

**Submission
No 101**

INQUIRY INTO CROWN LAND IN NEW SOUTH WALES

Organisation: Caravan and Camping Industry Association NSW

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Chair of the Committee, the Hon. Paul Green MLC.
Legislative Council General Purpose Standing Committee No. 6
Parliament of New South Wales
6 Macquarie Street
Sydney NSW 2000

Dear Mr Green

**Submission to Legislative Council General Purpose Standing Committee No. 6 -
Inquiry into Crown Land**

The Caravan, Camping & Touring Industry & Manufactured Housing Industry Association of NSW (including Caravan & Camping Industry Association, Manufactured Housing Industry Association and Land Lease Living Industry Association) is this State's peak industry body representing the interests of caravan and holiday parks, manufacturers and retailers of recreational vehicles (RVs) (motorhomes, campervans, caravans, camper trailers, tent trailers, 5th wheelers and slide-ons) and camping equipment, residential land lease communities and manufacturers of relocatable and manufactured homes.

We currently have over 700 member businesses representing all aspects of our industry. More than 400 are operators of holiday parks and residential land lease communities (residential parks, including caravan parks and manufactured home estates) in New South Wales (NSW) and over 200 are manufacturers, retailers and repairers of RVs and accessories.

Of our park members, 130 are located on Crown land. As an important stakeholder in the Legislative Council General Purpose Standing Committee No. 6's *Inquiry into Crown Land* we welcome this opportunity to provide our submission.

Benefits of Active Use and Management of Crown Land - Crown Land Caravan Parks

Crown land comprises almost half of all land in NSW¹ and supports a whole range of public amenities and uses including schools, hospitals, sporting grounds, as well as caravan and camping parks. The social, environmental and economic benefits of Crown land caravan parks cannot be overstated.

¹ http://www.crownland.nsw.gov.au/crown_land/about_crown_land

There are approximately 270 caravan parks and/or camping grounds on Crown land in NSW. These parks provide the NSW community, particularly families and retirees, with safe and affordable holiday and recreational experiences in beautiful locations throughout the State, and are very important to the tourism economy as a whole.

The caravan and camping industry continues to be one of the fastest growing domestic tourism sectors in Australia. New South Wales is Australia's favourite State for caravanning and camping, with a 35.3% share of visitor nights and a 33% share of visitors. Caravanning and camping also accommodates over 25% of the visitor holiday nights in Regional New South Wales making it a vitally important part of the tourism infrastructure.

In 2015 New South Wales received over 3.6 million domestic caravan and camping visitors spending over 14.2 million nights in caravan and camping accommodation. This injected \$2.76 billion in economic value to New South Wales.²

And there is still room to grow. Every night there are around 50,000 short term and camp sites available across our member park network. The national occupancy rate is 54%, and 73% of our parks and camping grounds offer facilities to accommodate the growing number of RV tourists with larger units.

Of the overall number of caravan and camping visitors to NSW, 80% are engaged in holiday and leisure activities that bring significant benefits for the broader tourism economy of regions. Caravan and camping visitors spend an average of 4.5 nights which is 1.3 nights longer than the average for visitors to the state.³

Caravan and camping is therefore a key sector to assist in the Government's action plan to double overnight expenditure in New South Wales by 2020.

In offering a number of accommodation options in pristine locations, from budget camp sites to luxury cabins and safari tents, caravan and holiday parks in NSW are providing high quality facilities and showcasing the natural environment – two important benefits of the active use and management of Crown land.

Crown land caravan parks are also a sustainable use of land and natural resources. Firstly, caravan and camping can be a great eco-friendly holiday option. Whether a traveller is in a tent or an RV, their living space is compact and they usually use battery or solar powered lights, gas for cooking and conserve their water supply. Even free standing cabins in parks are low impact – they are primarily single story and have a light footprint.

Secondly, the appeal (and success) of the caravan park industry is reliant on visitors experiencing and enjoying the natural environment. A number of Crown land caravan parks are committed to environmental and socially responsible management. Of our 120 park

² *National Visitor Survey*, YE Dec 15, Tourism Research Australia

³ Tourism Research Australia, op. cit.

members situated on Crown land, 89 have obtained a Gumnut Award - an environmental rating program for holiday parks, caravan and RV dealers and manufacturers and suppliers to the industry.

Developed by our Association and independently assessed by the University of Western Sydney, the Gumnut program recognises caravan and camping businesses who have demonstrated a commitment to environmental sustainability and socially responsible management. The Gumnut Awards have assisted parks to identify opportunities for improvement in the following sustainability categories:

- Landscaping
- Water and waste water
- Solid waste
- Energy efficiency
- Air and noise pollution
- Biodiversity conservation
- Economics
- Staff
- Local community, and
- Safety and emergency response planning.

Finally, Crown land caravan parks provide income to committees of management, which fund improvements to the parks and adjoining reserves. A specific requirement of the *Crown Lands Act 1989* is that the proceeds of commercial activities on reserved Crown land are to be spent on the management of reserved Crown land. In this way, commercial activity meets the needs of public users of a reserve and the revenue generated from a commercial undertaking, such as a Crown land caravan park, assists in the on-going management and sustainability of Crown land assets.

Since Crown land must be managed actively to maintain public enjoyment and access, we submit that Crown land caravan parks are a valuable contributor to this important objective.

Community Consultation

The Committee has been tasked to examine the adequacy of community input and consultation regarding the commercial use and disposal of Crown land.

In relation to our industry, we note that local councils manage a significant proportion of Crown reserves on which caravan parks are situated. Policies for community consultation are clearly stated in the Crown Land Handbook for trusts managing Crown land reserves and commons, and trustees of schools of arts.

However, in its *Response to Crown Lands Legislation White Paper*, the Government agrees that community consultation must be meaningful, and proposes to develop a community engagement strategy for dealings with Crown land as part of the response to the Review. The

strategy will also recognise the need for a mix of traditional communication methods, such as newspapers, and contemporary methods, such as social media.

While we do not support the Crown land reform proposal that the responsibility for caravan parks on Crown land be devolved to local councils, we do note that as a result of provisions in local government legislation, communities will be in a position to influence decisions about how Crown land is managed through the processes under the *Local Government Act 1993*. Local Councils will be able to establish community advisory groups to ensure continuing community involvement in the management of land.

Nevertheless, it is our firm view, which has been previously expressed, that for the effective management of Crown land caravan parks there must be within the Department of Industry – Crown Lands a specialist unit administering a centralised management regime.

Our position is that caravan parks are a state significant assets. Centralised management of Crown land caravan parks would serve to ensure that the state-wide system of regulation of caravan parks that was introduced in 1986 is recognised. Ordinance 71 under the then *Local Government Act 1919* and continued in the *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005* under the *Local Government Act 1993* saw the introduction of a centralised state-wide regulatory program.

We submit that a centralised system has a better chance of supporting a management approach that better serves the people of NSW, as well as the caravan and camping industry, while still being sensitive to the environmental, social and cultural heritage considerations in Crown land decision-making.

Protecting Crown Land

The Committee has also been tasked to examine the most appropriate and effective measures for protecting Crown land so that it is preserved and enhanced for future generations.

Some stakeholders have expressed concerns that the proposed new legislation will wipe out the current management principles, which include environmental protection, conservation and the encouragement of public use, enjoyment, and multiple use of Crown land,⁴ and make it easier to sell off Crown Land to private interests, eroding a public asset and limiting public enjoyment.

We submit that caravan parks are ecologically sustainable development and whether they are situated on Crown land or freehold property, they will continue to be a positive use of land for the benefit of the NSW public. As stated above, the appeal of the caravan park industry is reliant on visitors experiencing and enjoying the natural environment and operators are commitment to environmental sustainability and socially responsible management.

⁴ Section 11, *Crown Lands Act 1989*

Caravan parks are of vital importance in NSW's tourism accommodation mix and in many regional areas they are community hubs, supporting other local businesses and social engagement. Parks employ local people, pay local rates and buy goods and services locally. Research shows that for every \$1 income in a commercial caravan park, \$1.38 of economic benefit flows on to the local community,⁵ making caravan parks an important part of the tourism infrastructure which delivers strong economic prosperity in regional NSW.

Caravan parks in NSW are also highly regulated to ensure the preservation of the environment, responsible development and operations and protect the health and safety of visitors. The *Environmental Planning and Assessment Act 1979* provides the statutory basis for the development consent process in NSW. Section 68 of the *Local Government Act 1993* requires the owner or manager of a caravan park to seek an approval from Council to operate a caravan park. *State Environmental Planning Policy 21* requires development consent for new caravan park and camping proposals regardless of local instruments.⁶

The standards for caravan parks are set out in the *Local Government (Manufactured Homes, Caravan Park and Moveable Dwellings) Regulation 2005* and address planning standards including site type and size, setbacks, buffer zones, separation distances, roads, utilities, facilities, etc. Councils can also impose conditions on the operation and structure of a caravan park. Where a caravan park is located on Crown land it is also subject to the Plan of Management applying to the land and the *Crown Lands Act 1989*.

We believe appropriate and effective measures for protecting Crown land, so that it is preserved and enhanced for future generations, can be incorporated into a state-wide, centralised management structure that balances environmental, social, cultural heritage and economic considerations through supporting the preservation and development of caravan parks and camping grounds.

CONCLUSION

Caravan parks on Crown land are a significant contributor to NSW tourism and regional economies. In representing the interests of our members on Crown lands we are keen to continue to participate in any further consultations and ask that we be noted as a stakeholder so that we continue to be included in all future communications, hearings and meetings.

Thank you for your consideration of the issues we have raised.

If the Committee would like to learn more about our Association information about us and all our members is available on our website www.caravan-camping.com.au.

⁵ p 28, BDO, *Caravan, RV & Accommodation Industry of Australian Economic Benefit Report – Commercial Caravan Holiday Park to a Local Community*, October 2012.

⁶ In fact, the restrictions prescribed by SEPP 21 have meant that virtually no new caravan parks have opened since the planning instrument was enacted.



Should you wish to meet and/or discuss any aspect of this submission please contact me on (02) 9615 9900 or email lyndel.gray@cciansw.com.au.

Yours sincerely

Lyndel Gray
Chief Executive Officer