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To: Committee, Economics & Industry Standing
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Dear Dr Abernethie,

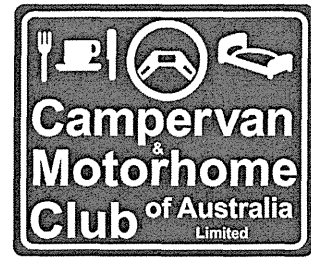
Pls find attached a submission with respect to the Inquiry into the Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia conducted by the EISC. The submission is forwarded on behalf of The Campervan and Motorhome Club of Australia (CMCA), Australia's largest single RV Club or Association of RV Clubs.

A hard copy will follow per Australia Post today.

**Kind regards
PhilC**

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ABN 16 095 568 157

Submission to:

***The Economics and Industry Standing Committee
inquiry into the Provision, Use and Regulation of
Caravan Parks (and Camping Grounds) in Western
Australia***

Submission by:

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Type of organisation

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Mission Statement

The Campervan and Motorhome Club of Australia Limited (CMCA) objectives are to promote the motorised campervan, motorhome and Recreational Vehicle industry in Australia, support tourism and economic growth, and ensure the industry remains sustainable and environmentally sound.

Purpose of this Submission

To address the Terms of Reference adopted by the Economics and Industry Standing Committee.

This submission will include

1. Past and current 'camping' requirements
2. The impact of the new technology recreational vehicles on the Caravan Park market
3. The need for Caravan Parks to embrace change in order to remain viable
4. The absolute need for the development of rural WA tourism to take up the loss of Caravan Park sites in popular on coast destinations.

The CMCA

Established in 1986, the Campervan and Motorhome Club of Australia Limited (CMCA) is the largest Recreational Vehicle (RV) club in Australia, with in excess of 53,600 Members, and an average of 500 new Members joining each month. More than 4,000 Members reside in Western Australia.

In WA the CMCA membership outnumbers the combined membership of the Caravan Clubs of WA by more than two to one.

CMCA has taken the initiative in encouraging Local and State Governments to cater for the new generation Recreational Vehicle traveller. The term 'Grey Nomad' tends to be a misnomer when applied to this group as a whole.

CMCA in WA is working with Local Government and Main Roads WA to subsidise and install roadside infrastructure for the modern traveller. CMCA has been jointly responsible for the installation of more than 60% of publicly accessible sanitation waste disposal units in WA.

Caravan Parks do not generally make such units freely available to the new generation traveller: CMCA is working to fulfil that need.

Preamble

Currently, Western Australia in general does not meet the needs of the self-contained RV traveller market. There is, owing to the current lack of budget provisions within Main Roads WA, and the WA Caravan Parks & Camping Grounds Act Regulations, a severe shortage of rest areas throughout the State that are able to meet the requirements of the rapidly growing self-contained RV market.

Hence, Western Australia is seen as being 'unfriendly' to these travellers compared to states such as Queensland and Tasmania who pointedly provide for these travellers.

The issue here is not people, but lack of suitable facilities.

Motorhoming is the fastest growing segment of the tourism industry in Australia today. Tourism proponents generally accept that there are in excess of 440,000 RV units registered across the country, and estimate that an average of 80,000 are 'on the road' at any given time.

Domestic and international travellers in RVs are spending in the vicinity of \$6.5 billion dollars each year. Tourism Research Australia figures show that these travellers accounted for 53 million nights in caravan and camping accommodation in 2006.

Approximately 90% of all campervans and motorhomes, and an increasing number of caravans are fully self-contained.

That is, they carry fresh water, have holding tanks for grey and black water (sanitation) waste, generate their own electricity via solar panels or a generator, and have the capacity to hold all household garbage on board.

RV travellers are seeking experiential drive tours with a mix of low and medium service camp sites where costs reflect the level of services required. Consequently this market is best serviced through a network of commercial caravan parks, private property arrangements, and sites in public areas including rest areas, showgrounds and National Parks.

The needs and preferred experiences of the RV self-contained segment are evolving in a different direction to the character and services offered by caravan parks. The number of mobile travellers is increasing, and recreational vehicle manufacturers, through improvements in technology, are producing a wider range of more self-contained vehicles.

Travellers are looking for some or all of the following attributes:

- A range of camping options - including budget options.

- Access to shopping and dining with easy access for their new technology vehicles.
- Minimal on-site services - maximum access opportunities.
- Australiana experiences, especially overseas visitors in RVs.
- Eco locations and informal environs for bush camping.
- The company of like minded and similarly outfitted neighbours.
- Access to potable water supplies, and waste disposal points
- Pet friendly locations.

Recent public debate on the use of public areas and roadside rest areas for bush camping and special arrangements developed with local governments to provide low cost camping sites to RV visitors has highlighted that:

- current policies on rest areas are inconsistent within and across Australian States,
- the use of public areas is being negotiated on an ad hoc and inconsistent basis across regions; and
- management of the supply of camping accommodation lacks a co-ordinated approach that involves all stakeholders.

CMCA has formed individual and mutually beneficial partnerships with over 350 Caravan Parks across Australia.

This program, known as CMCA Friendly Caravan Parks, caters for the full range of RV services at similar discount rates to those available to commercial franchises like Big4 memberships.

Park rates are structured to meet market needs

CMCA provides advertising to its Members; Parks provide discounts.

There are no other demands on either party.

Where Parks are unable to meet the needs of semi-trailer sized rigs owned by our Members, this is noted in the program park's promotional material, unlike Caravan Park literature that tends to avoid this negative, thereby contributing to considerable disillusionment among vehicle owners.

CMCA's submission to this inquiry into the Caravan Park industry will promote the pressing needs of the consumer without whom there would be little need for Caravan Parks to exist, other than for public housing purposes.

(1) Structure, conduct and performance of the caravan park industry.

Structure

Post WWII, Camping was the quintessential family holiday; tarpaulin tents tied over location supplied wooden frames and little else outside a set of public toilets and cold showers. Kids met other kids, they played marbles in the dirt, swam in secure beach locations, and mums, dads and kids took away wonderful holiday memories

Mid 1950s there was a family move to towing small Caravans as motor vehicles became more available; this led to a demand for removal of the tent frames to be supplanted by parking bays with the addition of a tent annex. Families still enjoyed holidays in the same location

Facility demand became more sophisticated. Toilets, hot showers and laundries became essential infrastructure.

This expansion of facility requirements often led to greater demands on Shires and Municipalities.

As numbers increased, entrepreneurs stepped in, and commercial caravan parks as we know them today were born.

Along the way there has always been demand for change in this industry, leading to Shires and Municipalities in most cases having to carry the financial burden in order to hang onto family holiday makers and their dollars.

Once protectionism of the Caravan Park Industry in WA and elsewhere gave the entrepreneur a free run at the mobile travel industry, the evolution of Caravan Parks meeting and keeping abreast of traveller demand stopped.

Conduct

Caravan parks are now evolving to accommodate higher yield markets by converting more sites to cabins, providing more upmarket services and facilities and allocating more long term resident sites. (In 2006 there were approximately 151,000 permanent residents in caravan parks across Australia).

Anecdotal evidence leads us to believe that between 1,000 and 2,000 caravan park sites converted to residential units or cabins have been lost to the RV market in Western Australia in recent years. We further suspect

similar numbers have been lost to developers for commercial uses other than in Caravan parks

The conversion of many sites to Chalet accommodation in coastal and iconic location Caravan Parks to meet the much higher yield passenger vehicle market, reduces the available space for mobile tourists, on each occasion by more than two transit bays per construction.

The loss of so many sites reduces the capacity of existing Caravan Parks to meet the seasonal demands of the market; this in turn forces prices beyond a level that many RV tourists are willing to pay.

To address the price issue, consumers vote with their feet or wheels as the case may be. They seek alternate accommodation in rural and outback WA.

WA could be a mecca for mobile tourism. It could be known locally and internationally as the RV Friendly State. Coastal Caravan Parks would then get a share of an increasing market as would Regional WA's tourism.

Performance

A large percentage of Caravan Parks in WA are unable to meet the size requirements of new technology caravans and motorhomes (a semi-trailer is an adequate comparator). Most have made no attempt to seriously look at these new market demands which were predicted between 5 & 10 years ago by Tourism WA, Tourism Research Australia et al. When access is possible, these larger size vehicles are very often charged for two sites located at the very back of the Park - out of the way.

Caravan Parks are only now beginning to realise that they must change 1960's thinking for 21st Century reality and provide for these new technology vehicles that are fully self-contained and capable of standing alone from 1 to 14 days.

Caravan Parks have for many years been protected by Reg 49 of the Caravan Parks & Camping Grounds Regulations 1997 which limits the issue of licences for alternative long and short term accommodation to 50km.

The WA Caravan Industry Assn, in their report to members following the 2008 Caravan & Camping Show in WA, highlighted Park inadequacies under the heading 'Is your Park a dinosaur?'

There are no restrictions on Caravan Parks to convert a complete Caravan Park over to non transit accommodation, which in turn leads to Caravan Parks continuing to be sold at a regular rate.

In the meantime, self-drive tourists have little option but to find suitable rest areas in locations off the coast.

Rural WA is the natural provider to this market, however they require a considerable amount of tourism and professional support to sustain such a tourism based market

Anomaly

The inclusion of Life Style Villages in the Caravan Parks & Camping Grounds Act 1995 is an anomaly highlighted in the previous paragraph; they were never intended by creators to be a Caravan Park catering for mobile RV-centric tourists.

Lifestyle Villages and Caravan Parks are two different entities best addressed as such. One is tourism based; the other is alternate housing.

(1) Demand, supply and costs, and trends thereof, of caravan park sites and related services.

Many caravan parks cannot accommodate large RV 'rigs'. Overhanging trees, restricted turning circles and narrow roadways, make it impossible to manoeuvre large vehicles 'on site'. Many of these vehicles can be the same length as a flat bed semi trailer, and are up to 19.5 meters in length. They require a turning circle up to 35 meters, and a height clearance of 4-4.5 meters.

During peak holiday periods, caravan parks are often fully booked, and under the current legislation, this leaves mobile travellers with no alternative but to travel at least a further 50 kms to a rest area, if there is one, and in many cases there isn't. Fatigue therefore becomes a very important road safety issue in such instances.

Support for low cost Travellers Rest Areas, or 'Overflow' locations nearby is essential.

A section of Park owners are not satisfied unless the fees charged in minimal facility rest areas are the same as their fully serviced caravan park. There is no like for like competition in such circumstances; one provides a high level of service, the other almost no service at all with conditional access.

Park owner opposition in many cases is extremely vocal when such alternative issues are raised; a case of 'all my way or none at all'.

Such minimal facility rest areas will certainly be in a position to offer carbon offsets when carbon trading becomes a reality.

Demand

This growing RV market brought on by new retirees will continue to place high seasonal demands on caravan park accommodation. Out of season demand is commensurate with the prevailing community attitude toward RV travellers. WA is not an RV Friendly State and so repeat demand, the lifeblood of the industry, will dry up.

Many retirees have yet to become familiar with unsecured travelling and camping regimens and will continue to seek the safety and comfort of caravan parks.

Park owners will need to respond to this demand with better targeted arrangements for site costs commensurate with services supplied and required; the 'take it or leave it' policy is no longer acceptable in the face of current technology.

The family holiday previously referred to is continually on the wane with respect to caravan parks, and so parks have become resorts in an attempt to attract more families to stay longer/take more holidays etc.

In their attempts to address this issue, the higher cost structure to the provider which is then passed on to the consumer, have become counter productive.

Kids no longer play marbles in the dirt and teenagers are no longer drawn to old hat lights and whiz-bang electronics, and families want value for money.

The family holiday is no longer an 'in thing' for city teenagers whose families provide the bulk of this market; however a targeted sensible approach to retirees will help to counter this forward trending decline.

Fuel, economy and levels of income for most RV owners have always had some effect, seldom however greater than 5-10% and only over short peaks and troughs.

Supply

Supply in WA fell away very seriously with the boom period 2006-7 & 8 with parks becoming the de facto public housing supply. In one particular case, two caravan sites fell to mining companies; one in the regional town

or city and the other near the 'on site' location to be used as 'single men's quarters'.

At least one caravan park was purchased to house the workforce in Pt Hedland, creating a crisis in traveller accommodation right at that critical destination point in a very long journey

Seasonal demand revolves around too hot, too cold, too wet, and too dangerous. The window of opportunity in some locations is between 12 and 20 weeks, whilst in most others, 40 weeks is very capable of promotion.

Demand by retirees is built around short distances and stopping often. Three or four hours is an optimum travel distance and at a very leisurely pace and with regular breaks. The 'annual holidays' rush from point A to point B no longer applies to the majority of RV travellers.

This travel pattern has real strong implications for rural WA with many small Caravan Parks dotted across the landscape.

To 'camp' legally, travellers may have to travel several hundred kilometres, especially in the northern regions of the State. This is not in the interest of road safety, and it certainly does not put the 'welcome mat' out to our visitors. Legislation needs to be changed to remove the restrictions on the creation of alternative sites.

Land Release vs. Available Land

When undertaking planning studies of unallocated State owned land, consideration needs to be given to determining what quantity of that land is suitable for setting aside as land reserved for the accommodation of self-contained RV's.

While Caravan Park owners continue to seek alternative income support through sale or conversion, the modern traveller is quietly seeking through representative organisations, alternatives to Caravan Parks.

There are a number of showgrounds throughout the State that are mainly used for only a small number of days each year for local shows and events. These make ideal locations for rest areas for self-contained mobile travellers.

With a nominal fee attached for the privilege of being able to stay overnight in Traveller Rest Areas with minimum facilities available, there are three major benefits for the local community:

1. The fees collected can be put towards the maintenance of the grounds and buildings.

2. The presence of mobile travellers on the site is a proven deterrent against vandalism.
3. By providing accommodation for these travellers, the local business community benefits from their spending which approaches \$100 per day.

When it comes to the fee factors, many caravan park owners want to charge travellers in a fully self-contained vehicle, the same fees as those for travellers in non self-contained vehicles who want and use all available services.

Travellers in self-contained vehicles seldom need to utilise the majority of facilities provided by a caravan park, apart from the coin operated laundry, which in many cases is also the local community laundrette. Most facilities are superfluous. They have already paid for these facilities at the time they purchased their travel/accommodation unit.

(2) Supply and demand for long-and-short-stay sites including camping sites.

Supply

Supply, particularly future supply, is highly dependent upon attitudes within WA toward the future growth of RV Tourism.

For travellers who wish to visit WA for the first time, the current supply of coastal caravan parks will suffice. For repeat visitations, WA will have to look to their merits and improve the 'sales network' of rural visitor centres.

Tourism WA has helped support iconic tourism like Wave Rock, Broome, and so on, but has done little to ensure the real WA sales network of little visitor centres is supported, promoted and trained for tourism.

Country Shire owned, and to a lesser degree private enterprise operated Caravan Parks, when supplemented with alternate accommodation facilities, is capable of relieving coastal demand. Such action will also create a longer more regular all-round season.

WA's 'Royalties for Regions' will undoubtedly upgrade our much needed rural infrastructure, but without a financially viable and well supported VIC network to provide regional tourism promotion, WA will not draw the necessary mobile traveller numbers to maintain either a coastal Caravan Park network, or a regional Caravan Park Network.

Long and Short Stay Sites and Camping.

Bush camping has long been considered an Australian 'right', even more so now that proper sanitation is contained within the vehicle; domestic rubbish, grey water and black-water, or sanitation waste, all go off site under the Leave No Trace Code of Conduct being promoted by Caravan Clubs and CMCA

There is a tradition among responsible campers that they clean-up before they set-up and before they leave

There are a number of reasons why RV travellers do not wish to stay in caravan parks every night.

The majority of them have fully self-contained vehicles, even though some may only have the capacity to eco camp for a day or two.

They do not need to purchase services they are already enjoying, just like an Egg Producer doesn't need to buy eggs every time he/she goes to town and would resent being made to do so; so too do modern self-contained travellers.

Most caravan parks capable of providing accommodation for self-contained units still insist on charging a full rate. They neither do themselves nor the WA community in which they reside a service.

The maxim 'get ripped off in WA' is well known across the RV community.

In light of this, Caravan Parks need to change their business model to realistically serve the modern traveller.

Many Local Government Authorities throughout Australia now provide 24/48/72+ hour stopover areas for self-contained vehicles. This has come about with the realisation, that by providing these rest areas they are encouraging travellers to stay in their Shire and spend their dollars within the Shire business community.

Shire Councils across Australia have been instrumental in opening many local showgrounds and disused football ovals as short and long term Traveller Rest Areas.

Many of these areas are available only to self-contained vehicles conforming to Leave No Trace principles, owing to the lack of infrastructure in place.

Some areas attract a fee for service when staying there, and some operate on a permit system issued at the visitor centre or Shire office, with or without a fee being charged.

Research commissioned by CMCA in 2008 shows that mobile self-contained travellers will on average spend 1 in every 3.5 nights in a caravan park.

(3) Impact of existing legislation, and state and local Government policies regulating caravan parks, particularly relating to:

- maintaining a viable caravan park industry**
- protecting the rights of operators and users**
- providing an adequate mix of long-and short-stay facilities and sites.**

We have throughout this submission emphasised the establishment of 'Out of Park and within Park' accommodation variations acceptable to the new technology RV tourist.

We believe that 50% or more of the currently WA registered (DPI 2008) 41,000 caravans and 95% of the 7,000 motorhomes are fully self-contained.

Inter-state visitors approach the upper limit of self-containment.

Hire vehicles owned by hirers such as KEA, Apollo etc, at that particular end of the hire market are 100% self-contained

The CMCA collective of privately owned members' vehicle fleet has an insurance value of \$1.65b. On average the collective value of all RVs and attendant vehicles parked within a Caravan Park, well exceeds the value of the Caravan Park. 200 bays at an average RV price of \$100,000 per bay, far exceeds the value of most Caravan Parks of that or any other size.

The Consumer and the Proprietor therefore have equal stakes when it comes to protecting each other's financial investments, rights and obligations.

There is no clearly defined emergency stopping/camping regulations contained within the current CP & CG Act, and these need to be re-established so that harmful tales of Proprietors and Shire Rangers harassing sleeping RVers cease. WA's reputation is at stake and such attitudes do WA more harm than good.

The Caravan Parks and Camping Grounds Advisory Committee established by legislation, is endeavouring to address some of these issues and has been for years; ongoing delays of this nature are very detrimental to WA's reputation both interstate and internationally in this segment of the market.

CMCA will continue to poll its Members and commission research to present as much factual evidence as possible throughout its various submissions to Governments of all persuasions.

CMCA Members through the CMCA Friendly Caravan Park scheme of arrangement continue to have a stake in keeping Parks viable.

Summary & Recommendations

The uniqueness of the product that Western Australia offers the tourist industry is extremely important. The natural environmental assets throughout the State should be marketed to all aspects of the tourism industry. After all, it is one of the great marketing opportunities that are not necessarily available to other States.

There are areas and attractions that are unique to Western Australia, and these should be highlighted in any promotional campaign. Survey after survey indicates visitors want to visit 'Australia' and our unique country side, its animals, flora and especially our mammals.

TourismWA has a tendency to only see the glitz and glamour of coastal WA and the very tight south-west corner

Many of WA's other attractions are able to be accessed either by a guided tour, or by unrestricted access by the mobile/self-drive tourist direct.

Local government itself should not only be encouraged, but be encouraging of tourists to enter their local area, then stay and enjoy these attractions.

Heavy promotion through their local Visitor Information Centres (VIC) and the provision of appropriate accommodation for all tourists, including the RV market, is an absolute necessity. VIC voluntary staff training is essential

Under current legislation, a Council is restricted in providing a licensed eco-park or low cost rest area for self-contained vehicles within 50 kms of a licensed caravan park. Government support for the move by the Advisory body to remove this Regulation is absolutely essential

Caravan Park owners in the majority pay token lip service to their VIC organisations, and have relied for many years on the consumer having no choice, either physically due to their vehicle construction, or through Regulation under the Caravan Parks & Camping Grounds Act 1995 and subsequent amendments; providing them with an enforceable monopoly and therefore little need to be involved with the VIC or area promotion.

The Shires and their Visitor Centres need to carefully examine the repeatability factor, and look past the static 'one off' visit displays. Dynamic

attractions such as tours, train excursions and such can sustain repeat visits; however desirable accommodation is at the heart of repeatability.

Due to the overall lack of tourism related professional guidance, alternative accommodations relative to the mobile traveller, especially the self-contained traveller, rural tourism issues receive close to lip service only.

The preceding factors, coupled with isolation, long distances between centres and lack of facilities, mean the Shires or local passionate volunteers have to overcome considerable disadvantages to compete equally with the western coastal routes.

It is essential that mobile travellers be attracted to well signed Visitor Information Centres (VIC) with reasonable and accessible parking, to gain the full breadth of the localities attractions and attributes.

WA's \$700m share of RV visitor spending is at risk because it is "all too hard on the coast and far too far between stops", together with less & less rest sites for self drive RV visitors, WA overall is losing its appeal.

Shires with policies of NO this and NO that, who employ Rangers to harass RVers who just want to stop somewhere for the night, often fatigued beyond measure, is placing a chunk of our WA ECONOMY AT RISK and must stop.

Without satisfied visitors upon whom the caravan parks rely to stay viable, every part of the WA economic community will suffer, not just tourism.

Addressing the woes of the caravan parks in isolation is not an answer to sustaining a viable mobile self-drive tourist or family holiday accommodation industry.

The Caravan Park Industry must change their economic model, engage with changing consumer needs and not rely on 'bail out' or regulation because they feel hard done by economically. They need to visit the local deli overshadowed by Coles or Woolworths to understand 'squeeze' or like for like competition. Commercial risk is an ongoing fact of life.

There is a little country Caravan Park that every time you pass it, the bays are generally full. Goomalling Caravan Park has sensible rates and attracts repeat visitations over and over. They are not on a major Highway or recognised tourist route, but they are always near 100% occupied

Restrictive accommodations, especially in those townships that employ aggressive, unfriendly attitudes and punitive threats, are very quickly identified, often by the simple expedient of word of mouth, and are then strictly avoided. The mobile phone or email network has the word out instantaneously.

If there is no reasonable accommodation within near walking distance from a business centre, then the tourist will generally be forced by circumstances to simply drive straight through. Or turn around and go back home as is often the case in the North West between Broome and Kununurra

There is a distinct impression of putting the cart before the horse with this Inquiry. The travellers' needs and wants are not being met, so technology is moving to do this through the design of modern vehicles, reducing more and more the need to visit caravan parks.

If Park owners look to restructuring their services to meet these needs instead of telling the tourist what is good for them, then Inquiries such as this can address part of the economics in the form of taxes and charges and provide appropriate relief.

Caravan Parks are sitting back asking/requiring Government to maintain their accommodation market monopoly; while in the background they gradually squeeze out the mobile traveller by installing chalets.

Caravan Park owners are using these chalets as a form of permanent public housing; meanwhile the RV market will continue evolving using technology and alternative accommodation solutions to those dwindling sites offered by Caravan Parks.

Continued Government regulation, or the application of even harsher regulations will only serve to diminish mobile tourism in WA to the point of a reduction down to at least 50% of current levels, in a short space of time.

Tasmania and Queensland at this time are leading the way.

Tasmania in particular is leading the way for the mobile tourist (RV) trade with innovation, and the provision of roadside services that meet modern needs.

Queensland has in recent years done an about face on restrictive practices affecting the mobile self drive tourist. They are investing Government funds (\$300,000) in providing minor infrastructure, and ensuring that Queensland RV tourism continues to have a major impact on the Queensland economy.

The removal of Life Style Villages from the Caravan Parks and Camping Grounds Act 1995, and placing it where the various levels of expertise can address the multiplicity of issues prevailing in this section of the Industry is paramount.

CMCA and its' Members are not anti caravan parks; they are opposed to enforced monopolies and a range of underhand tactics employed to prevent off road camping.

Adequate funding by Main Roads WA for more appropriate 24hr rest areas can only benefit WA tourism. There are currently 19 rest areas throughout the whole of WA, 13 north of Carnarvon and 6 gazetted east of Norseman.

The new Lord Forrest Highway for example, has no rest stops of any type along its entire length and is therefore tourist un-friendly.

WA could be a mecca for mobile tourism. It could be known locally and internationally as the RV Friendly State. Caravan Parks would get a share of an increasing market as could Regional WA tourism. The % occupancy can be addressed in this way.

On coast tourism is getting far too hard for RVs to access, establishing new market areas and raising the profile of small rural towns and villages will be far more productive than trying to establish replacement Caravan Parks with Crown or other land.

In the meantime, self-drive tourists have little option but to find suitable rest areas in a range of locations off the coast.

Rural WA is the natural substitute provider to the market, however they require a considerable amount of tourism advice, training and professional support to sustain such a tourism based market

CMCA acknowledge that there are taxation issues unrelated to the current market availability of caravan park sites in WA. Our competency is not in this field, but one of consumer related needs, and this submission has for the first time in years attempted to put a wider face to the consumer need of industry, without whom there is virtually no industry.

The Campervan & Motorhome Club of Australia Ltd
National Member Benefit Team

27th April 2009