

CCI Sub 54



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**FROM:** DANIEL SIMMS, CEO, CITY OF WANNEROO  
**FILE REF:** S40/0009V01 (798854)  
**DATE:** 1 May 2009 **NO. PAGES:** 8 (Including cover sheet)

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**PARLIAMENTARY INQUIRY – PROVISION, USE AND REGULATION OF  
CARAVAN PARKS (AND CAMPING GROUNDS) IN WESTERN  
AUSTRALIA**

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Please see attached letter.

Kind regards,

Linda Easson  
ADMINISTRATION OFFICER  
CITY OF WANNEROO



File Ref: S40/0009V01 (798854)  
Your Ref: EISC/CCI/Sub  
Enquiries: Pas Bracone - 9405 5512 or Paul Winton 9405 5410

29 April 2009

Dr Loraine Abernethie  
Principal Research Officer  
Economics and Industry Standing Committee  
Level 1  
11 Harvest Terrace  
WEST PERTH WA 6005

Dear Dr Abernethie

**PARLIAMENTARY INQUIRY - PROVISION, USE AND REGULATION OF  
CARAVAN PARKS (AND CAMPING GROUNDS) IN WESTERN  
AUSTRALIA**

Thank you for the invitation for the City of Wanneroo to make a submission to the Parliamentary Inquiry - Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia.

In general, the City considers the regulation of the caravan park industry has been working reasonably well. There are, however, a number of concerns that are detailed below for the Committee's consideration.

Firstly, the impact on local government is quite significant. Unlike other statutory legislation that falls within local government jurisdiction, section 21 of the Caravan Parks and Camping Grounds Act requires that a local government inspect each facility within its district at least every 12 months. Whilst local governments routinely carry out inspections of various premises to ensure compliance with numerous statutes, no other legislation is as onerous as the above mentioned Act. In fact, most other statutes allow local governments powers of entry to inspect premises, but do not require it a necessity to inspect. It is left up to each local authority to determine what is suitable or otherwise. Furthermore, some facilities may comprise of a significant amount of sites, thereby making it difficult for authorised officers to carry out the inspections. In practice, a representative number of sites may be inspected rather than the entire facility. It is felt that the Act should be amended to remove the compulsory inspection provision

Secondly, the City has concerns regarding the lack of building approval required for homes built on caravan park and camping grounds facilities. It is considered that, given the evolving construction of modern mobile homes and to ensure consistency with building control for other types of construction, it would be preferable for such homes to be legislated by the Local Government (Miscellaneous Provisions) Act

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1960, which deals with building control and safety related matters concerning residential construction.

Also, please be advised that the use and development of caravan parks, camping grounds and park home parks in the City of Wanneroo is controlled under the provisions of District Planning Scheme No. 2 and the City's Caravan Park, Camping Grounds and Park Homes Parks Policy. The Planning Scheme can be accessed on the City's website at [www.wanneroo.wa.gov.au/3/494/1/district\\_planning\\_scheme\\_pm](http://www.wanneroo.wa.gov.au/3/494/1/district_planning_scheme_pm). A copy of the policy is enclosed for the Committee's information.

Should you require any further information, please contact Pas Bracone, Manager Planning Services at [pas.bracone@wanneroo.wa.gov.au](mailto:pas.bracone@wanneroo.wa.gov.au) or on telephone number 9405 5512.

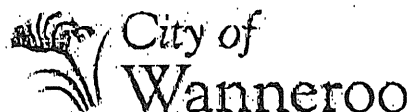
Further, for your information, the City is the owner and operator of a caravan park at Quinns Rock. Any enquiries in this regard can be directed to Paul Winton on telephone number 9405 5410 or at [paul.winton@wanneroo.wa.gov.au](mailto:paul.winton@wanneroo.wa.gov.au).

Yours faithfully



Daniel Simms  
**CHIEF EXECUTIVE OFFICER**

Enc. City of Wanneroo Caravan Park, Camping Grounds and Park Homes Parks Policy



# Policy Manual

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## Caravan Park, Camping Grounds and Park Home Parks

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**Policy Owner:** Planning and Development

**Distribution:** All employees

**Implementation:** 14 March 2000

**Reviewed:** 14 December 2004

**Next Review:** December 2006

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### Objectives

The objectives of the policy are:

1. To facilitate the provision of caravan parks and camping grounds providing accommodation for tourists in a manner such that:
  - there is an adequate opportunity for such accommodation in the City;
  - such facilities are located in a manner to complement existing and planned tourist/recreation facilities in the City;
  - environmental, social and physical planning principles are complied with.
2. Facilitate the provision of parks for permanent living in a manner such that:
  - adequate opportunity is provided for those seeking this type of housing;
  - residents have access to facilities and services normally expected by urban residents;
  - environmental, social and physical planning principles are complied with.
3. To recognise the role of and to supplement the Caravan Parks and Camping Grounds Act (1995) and Caravan Parks and Camping Grounds Regulations (1997).

### Definitions

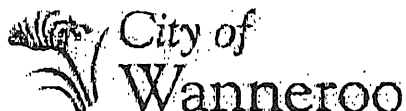
1. "park(s)" referred to in this policy includes caravan parks, camping grounds and park home parks.

### Statement

In considering applications for Parks, Council should have regard to the following matters:

#### 1. *Environmental Considerations*

- (a) Parks should not have an adverse impact upon:



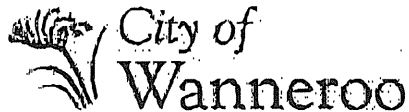
## Policy Manual

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- areas of regionally significant native vegetation as defined by Perth's Bush Forever, and areas of locally significant native vegetation as determined by Council;
  - National Parks and Conservation Parks;
  - the 200m zone of secondary influence for conservation category wetlands, or the 50m zone of critical influence for other wetlands, the boundaries of such zones being delineated on maps contained in the publication "Wetlands of the Swan Coastal Plain" (1996) Volume 2b produced by the Water and Rivers Commission and Department of Environmental Protection;
  - areas within which there are karst formations; and
  - established coastal Parks and Recreation and/or other coastal reserves; in the event that there is not a Coastal Reserve or the existing reserve does not extend sufficiently inland, development will not be permitted west of the interdunal swales between the tertiary and secondary dune system.
- (b) In accordance with Water and Rivers Commission, Water Quality Protection Note regarding land use compatibility in public drinking water source areas, caravan parks are regarded as generally incompatible in priority 1 and priority 2 source protection areas and regarded as a restricted use in priority 3 source protection areas (conditional upon effluent disposal being provided for in accordance with the Government Sewerage Policy). Under this Policy, priority 3 source protection principles apply to any areas not within designated Underground Water Pollution Control Areas.
- (c) Parks will not be permitted within areas determined by the Council to be at risk or potential risk from flooding or waterlogging. In general such areas should be regarded as those designated as Basin and Flat Wetland on maps contained in the publication "Wetland of the Swan Coastal Plain" (1996) Volume 2b produced by the Water and Rivers Commission and Department of Environmental Protection.

### **2. *Impact on the Human Environment***

- (a) Council will determine the need to assess the potential impact of traffic generated by the development of a new park, or extension to an existing park. Traffic generated by the development should not result in an adverse impact on the human environment.
- (b) The development of a park will have a density ratio not exceeding the ratio applicable to Residential Code R40.
- (c) The development of a park site should occur in such a manner as to protect the amenity of adjacent properties from any excessive noise generated by the activities within the park.



## Policy Manual

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- (d) The development of a park site should occur in such a manner as to protect the amenity of adjacent properties from any light spill generated from within the Park.
- (e) All applications received by Council for developments under this policy will be subject to a public consultation process.

### **3. *Social and Community Considerations***

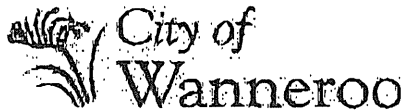
- (a) Park operators providing long stay sites should ensure the provision of access to adequate community facilities and services i.e. local shops, educational institutions, recreational /open space facilities, children services and community hall/meeting rooms.
- (b) Parks providing short stay sites should be placed in close proximity to existing and planned tourist and recreation/open space sites and include the provision of access to local shops and public transport.
- (c) Applicants may satisfy the policy measures set out in 3. (a) and (b) by providing on-site facilities and/or transport to such facilities. Such provisions will be negotiated with applicants and secured as a condition of planning approval. These conditions will only apply until such facilities become accessible within close proximity.

### **4. *Local Rural Strategy***

- (a) When considering applications for parks, Council will have regard to the intent of the policies in the Interim Local Rural Strategy.
- (b) In particular, Council will have regard to the impact of parks on the General Rural Zone and the Rural Resource Zone. As such, parks will be considered "sensitive uses" and Clause 3.17.2 (h), (i), (j) and (k) of the City of Wanneroo DPS No.2 will apply in considering applications for Parks.

### **5. *Mix of Long Stay and Short Stay Sites in Parks***

- (a) Council will ensure that caravan parks located in areas of high tourist amenity (as determined by Council) provide and maintain an adequate amount of short stay sites. Having regard to the requirement for viability referred to in 5 (b) below, existing caravan parks should retain short stay sites and proposed caravan parks should maximise the number of short stay sites with a minimum 40% of the total sites for short stay purposes. This minimum percentage may be varied according to the merits of each application.



## Policy Manual

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- (b) Council acknowledges the need for long stay sites in caravan parks in order to ensure their viability. Council will evaluate the mix between long stay and short stay sites proposed for parks, at the time of application, in accordance with site and surrounding land characteristics and other clauses contained in this policy, and where necessary in consultation with caravan industry experts.

### 6. *Site Design Considerations*

- (a) **Landscape Buffer Area**

Parks should be developed in such a manner as to minimise adverse visual impact on the surrounding environment.

As such, parks located adjacent to rural land should have a landscape buffer area along all external boundaries of the site and should measure 15 metres width along any road frontage and 7.5 metres adjoining any other boundary. Parks located in urban areas should have a landscape buffer area of 6 metres width along any road frontage and 3 metres adjoining any other property.

Depending on the design and utility of the buffer areas, the 10% recreation space as required by the Caravan Parks and Camping Grounds Regulation (1997) may include landscape buffer areas only in applications that can clearly display to the satisfaction of council that the buffer areas are useable for recreation purposes.

- (b) **Street Layout**

Council will prefer a connective road pattern in order to ensure pedestrian permeability and manoeuvrability of caravans in parks.

- (c) **Ancillary Shop**

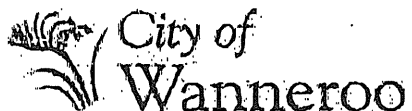
Shops provided on site should be ancillary to the caravan park and/or park home park use and should be designed, located and operated to meet the needs of residents. Such an ancillary shop shall not have a floor area greater than 100m<sup>2</sup> per 400 park residents.

- (d) **Sewer**

Effluent disposal should be provided in accordance with Government Sewerage Policy (Perth Metropolitan Region).

- (e) **Courtyard Space**

Each long stay site should have a courtyard area within reasonable access from an indoor living area and of useable dimensions and area.



## Policy Manual

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(f) Clothing Drying Areas

Each long stay site should have an adequate area set aside for clothes drying, located away from view from any communal and public places.

(g) Bulk Garbage Storage

Provision on site should be made for either on-site or bulk storage of waste. A plan for removal of waste should be submitted to Council.

### **Responsibility for Implementation**

Manager Development and Health Services