

Beckingham, Vanessa

From: Beckingham, Vanessa
Sent: Friday, 1 May 2009 5:17 PM
To: Committee, Economics & Industry Standing
Subject: FW: Shire of Denmark submission regarding caravan parks
Attachments: caravan Denmark.pdf; CCI Terms of Ref Advertising Copy.pdf

Vanessa Beckingham
Research Officer
Economics and Industry Standing Committee
Legislative Assembly Committee Office
Parliament House
Perth WA 6000
AUSTRALIA

Ph: (61 8) 9222 7486
Fax: (61 8) 9222 7804

www.parliament.wa.gov.au

From: Abernethie, Loraine
Sent: Friday, 1 May 2009 5:05 PM
To: Beckingham, Vanessa
Subject: FW: Shire of Denmark submission regarding caravan parks

Hi Vanessa

Here's another one - could you please respond to this from the laeisc address.
thanks
Loraine

From: Gregg Harwood [health1@denmark.wa.gov.au]
Sent: Friday, 1 May 2009 3:49 PM
To: Abernethie, Loraine
Subject: Shire of Denmark submission regarding caravan parks

I have attached a PDF of the Shire of Denmark's submission. A hard copy is in the mail.

Gregg Harwood Principal Environmental Health Officer
Shire of Denmark
South Coast Highway, Denmark
P.O. Box 183 Denmark 6333

Direct Line 08 98 480319
Fax 08 98 481985
health1@denmark.wa.gov.au

1/05/2009



South Coast Highway, Denmark Western Australia 6333

Tel (08) 9848 0300 Fax (08) 9848 1985

Our Ref: HEALTH1, GOV20, GH/GH
Enquiries: Gregg Harwood

29th April 2009

Attn: Dr Loraine Abernethie

The Principal Research Officer
Economics and Industry Standing Committee
Legislative Assembly
Parliament House
Perth WA 6333

Dear Dr Abernethie

Inquiry into the Provision, Use and Regulation of Caravan (and Camping Grounds) in Western Australia

At its meeting on the 28 April 2009 Council resolved the following regarding the Economics and Industry Standing Committee's inquiry into the provision, use and regulation of caravan (and camping grounds) in Western Australia:

"That Council advise Western Australian Legislative Assembly Economics & Industry Standing Committee that:

- 1) Its opinion is that the current decline in number of tourist caravan parks and camping grounds can be attributed to the:
 - a) The encroachment of residential development fronts into what were traditionally fringe tourist areas such as Rockingham, Safety Bay, Cockburn Sound and the coastal strips of many regional towns.
 - b) The increasing value of residential building blocks means that many coastal caravan parks and camping grounds that are in or close to residential areas are now worth more as housing lots than as a going business concern.
 - c) The conversion of tourist caravan parks and camping grounds to motel and chalet developments which have higher off season occupancy rates but are beyond the reach of lower income families and do not appeal to the caravanning public

All communications to:

Chief Executive Officer, PO Box 183, Denmark WA 6333

Email: admin@denmark.wa.gov.au

www.denmark.wa.gov.au

- d) The conversion of tourist parks to permanent park home parks which has been driven by both a genuine the desire to obtain a regular income and the short term opportunity to obtain significant profits through the commissions from selling tenants park homes and then charging them a substantial once off fee to shift their park home onto the park.
- e) The Caravan Parks and Camping Grounds Act 1995 and the Caravan Parks and Camping Grounds Regulations 1997 do not make specific reference to either the Planning and Development Act 2005 or the Town Planning Regulations 1967 or any of the policies that have been made under them (eg: WAPC Planning Bulletin 49) in regard to caravan parks and camping grounds. This omission means that there is scope for opportunistic developers to claim that anything permitted in the regulations is permissible in any caravan park. An example of how developers have attempted to misuse these regulations in the past is claiming that they override planning legislation and give them the right to put long stay park homes on formerly tourist sites despite this being a substantive material change in the land use that requires either planning scheme consent or a rezoning of the land.
- f) Parks becoming run down and financially unviable and finally closing due to their in ability to meet the costs of major maintenance and upgrading to meet RAC star rating levels and current industry amenity standards.
- g) The RAC star rating system, which tourists use to assess caravan parks when making bookings penalises older well run, clean parks because they do not have all of the modern facilities. This rating penalty reduces the number of new clients that are attracted to the park, which in time reduces the park's cash flow which eventually leads the park's decline making it a prime target for conversion to a park home park or redevelopment.
- h) Difficulties in obtaining approvals and finding suitably priced freehold or crown leasehold land for developing new parks.
- i) The high costs and head works fees associated with developing new parks
- j) It is uneconomic to build and staff tourist caravan parks to cater for a peak tourist season of only 9 days a year when the parks are full.

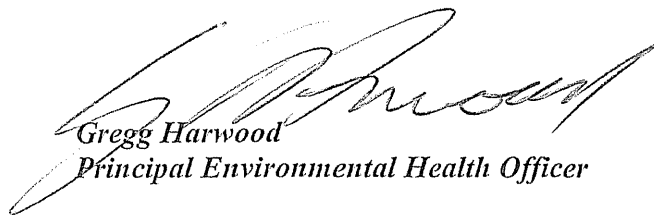
- k) There are no grant incentives for local governments to establish overflow camping facilities.
- 2) Its opinion is that the current decline in the number of tourist caravan parks and camping grounds could be reversed if the following initiatives were implemented:
- a) Tighter planning controls and state wide or regional planning policies to ensure that tourist caravan parks and camping grounds are correctly zoned as tourist caravan parks and camping grounds so that they can't be converted to permanent park home developments or more intensive, higher cost tourist developments without a specific planning scheme consent or scheme amendment proposal.
 - b) State wide and regional research as to what percentage of permanent park home accommodation is required in a tourist park to provide sufficient cash flow to retain a manager and core staff during the off season.
 - c) Amending the Caravan Parks and Camping Grounds Act 1995 and the Caravan Parks and Camping Grounds Regulations 1997 to show that they are clearly subordinate to the Planning and Development Act 2005, the Town Planning Regulations 1967 and any of the policies that have been made under them (eg: WAPC Planning Bulletin 49) in regard to caravan parks and camping grounds.
 - d) The adoption of local authority and regional tourist strategies which identify and address the current and future need for affordable caravan park and camping ground accommodation in a given area. These strategies should also require developers wish to rezone a caravan park to another use to prove that their proposal will not cause a future shortage caravan park and camping ground accommodation.
 - e) The creation of a land bank of suitable crown leasehold land that has already undergone provisional planning and environmental assessment and is available specifically for the purpose of developing affordable caravan parks and camping grounds.
 - f) The provision of head works incentives (power, water, roads and drainage) for the development or substantial redevelopment of affordable caravan parks and camping grounds.

- g) The provision of grant incentives to local governments for the establishment of overflow camping facilities.”

As a Council decision this resolution is the Shire of Denmark's formal response to Economics and Industry Standing Committee's inquiry into the provision, use and regulation of caravan (and camping grounds) in Western Australia.

Should you wish to discuss this matter please contact the undersigned on telephone (08) 9848 0300 or email peho@denmark.wa.gov.au

Yours faithfully



Gregg Harwood
Principal Environmental Health Officer