

**Abernethie, Loraine**

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**From:** Michael Ross [Michael.Ross@rockingham.wa.gov.au]  
**Sent:** Friday, 15 May 2009 4:21 PM  
**To:** Committee, Economics & Industry Standing  
**Subject:** FW: TRIM Document : D09/36111 : Parliamentary Inquiry - Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia

**Attachments:** D09 36111 Parliamentary ~ Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia.DOC



D09 36111  
Parliamentary ~ Pro

Copy for your information.

Original copy has been posted.

Regards

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-----Original Message-----

From: Michael Ross  
Sent: Friday, 15 May 2009 4:16 PM  
To: Michael Ross  
Subject: TRIM Document : D09/36111 : Parliamentary Inquiry - Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia

laeisc@parliament.wa.gov.au

-----< TRIM Record Information >-----

Record Number : D09/36111  
Title : Parliamentary Inquiry - Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia

Our Ref: CUS/7-12

Your Ref: EISC/CCI/Sub

Enquiries to: Mike Ross

14th May 2009

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

Dear Dr Abernethie

**Re: Parliamentary Inquiry - Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia**

Thankyou for the opportunity to provide the City's comments to the Economics and Industry Standing Committee on the provision, use and Regulation of Caravan parks (and Camping Grounds). I apologise for the delay in responding to you. The City has considered this matter and provides the following comments.

Existing Situation

The City of Rockingham currently has five Caravan Park sites within the district as follows:

1) Cee & See Caravan Park site	101 Long Stay, 15 Camping (Short Stay), 12 Overflow
2) Lakeside Caravan Park, Baldivis	59 Long Stay, Nil Short Stay, Nil Overflow
3) Palm Beach Caravan Park Site	163 Long Stay Nil Short Stay Nil Overflow
4) Rockingham Holiday Village	148 Long Stay 30 Short Stay
5) RSL Caravan Park Site, Rockingham	51 Long Stay 7 Overflow

A Location Plan for each Caravan Park is attached.

In summary there are 522 long-stay use (permanent occupation) Park Sites and only 64 Short-stay use (tourist accommodation) and overflow sites. In other words 89% of the park sites are for long-stay use and only 11% of park sites are short-stay use.

Three of the above Caravan Park sites may be redeveloped in the future.

The Palm Beach Caravan Park site is zoned 'Special Use 1' in Town Planning Scheme No.2 and is zoned 'Urban' in the Metropolitan Region Scheme.

The City has received informal enquiries from the owner about the prospects of redeveloping the Caravan Park but at this stage a proposal to rezone the site to 'Residential' has not been received.

The Rockingham Holiday Village on Dixon Road in East Rockingham is zoned 'Special Use 7' in Town Planning Scheme No.2, which recognises the Caravan Park. The amenity of this caravan park site may ultimately be impacted by future industrial development associated with the development of land within WAPC Improvement Plan No.14 - East Rockingham Industrial Area.

The RSL Caravan Park site is also a park site that is affected by the proposed Cape Peron Tourist Precinct Project, which is administered by the Rockingham-Kwinana Development Office. A number of proposals have been developed for a marina-based tourist and residential development immediately to the east of the Garden Island Causeway.

The Cee & See Caravan Park is situated on Governor Road, East Rockingham and is owned by Co-operative Bulk Handling. The site is zoned 'Special Use 2' under Town Planning Scheme No.2, which recognises the Caravan Park. This site has views towards Garden Island and has direct beach access, but is adjacent to the CBH facility. In recent years, CBH has upgraded facilities within the park site.

The Lakeside Caravan Park site on Mandurah Road, Baldivis is zoned 'Special Use 8' under Town Planning Scheme No.2. This park site is predominantly long-stay and is not located in an area with direct access to tourist attractions such as beaches, but is situated in a pleasant rural setting.

#### Supply and Demand for long- and short stay sites including camping sites.

The presence of Caravan Parks and camping grounds within Rockingham is important for tourism, but the presence of long-stay use impacts on the extent of short stay accommodation available. There may be broader social economic reasons behind the preference for long stay accommodation.

The Rockingham Tourism Office has suggested there is a growing demand for short stay accommodation within the City of Rockingham. The shortfall in supply of Caravan Park sites may have contributed to holiday homes and apartments being offered for rent to fill the tourism accommodation gap, but these are not always in ideal coastal or convenient locations.

The Council has also considered three separate proposals by National Lifestyle Villages to establish village communities within the Baldivis locality. Two NLV proposals were granted Planning Approval by the Council, however, the third proposal was withdrawn by NLV. The first NLV project 'the Vibe' was recently opened in Baldivis, and may ultimately be developed for 330 long-stay use Park sites.

Impact of existing legislation, and state and local government policies regulating caravan parks

The City is guided by the WAPC Planning Bulletin for Caravan Parks but does not have a Local Planning Policy for Caravan Parks.

The City's Building Services has provided the following comments as they specifically relate to the Caravan Park & CG Act & Regulations.

Caravan Park & CG Act & Regulations permit the permanent occupancy of caravans as habitable spaces (habitable rooms is the term used in the BCA). These habitable spaces do not comply with the minimum room size (ie ceiling heights BCA Vol 2 Clause 3.8.2.2 "Ceiling heights must be not less than 2.4 metres" (there some exclusions for specific rooms). This would make an easy argument for a reduction in the minimum room heights in the BCA.

The Caravan Park & CG Act & Regulations is in a format all of its own and this makes it difficult to read and interpret. For example, the definitions are in Schedule 8, and then there are some other definitions within the text in various places, when in most other Acts it is in the first section.

The Regulations do not adequately cater for Park Home Villages (such as National Lifestyle Villages). Many requirements of a Caravan Park (eg ablution facilities, recreational facilities for children etc) are not appropriate for an over 55's lifestyle village yet there are no specific exemptions.

Maintaining a viable caravan park industry

It is important for all forms of Government Regulation to support existing and future Caravan Park sites in the form of suitable zoning in Town Planning Schemes, Local Tourism Strategies, Concessional Tax Rates for operators and other incentives to retain and attract new tourism operators into the market. Without financial and planning incentives for Caravan Park operators, they may consider redevelopment options instead.

Protecting the rights of operators and users

The protection of the rights of operator and park users is an important issue. On the one hand operators should have the ability to effectively manage Caravan Park sites, while park users should have security of tenure. The City is aware of the growing need for changes in legislation that provide more security of tenure to park users and this may take the form of longer notice periods from operators for users to vacate, or minimum length of stay to give more security to users.

Providing an adequate mix of long and short stay facilities and sites

This is a difficult issue as it is suspected there will be variations that occur between Councils on what constitutes the most appropriate mix between long-stay and short-stay facilities. The City is aware of the need for the retention of Caravan Parks and the position of the WAPC which considers the issue of percentage of permanent residential accommodation is a matter for Local Governments on a site-by-site basis.

While I appreciate the above comments are brief, it is hoped that the Committee will still find these useful.

The City understands the implications of making this submission are that this correspondence attracts parliamentary privilege and is the property of the Legislative Assembly.

If you have any questions in relation to the above matter, please do not hesitate to contact Mr Mike Ross on 9528 0334.

Yours Sincerely

R M JEANS  
DIRECTOR, PLANNING  
& DEVELOPMENT SERVICES