passing travellers (eg, overnight)	<input type="checkbox"/>	<input type="checkbox"/>
Stays of one week or less	<input type="checkbox"/>	<input type="checkbox"/>
Stays of more than one week	<input type="checkbox"/>	<input type="checkbox"/>
Seasonal long term stays	<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain)	<input type="checkbox"/>	<input type="checkbox"/>

8. Is the owner or leaseholder of the land allowing the land to be used as a camping area?

Yes ☐

No ☐

9. If yes, how is permission given?

Sign	<input type="checkbox"/>
Written	<input type="checkbox"/>
Verbal	<input type="checkbox"/>
Other (please explain)	<input type="checkbox"/>

10. Does your local government provide services to the area?

Yes ☐

No ☐

11. If yes, what are the services provided?

Rubbish bins (with lids)	<input type="checkbox"/>
Rubbish bins (no lids)	<input type="checkbox"/>
Tables and benches	<input type="checkbox"/>
Barbecues	<input type="checkbox"/>
Firewood	<input type="checkbox"/>
Toilets	<input type="checkbox"/>
Signposting	<input type="checkbox"/>

Ranger services

☐

Other (please explain)

☐

12. If the area is not signposted would the Shire be prepared to erect signs (in cooperation with owner or occupier) that outlined the rights and responsibilities of the campers?

Yes ☐

No ☐

<p style="text-align: center;">FORM 3 ROADSIDE REST AREAS (Please complete one form for each area. Please photocopy this form as many times as required.)</p>

City / Town / Shire of _____

Note: The Caravan Parks and Camping Grounds Regulations 1997 state that people can camp for 24 hours in a caravan or other vehicle in a designated roadside rest area. Local governments can designate such an area on roads or other land that they control.

1. Common name for the roadside rest area: _____
2. Details of the location: _____

3. Who provides the rest area? Tick the appropriate box. ☒

- | | |
|------------------------------|--------------------------|
| Local government | <input type="checkbox"/> |
| Main Roads Western Australia | <input type="checkbox"/> |
| Other (please explain) | <input type="checkbox"/> |

4. What are the services provided?

- | | |
|--------------------------|--------------------------|
| Rubbish bins (with lids) | <input type="checkbox"/> |
| Rubbish bins (no lids) | <input type="checkbox"/> |
| Tables and benches | <input type="checkbox"/> |
| Barbecues | <input type="checkbox"/> |
| Firewood | <input type="checkbox"/> |
| Toilets | <input type="checkbox"/> |
| Signposting | <input type="checkbox"/> |
| Ranger services | <input type="checkbox"/> |
| Other (please explain) | <input type="checkbox"/> |

<p align="center">FORM 4</p> <p align="center">SANITATION DUMP POINTS</p> <p align="center">(Please complete one form for each facility. Please photocopy this form as many times as required)</p>
--

City / Town / Shire of _____

Note: Throughout the State there is considerable difference in the interpretation of sanitation (black water) disposal units or dump points. These vary from 100mm upstand pipes with screw cap top situated 1 metre above ground and emptying into a holding tank, to modern high impact UV stabilised ground level units. Many older caravan parks have used mop and bucket disposal troughs located inside laundry facilities, providing disposal points for portable toilet holding tanks or similar. As parks are upgraded, provision is being made for self-contained vehicles with built in grey and black water holding tanks. These units allow the vehicles to drive alongside and empty the contents into the unit by gravity feed.

1. Location of the dump point: _____

2. Who provides the dump point? Tick the appropriate box. ☒

- | | |
|------------------------------|--------------------------|
| Local government | <input type="checkbox"/> |
| Main Roads Western Australia | <input type="checkbox"/> |
| Other (please explain) | <input type="checkbox"/> |

3. What best describes the type of dump point?

High impact ground level unit with sealed caps ☐

Upstand pipe into pumped out holding tank:

with sealed caps ☐

without sealed caps ☐

with wash down facility ☐

without wash down facility ☐

Simple concrete circle on top of concrete pad:

with sealed caps ☐

without sealed caps ☐

with wash down facility ☐

without wash down facility ☐

4. How is effluent disposed of?

Sewer ☐

Septic system ☐

Below ground holding tank ☐

5. Who can access the dump point?

General public ☐

Paying customers only ☐

Residents of a facility only ☐