



## Disclaimer

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## EXECUTIVE SUMMARY

### 1.0 STATEMENT OF INTENT

The primary purpose of the “Sustainability Report for Caravan Parks and Associated Trades – Western Australia 2009” is to ensure all relevant Local and State Government agencies have a clearer understanding of this unique tourism and affordable housing industry. The implementation of the recommendations contained within this Report will promote improved sustainability within all caravan parks and associated trades.

### 2.0 CARAVAN INDUSTRY ASSOCIATION WESTERN AUSTRALIA (INC)

The Caravan Industry Association Western Australia Inc (CIAWA) is the peak industry body for the Caravan and Camping sector. It represents 140 caravan park members and 74 trade members throughout the State, and operates under the influence of a number of Government departments which have their own specific and different legislation.

### 3.0 CONTEXT AND TRENDS

The Caravan Industry Association WA (Inc) considers caravan parks and associated trades have had and will continue to have a crucial role in the tourism and affordable housing infrastructure of WA. At a time when other industries and the high end tourism sector are seen to be winding down/retrenching/dismissing staff consumer confidence and interest in the product range and holiday options are at record levels.

Aside from the peak season of Christmas and Easter holiday periods, as well as July and August in the North West, the availability of sites remains high throughout the year. The industry shows a significant capacity exists within caravan parks to accommodate the existing and anticipated demand.

A negative trend being experienced is a rise in operating costs which could not be sustained and are resulting in park closures. Park closures, increases in demand for long stay tenancies and demand for a wider choice in tourism accommodation are all considered a direct response to the combined effect of increases in land values; rises in taxation (land tax and local authority rates); increased water and power rates; the existence of non “caravan park” zoning under Local Town Planning Schemes; and the global economic downturn.



### 4.0 STATUTORY FRAMEWORK FOR TOURISM

The principal legislation which governs the industry are the Caravan and Camping Grounds Act 1995 and Caravan and Camping Grounds Regulations 1997. Recent over regulation of the industry is economically and socially undesirable, and directly impacts tourism, construction, manufacturing, and retail.

Local Authorities and the Western Australian Planning Commission (WAPC) have the opportunity to assist the CIAWA to ensure a sustainable and viable caravan industry remains. Recognition of the importance of a diverse supply of holiday accommodation and that long stay residents have a considerable role to play in the viability of a caravan park is required.

A more sustainable framework which could guide future Policy includes:

- ◆ The need for a site by site analysis of the type of caravan parks developed within the relevant region – to be undertaken at the Local Tourism Strategy stage;
- ◆ No restriction on accommodation type;
- ◆ Retain current zonings for all existing caravan parks;
- ◆ The need for all newly developed caravan parks to be zoned ‘caravan park’;
- ◆ Acknowledgment that long stay residents have an important role to play in the economic and social wellbeing of a local community;
- ◆ Provisions that provide for additional long stay residents within a caravan park, which where possible do not result in a net reduction in the number of existing tourism sites/units;
- ◆ Provisions to suggest the need for additional park homes or long stay residents to be located within areas of a caravan park which is presently vacant or occupied by unpowered sites;
- ◆ Design criteria suggesting that park homes and long stay residents, where possible, should not be located within the park to the detriment of tourist sites and facilities and should be separated from the tourist component of the park;
- ◆ Recommendations seeking the need for a definable improvement to tourism facilities within the park should additional long stay residents be approved.

### 5.0 DEFINITIONS

The need for a uniform set of definitions throughout Western Australia’s town planning framework is a must to ensure a consistent approach to all caravan park proposals is achieved. The list recommended for adoption within Section 5.0 of this report are those most commonly misused or misunderstood and should be adopted by all levels of government for inclusion into pending policies and schemes.



## 6.0 SUSTAINABILITY ISSUES AND NEEDS

In order for the Caravan and Camping Industry to remain sustainable, each caravan park needs to be viable and be able to provide a wide choice in affordable accommodation to both holiday makers and long stay residents.

Current town planning framework and other Government regulations are considered to be reactionary and often over regulated. The negative result of over regulation of the industry is economically and socially undesirable, and directly impacts on tourism, construction, manufacturing, and retail which all provide significant economic benefit for a wide range of Australian suppliers to the industry.

The over regulation of the industry directly impacts on bulk licensing scheme for caravan dealers; inconsistent caravan/motorhome dealer opening hours; inability to process tenant bond disposal; inconsistent annual licenses under the Caravan and Camping Ground Act; negative impact on land values through Town Planning Scheme Zoning; the inability to respond to market demand for occupant and accommodation type; and negatively impacts on the industry to continue to be a core provider of affordable accommodation in Western Australia.

## 7.0 IMPLEMENTATION/RECOMMENDATIONS

The suggested recommendations contained within this Report are across all aspects of Government, thus re-enforcing the need for a more collaborative approach to the sustainability and management of the industry.

It is acknowledged that current resourcing and priorities will influence the consideration and effective implementation for some recommendations. Those of a financial or licencing nature will require consideration by the relevant authority(s) whilst those limited to development are most appropriately implemented via Local Authorities within Local Tourism Strategies and/or Town Planning Schemes, or the WAPC when next reviewing the relevant policies or schemes.

The principal recommendations of this Report are outlined below:

- 1 When next reviewed, state and/or local town planning policies be modified to provide greater acknowledgement on the importance the caravan and camping industry has in the provision of affordable tourism and long stay accommodation.
- 2 When next reviewed, state and/or local town planning policies be modified to give consideration to the 'definitions' provided by the CIAWA in this report.
- 3 When next reviewed, state and/or local town planning policies be modified to acknowledge the Caravan and Camping Ground Act 1995 and Caravan and Camping Ground Regulations 1997 as the principal town planning instrument to guide the design and management of all caravan parks.



- 4 When next reviewed, state and/or local town planning framework, give strong consideration to inclusion of more sustainable town planning provisions which may include but not be limited to:
  - ◆ The need for a site by site analysis of the type of caravan parks developed within the relevant region – to be undertaken at the Local Tourism Strategy stage;
  - ◆ No restriction on accommodation type;
  - ◆ Retain current zonings for all existing caravan parks;
  - ◆ The need for all newly developed caravan parks to be zoned 'caravan park';
  - ◆ Acknowledgment that long stay residents have an important role to play in the economic and social wellbeing of a local community;
  - ◆ Provisions that provide for additional long stay residents within a caravan park, which where possible do not result in a net reduction in the number of existing tourism sites/units;
  - ◆ Provisions to suggest the need for additional park homes or long stay residents to be located within areas of a caravan park which is presently vacant or occupied by unpowered sites;
  - ◆ Design criteria suggesting that park homes and long stay residents, where possible, should not be located within the park to the detriment of tourist sites and facilities and should be separated from the tourist component of the park;
  - ◆ Recommendations seeking the need for a definable improvement to tourism facilities within the park should additional long stay residents be approved.
- 5 Department of Planning and Infrastructure and Tourism Western Australia actively pursue the release of additional appropriate crown land for the purpose of "caravan park" development. Where Crown Land is offered as a leasehold, all lease terms to be not less than 50 years, with a 50 year option thereafter.
- 6 When next reviewed, the Department of Transport review current restrictions on the bulk licencing of caravans.
- 7 When next reviewed, the Department of Commerce review current restrictions on the opening hours for caravan and motorhome dealers.
- 8 When next reviewed, the Department of Local Government review current regulations and processes associated with the annual licencing of caravan parks under the Caravan and Camping Ground Regulations.
- 9 During the next budget review process, State Treasury review current prohibitive price structuring as they relate to the caravan and camping industry for:
  - ◆ State Land Tax;
  - ◆ Essential services (power and water); and
  - ◆ Stamp Duty on motorhomes.
- 10 When next reviewed, Planning Bulletin 71 be modified (or replaced) to allow Residential Caravan Parks within 'rural' zoned land where appropriate social facilities and services are available to support the provision of affordable housing for our aging demographic.

## 1.0 STATEMENT OF INTENT

The primary purpose of the “Sustainability Report for Caravan Parks and Associated Trades – Western Australia 2009” (this Report) is to ensure all relevant Local and State Government agencies have a clearer understanding of this unique tourism and affordable housing industry and its needs to remain sustainable.

It highlights the requirement to amend current and proposed legislative or statutory barriers and introduce a sound and uniform town planning framework against which State Planning Policies, Local Tourism Strategies and/or Town Planning Schemes are to be formulated.

The implementation of legislative changes and a consistent town planning framework within Western Australia will promote improved sustainability in the provision and protection of tourism and residential accommodation, choice and affordability within the Caravan and Camping Industry and wider community.

## 2.0 The Caravan Industry Association (Western Australia)

### 2.1 The Role of CIAWA (Inc)

This Report has been prepared by the Caravan Industry Association WA (Inc) (CIAWA) which is an active lobbyist in the need for ongoing reform within the legislative framework that guides this industry.

The CIAWA represents caravan parks; caravan, camper trailer and motorhome manufacturers and dealers; camping retailers; service providers to the caravan park and trade industry; and tourism operators. It represents 140 caravan park members and 74 trade members throughout the state. Australian Bureau of Statistic (ABS) figures suggest the amount of caravan parks to be only 197. (ABS, 2008). It must be noted that ABS figures exclude caravan parks with less than 40 licensed sites.

Figure 1 provides a snapshot of the overall industry, the various stakeholders, Government agencies, the established relationships between each key stakeholder and the regulations that influence them.

The CIAWA aims are to:

- ◆ Promote the caravan and camping lifestyle;
- ◆ Encourage all caravan park owners/managers to create a positive sense of place/ community within each park regardless of its type (Tourist, Mixed or Residential);
- ◆ Preserve holiday and residential affordability and choice for all holiday makers and long stay residents;
- ◆ Address long term sustainability issues that threaten the industry;
- ◆ Achieve recognition of the importance the industry plays in the tourism and residential infrastructure in Western Australia;
- ◆ Advocate on behalf of members at Government level; and
- ◆ Form links with key industry bodies.

## 2.2 Sustainability Ethics within the CIAWA

In recognition of the importance of a sustainable framework across all aspects of the industry, the CIAWA operates collectively under an adopted “Code of Ethics” which establishes the standards of conduct to be observed by all its members. Under the Code, all members agree to:

- ◆ Promote “Best – Practice” Standards throughout the industry, fostering sustainable economic, environmental and socially responsible management;
- ◆ Ensure legislative regulation and code of practice applying to the industry are complied with and promoted throughout;
- ◆ Promote a fair and safe working environment for all staff and contribute positively to the local community;
- ◆ Promote the caravanning and camping lifestyle for all people;
- ◆ To support any promotions or promotional activities that the CIAWA may conduct or be involved in;
- ◆ Accurately represent all offerings of goods and services;
- ◆ Act with integrity and respect on all occasions;
- ◆ Handle all complaints with professionalism and a view to resolution, reporting to the complainant the outcome of the investigation;
- ◆ Fulfill all warranties, guarantees and professional obligations promptly and faithfully;
- ◆ Not divulge confidential and personal information on any member of CIAWA without their express consent;
- ◆ Not speak disparagingly of the work or product of any other member; and
- ◆ Support the Association and its members by doing nothing that could be prejudicial to the standing or reputation of the Association or its members.

## 3.0 INDUSTRY CONTEXT AND TRENDS

### 3.1 Context

The Caravan Industry Association WA (Inc) considers caravan parks and associated trades have had and will continue to have a crucial role in the tourism and affordable housing infrastructure of WA. In smaller regional towns caravan parks are a recognised provider of affordable housing and holiday accommodation.

They are the catalyst for spending money locally. Visitors to caravan parks support local tourist operators and attractions, supermarkets, service stations and vehicle repairers, local markets and souvenirs. It is understood that international and domestic users of caravan parks spent almost \$6.5 billion in Australia in 2006 of which a similar expenditure has occurred during the past two years. In the latest ABS September 2008 figures, takings from the caravan parks alone were approximately \$38 million.

As these figures indicate, the use of caravan parks is a vital part of the State’s economy. In addition to the takings from caravan park operators, the Industry (Nationally) accounted for approximately \$1.16 billion from the 2008 manufacturing forecasts for caravans, camper trailers, park homes and motorhomes. While the manufacture of tents and other camping items are anticipated to account for a further \$62.5 million during 2008. (Caravan, RV & Accommodation Industry of Australia, 2008).

For the year 2007, around 871,590 visitors (or 14.3% of total visitors) stayed within a caravan park or camping ground during their holiday in WA. The majority of domestic visitors come from WA and only 11.1% from interstate. International visitors to WA who stayed within a caravan park or camping ground during their visit numbered 59,013 (or approximately 9% of all visitors) (Tourism Western Australia Annual Report 2007 – 2008).

The Caravan and Camping Industry is a considerable employer of local persons. The September quarter of 2008 identified 1,411 persons were employed by caravan parks which is up from 1,249 (1.12%) during the same period in 2005 (ABS, 2008). This growth in employment is considered to be far more significant than the numbers identified when combined with the reduction in park numbers from 205 in 2005 to 196 in 2008.

The 2006 Census indicated that approximately 14,504 persons (or 0.8% of total persons) usually residing in Western Australia were in ‘other’ dwellings such as caravans, cabins, tents, houseboats or flats attached to a shop. 65% of these persons are within the north-west and understood to be “grey nomads”. This figure had risen to 1.0% by December 2008, of which is considered to be from an increase in the number of “grey nomads” but also from the provision of worker accommodation (ABS, 2008).



The caravan industry is uniquely placed to create new facilities that can be offered to tourists and long stay residents at affordable rates. It is also better able than most other forms of tourism development to operate on leasehold tenure. However, this can only be achieved if Government can identify and promote development opportunities on appropriate Crown land.

Purchase and/or lease terms of Government land need to acknowledge the price sensitivity associated with the highly seasonal nature of demand for tourism accommodation in caravan parks and similar developments.

### 3.2 Trends

It is commonly recognised that the Industry is undergoing considerable change. At a time when other industries and the high end tourism sector are seen to be winding down/retrenching/dismissing staff and cancelling conferences, public shows and displays of product, CIAWA has expanded its presence. Consumer confidence and interest in the product range and holiday options are at record levels.

Many levels of Government and sectors of the community have the opinion that demand for sites outstrip supply. This assumption may hold true for only a few weeks a year during the peak Christmas and Easter holiday season, as well as July and August in the North West whereby most if not all caravan parks achieve 100% occupancy. Aside from this period the availability of sites remains high throughout the year. Generally, an overall yearly occupancy rate of 37% shows a significant capacity exists within caravan parks to accommodate the existing and anticipated demand.

The most practical solution to peak demand for tourist accommodation which already works well in some locations is the use of overflow areas in conjunction with Local Government or private operators. Overflow areas can be ovals, public caravan parks, vacant areas of land or unused land in existing caravan parks. When all caravan parks in the town or location are full, these overflow areas can be used with local authority approval to accommodate additional tourists during peak demand periods. It can be operated by the local authority or caravan park operator but must achieve open communication and co-operation between all parties.

A further trend which remains unquantified is the amount of caravan parks which are being expanded or refurbished. Anecdotal evidence supports that many regional caravan parks are undergoing such a trend, resulting in an improved supply of cabins and powered sites.

Examining the cause and nature of the causes behind these trends is an important step in determining the sustainability requirements needed to arrest the negative trends and reinforce the positive aspects of the industry to ensure viability and affordability is maintained.



On the negative, some park owners have experienced a rise in operating costs which could not be sustained, resulting in park closures. Within Western Australia alone, 24 caravan parks have closed since 1998 (see Table 3). It is understood that a further 3 caravan parks will close in WA this year (2009).

Some Local Authorities, Tourism Western Australia (TWA) and the Western Australian Planning Commission (WAPC) have concern over the increase in residential accommodation (long stay residents) and number of park homes within caravan parks, at the expense of 'tourist accommodation'. While the number of long stay residents within some caravan parks has increased, many have developed vacant land rather than redeveloped tourist sites. In addition, the number of caravan parks dedicated entirely to long stay residents (residential caravan parks – commonly referred to as park home caravan parks) has risen. Approximately 7 residential caravan parks have been developed in WA since 2005. A clear distinction should be made between powered caravan sites redeveloped for park homes which are still a tourism use versus for park homes which are for a residential use.

On the positive, occupancy rates for holiday makers have increased to 37% annually and 57.1% in the September 2008 quarter (ABS, 2008), reinforcing the major role caravan parks have within the tourism infrastructure of WA.

A rise in the number of persons seeking long stay agreements and an increase in holiday makers highlights the need for the industry to achieve a balance between affordable tourism accommodation and long stay housing affordability and choice. Requiring a balance within the type of tourist accommodation available is needed, given the trend towards cabin or chalet accommodation at the expense of powered caravan sites. The industry feels strongly, that this trend will be, and needs to be governed by consumer demand for cabin/chalet versus powered and unpowered site accommodation as opposed to policy intervention by Government.

Anecdotal evidence suggests a shift in the expectations of holiday makers and long stay residents. Generally holiday makers are seeking a wider choice in accommodation type (park home, cabins, RV sites) and a higher standard of private and communal amenities (ensuites, camp kitchens, recreational activities). While, long stay residents are 'demanding' privacy and separation from holiday makers. These expectations significantly increase the cost of maintaining a caravan park.

Table 1 has been prepared by CIAWA using data from Tourism Western Australia to depict the long term trends in the demand for caravan park accommodation by domestic and international holiday makers within the five tourism regions of Western Australia.

Table 2 has been prepared by CIAWA using data collected from individual caravan parks within Western Australia to depict the short term demand trends experienced by caravan parks and likely reasoning provided by the operators.



### 3.3 Contributors towards current trends

Rising operating costs, park closures, increases in demand for long stay tenancies and demand for a wider choice in tourism accommodation are all considered a direct response to the combined effect of increases in land values, rises in taxation (land tax and local authority rates), water rates, power rates, and the existence of non “caravan park” zoning under Local Town Planning Schemes. The global economic slowdown is also considered to be a contributor to the rise in domestic holiday makers and demand for affordable housing and choice.

#### 3.3.1 Land Values

Since early 2000 land values and housing prices have significantly risen in WA (381% from 2000 – 2005 within the South West – JMW Real Estate Dunsborough). This has the direct effect of creating a shortage in affordable housing choice and availability for some members of the community. As a consequence there has been an increase in the number of persons choosing to reside within either mixed caravan parks or residential caravan parks. In 2005, approximately 9,726 persons (4,863 park homes) were long stay residents within caravan parks. In 2008 that number has risen to 10,448 persons (5,224 park homes), an increase of 7.4% (ABS, 2005 & 2008).

#### 3.3.2 Zoning and Taxation

Not all caravan parks within WA are located on a zoning that reflects the specific use of the land as a ‘caravan park’. Many caravan parks have historically or recently developed on land zoned with a generic zoning of “tourist” (terminology varies between local authorities), “residential” or “short stay residential”. These zones often allow for the development of hotels/motels and other tourist or even residential uses, resulting in the development of a caravan park no longer being considered “the highest and best use of the land” by the Valuer Generals’ Office (VGO).

Land tax is levied on the land value against the ‘highest development potential’ provided for by the zoning of the land. As a consequence of rising land values and when zoning provides for uses with a ‘higher’ development potential than a caravan park, the resulting land tax bill and council rates are often beyond the earning capacity of some caravan parks. A direct effect has seen the closure of some caravan parks as evidenced by Table 3.

Rising land values have not only attributed to a rise in land tax and council rates, it has seen a reduction in the ability to provide affordable housing and holidays.



A direct effect has seen the closure of some caravan parks (ABS - 7 in WA since 2005, CIAWA estimate 14 pre July 2005 and 10 since July 2005) and/or the redevelopment of caravan parks for residential or hotel/resort style accommodation. It is acknowledged that the majority of park closures occurred within 2005/2006, a trend which appears to have provided some relief by the 50% concession in Land Tax in 2005. A further reduction or complete exemption is considered necessary to ensure those remaining within the industry continue to remain, irrespective of the zoning of their land and to support the long term provision of affordable housing and holidays.

#### 3.3.3 Affordability and Choice – Housing/Tourism Accommodation

The caravan industry remains well positioned to continue providing affordable residential housing in caravan parks, as the construction costs for a residential caravan park remains significantly lower than those when constructing a conventional residential subdivision.

Notwithstanding the 50% concession on Land Tax in 2005, some caravan parks still opted to close while others sort to increase takings by improving the choice of tourism accommodation available to holiday makers. The development of park homes/cabin/chalets, which have a higher nightly return than powered sites, has risen from 3,122 to 3,505 in 2008, which represents an increase of 12.3%.

Anecdotal evidence suggests a shift in the expectations of holiday makers. Generally holiday makers are seeking a wider choice in accommodation type (cabins/chalets/villas) and a higher standard of private and communal amenities (en-suites, camp kitchens, recreational activities). While long-stay residents are ‘demanding’ privacy and separation from holiday makers, these expectations significantly increase the cost of maintaining a caravan park.

Some park operators, sought to increase the number of long stay residents to assist in paying the rising land tax, council rates, water rates and power bills. This outcome, as referred to above, is in response to persons seeking to make a housing choice based on financial reasoning, but also for the amenity/convenience of living in a close community, which is seen by many as having a desirable sense of place. These residents are generally retirees and choose to locate within the increasingly popular residential caravan parks (commonly known as a park home park or lifestyle village). Another type of long stay resident is more common in the north-west and regional WA, being the worker, who has moved to the area in response to employment or in search of work. With housing choice and affordability generally decreasing as you move away from Perth, the choice and lifestyle options offered by a residential or mixed park is needed.



### 3.3.4 Global Economic Conditions

The global economic slowdown has had two main effects (there are many more) on the operations of caravan parks. Firstly, a reduction in income within some sectors of the community has contributed to the rise in demand for affordable housing and choice, thereby increasing the amount of long stay residents within some caravan parks.

Secondly, there is an increase in domestic demand for affordable holidays. Holiday makers are also seeking a greater choice in tourism accommodation such as cabins/villas/chalets and improved amenities, eg en-suite sites, playgrounds, water caravan parks, camp kitchens. Accommodating these demands is often done so at a cost to the park owners, which is not proportionately recoverable through their expected nightly tariffs.



## 4.0 STATUTORY FRAMEWORK FOR TOURISM

The Caravan and Camping Grounds Act 1995 and Caravan and Camping Grounds Regulations 1997 established a framework for caravan parks and were the result of years of consultation between State Government Departments, including Town Planning, Local Government, Consumer Protection, and Commerce, as well as consumer groups and wider industry bodies. This framework is being frustrated by conflicting legislation from town planning and building legislation which has the potential to reduce the sustainability of the industry.

The expectations of caravan park users are at odds with the regulatory requirement of the various levels of government in regard to caravan park development. The town planning and management regulations for caravan parks have diminished the financial viability of caravan parks to the point where few new tourist caravan parks have been developed in recent years.

The negative result of over regulation of the industry is economically and socially undesirable, and directly impacts tourism, construction, manufacturing, and retail which provides significant economic benefit for a wide range of Australian suppliers to the industry.

The caravan industry supports a significant part of the Australian economy, especially in regional areas. In addition to its role in providing affordable holidays for tourists, it provides affordable housing (particularly for the increasing aged demographic), timely worker accommodation for major resource projects and employment for a high number of skilled and unskilled workers.

For the industry to function properly there needs to be recognition by Government at all level of its important role in society and a proactive effort to reduce “red tape” and over regulation.

A number of State Acts and Regulations influence the design and management of caravan parks and the retailing of tourism products. There is no one centralised authority to oversee their relationship and implementation. The creation of a centralised department that specifically deals with issues of relevance or compliance within the caravan and camping industry is considered appropriate to ensure that decisions are made not only for the benefit of the tourism operator/retailer but the industry and community as a whole.

At present the current regulatory structure is fragmented with a number of government departments, none of which have staff dedicated to or with knowledge specific to the requirements of the caravan and camping industry.

It is acknowledged that the creation of a dedicated department would be a medium to long term outcome. However, within the short term it is suggested that within each existing Government Department that is associated with specific facets of the industry, select staff are hired with or trained to achieve a working knowledge of the industry to ensure more consistent and informed decision making results.



## 4.1 Town Planning Framework

Since 2001 the WAPC has released three ‘Planning Bulletins’ which have had a direct impact on the caravan park industry. A review of each reveals an evolution in town planning framework which has contributed to the trends presently being experienced by the Industry.

### 4.1.1 Planning Bulletin 49 – Caravan parks

In February 2001, the WAPC released Planning Bulletin 49 – “Caravan Parks” (PB 49). Its intent was to ensure the development of both short and long stay caravan parks did not impact on the amenity of the area within which they were located.

It made no reference to a preferred mix of short versus long stay accommodation, but did identify criteria to locate those caravan parks that catered predominantly for tourists in tourism areas. While caravan parks catering predominantly for long stay residents should be in or adjoining urban areas.

PB 49 provided the opportunity for a Local Town Planning Scheme to classify a caravan park as a “permitted use” on land zoned “tourist” or “caravan park”. Further, a Town Planning Scheme could allow the “discretionary” development of a caravan park in a “rural” zone.

PB 49 also permitted the design of caravan parks to be in accordance with the ‘Caravan and Camping Ground Regulations 1997 (as amended)’.

### 4.1.2 Planning Bulletin 71 – Residential Leasehold Estates and Developments

As evidenced by section 3.2 above, a growth in the number of residential caravan parks (referred to as lifestyle villages within PB 71) raised concern within local authorities and the WAPC. Residential caravan parks were seen as de-facto residential subdivisions, not responsive to proper and orderly planning (especially in rural areas), and whereby ‘residents’ did not have security of tenure over ‘their’ sites.

In response, the WAPC released Planning Bulletin 71 – “Residential Leasehold Estates and Developments” in March 2005. The most significant implications for residential caravan parks was the removal of the discretionary ability for Local Authorities to permit residential caravan parks in a ‘rural’ zone and the need for these caravan parks to be “assessed in the same way as conventional residential development”.

Irrespective of the type of caravan park, all are defined as a “caravan park” under the Act. Compliance with the Caravan and Camping Ground Regulations 1997 must therefore be achieved, in respect to caravan park design and management.



The provisions of Planning Bulletin 71 are at odds with this requirement in regard to ‘residential caravan parks’, which is seriously impacting on the developers/owners ability to create a dense, sustainable environment within which housing choice and affordability can be created. In fact the CIAWA argue that a greater ‘sense of place’ (community) for residents, can be achieved via compliance with the Regulations and not contemporary residential standards.

It must be understood that to provide an affordable housing model, residential caravan parks can rarely afford to be developed on land zoned ‘residential’ as the initial cost of land is too high. Most new residential caravan parks have been built on urban fringe land often zoned ‘rural’ which the urban front will soon encompass and where the necessary facilities for residential living is within reasonable proximity. To restrict approval of residential caravan parks on rural land severely impacts the industry’s ability to provide affordable accommodation.

### 4.1.3 Planning Bulletin 83 – Planning for Tourism

From 2003 to 2006 the WAPC undertook an extensive review (Tourism Taskforce) of the tourism industry with a view to arresting the closure of tourist caravan parks and the growing use of tourist zoned land for residential purposes.

The outcome of this investigation is contained within Planning Bulletin 83 – “Planning for Tourism” released by the WAPC in July 2007. PB 83 provided a framework against which Local Authorities throughout Western Australia were to be guided on the preparation of Local Tourism Planning Strategies and Town Planning Scheme Reviews.

It is important to note that PB 83 has effect on all land zoned for tourism purposes and its recommendations are not limited specific to caravan parks.

PB 83 effectively removed the much needed flexibility for park owners to ‘self regulate’ the accommodation mix and percentage of long stay residents within a caravan park. No such restrictions are imposed on other tourism uses nor are included within PB 49 or 71.

In response to industry back-lash, in April 2009 the WAPC issued a clarification note which has the effect of allowing individual caravan park owners/operators to liaise with Local Authorities to negotiate the most appropriate and sustainable development mix for each caravan park as opposed to the predetermined approach offered by the WAPC in PB 83. This approach is supported by the CIAWA.



#### 4.1.4 Local Town Planning Schemes and Local Tourism Strategies

Local Town Planning Schemes within WA are not uniform as they relate to zoning and definitions for caravan parks.

Generally Town Planning Schemes which came into effect around the year 2000 introduced:

- ◆ A “tourist” zoning, which allows for all types of tourism uses from caravan park to resort;
- ◆ Introduced a definition of a ‘park home park’ as being solely (100%) for permanent residents. (overlooked that a “Caravan park” can be all park homes, whereby residents can be solely or predominantly holiday makers); and
- ◆ Precluded the opportunity for caravan parks to be considered within a ‘rural’ zone.

Town Planning Schemes and Tourism Strategies which have recently (2008/2009) been advertised for public comment (Shire of Augusta Margaret River and Shire of Manjimup), have reacted to the above mentioned trends (refer Section 3.0), and the recommendations of BP 83, and sought to:

- ◆ Remove the “tourist” zoning for caravan parks;
- ◆ Introduce a site specific zoning of “caravan park” or “camping ground”;
- ◆ Introduce ratios on the mix of long stay and short stay occupants;
- ◆ Introduce a ratio on the number of park homes, cabins etc within a caravan park.



#### 4.1.5 Future Local Town Planning Schemes and Local Tourism Strategies

Local Authorities and the WAPC have the opportunity to assist the CIAWA to ensure a sustainable and viable caravan industry remains. Recognition of the importance long stay residents have within all types of caravan parks and need for park owners/managers to retain the right to “self regulate” accommodation types for holiday makers and long stay residents, is required.

The recent initiatives of the WAPC via PB 71 and PB 83, and their implementation via Town Planning Schemes, by some Local Authorities are considered unsustainable. A more sustainable framework which could guide future Policy include:

- ◆ The need for a site by site analysis of the type of caravan parks developed within the relevant region – to be undertaken at the Local Tourism Strategy stage;
- ◆ No restriction on accommodation type;
- ◆ Retain current zonings for all existing caravan parks;
- ◆ The need for all newly developed caravan parks to be zoned ‘caravan park’;
- ◆ Acknowledgment that long stay residents have an important role to play in the economic and social wellbeing of a local community;
- ◆ Provisions that provide for additional long stay residents within a caravan park, which where possible do not result in a net reduction in the number of existing tourism sites/units;
- ◆ Provisions to suggest the need for additional park homes or long stay residents to be located within areas of a caravan park which is presently vacant or occupied by unpowered sites;
- ◆ Design criteria suggesting that park homes and long stay residents, where possible, should not be located within the park to the detriment of tourist sites and facilities and should be separated from the tourist component of the park;
- ◆ Recommendations seeking the need for a definable improvement to tourism facilities within the park should additional long stay residents be approved.



## 5.0 DEFINITIONS

The need for a uniform set of definitions throughout Western Australia's town planning framework is a must to ensure a consistent approach to all caravan park proposals is achieved. The following list contains the most commonly misused or misunderstood definitions and should be adopted by all levels of government for inclusion into pending policies and schemes.

Please note, all definitions detailed below do not conflict with the Caravan and Camping Ground Act 1995 (as amended) and/or Caravan and Camping Ground Regulations 1997 (as amended). However, where there is a discrepancy between these definitions and those contained within the Act or Regulations, the Act or Regulations should prevail.

CIAWA would like to recommend that the following definitions be adopted in relation to the Caravan and Camping Act and Regulations.

### 5.1 Proposed General Definitions

**Caravan Park:** an area of land on which caravans, or caravans and camps, are situated for habitation.

**Caravan:** a vehicle that is fitted or designed for habitation, and unless the contrary intentions appear, includes an annex.

**Park Home:** is a 'caravan', but exempt from a vehicle license as it cannot be towed on the road and is used primarily for residential purposes.

**Cabin:** is a 'caravan', but exempt from a vehicle license as it cannot be towed on the road and is primarily used for short stay accommodation.

**Camp:** means anything used as or capable of being used for habitation and includes a vehicle of a prescribed type or in prescribed circumstances.

**Site:** is an area within a caravan park or camp of which is to be used by one caravan or camp and licenced under the Caravan and Camping Ground Regulations 1997.

**Chalet:** is a fixed structure, requiring a building licence, which may or may not be self contained that occupies a site within a caravan park or camp.

**Short stay:** where a person is not permitted to stay more than a total of 3 months in any one twelve month period.

**Tourist Accommodation:** Includes all forms of short stay accommodation such as: caravan, park home, chalet or cabin, used by holiday makers within a caravan park.



### 5.2 Proposed Types of Caravan Parks

**Tourist Caravan Parks:** A caravan park which contains all or some forms of cabins/chalets/villas/park homes and/or sites and whereby nearly all occupants are holiday makers.

**Mixed Caravan Parks:** A caravan park which contains all or some forms of cabins/chalets/villas/park homes and/or sites and whereby half of the occupants are holiday makers.

**Residential Caravan Parks:** A caravan park which contains predominantly park homes and caravans and whereby nearly all occupants are long-stay residents.

**Transit Park:** An overflow area used only for the temporary accommodation of holiday makers and when all registered caravan parks within a Local Authority area are 100% occupied. The location and management of these areas is undertaken by Local Government, generally in co-operation with local caravan parks.

**Road Side Rest Areas:** Given a change in the attitude of some travellers and the rising cost to travel there is an increase in the number of persons using Main Roads roadside rest areas ([www.mainroads.wa.gov.au](http://www.mainroads.wa.gov.au)).

### 5.3 Occupants

Following the introduction of the Residential Parks (Long Stay Tenants) Act 2006 (as amended), the need to 'update' definitions in respect to the nature of occupants has become a necessity. The following accurately describe all occupants within a caravan park and should be adopted into all Town Planning Schemes and Tourism Strategies.

**Long stay residents:** are people who occupy a site, as their principal place of residence, within a caravan park for more than 3 months in a 12 month period. This definition replaces the term – Permanent Resident.

**Holiday makers:** are those persons who usually have a principal place of residence elsewhere, stay for no more than 3 months total in a 12 month period and the main purpose for their stay is holiday pursuits. This definition replaces the term – Short Stay Tenant.

**Annuals:** are 'holiday-makers' whose caravan (including park home) occupies a site within a caravan park for an extended period, and is used periodically for holiday purposes (not more than 3 months within any 12 month period). This definition replaces the term – Semi Permanent.

## 6.0 SUSTAINABILITY ISSUES AND NEEDS

In order for the Caravan and Camping Industry to remain sustainable, each caravan park needs to be viable and be able to provide a wide choice in affordable accommodation to both holiday makers and long stay residents.

Current town planning framework and other Government regulations are considered to be reactionary and often over regulated. The negative result of over regulation of the industry is economically and socially undesirable, and directly impacts on tourism, construction, manufacturing, and retail which all provide significant economic benefit for a wide range of Australian suppliers to the industry.

For the industry to function properly there needs to be recognition by Government at all level of its important role in society and a proactive effort to reduce “red tape” and unnecessary compliance with irrelevant regulation.

In response, the following issues/solutions are offered:

### 6.1 Bulk Licensing Scheme for Caravan Dealers

Currently caravan dealers must have a minimum of 50 of an identical type, brand, model and tare weight of caravan/camper trailer to be able to apply for a bulk license for a caravan or camper trailer.

There are often minor cosmetic variations to each type of caravan/camper trailer which do not affect the tare weight or length of the vehicle, resulting in the caravan/camper trailer being assessed as a non identical vehicle, which means they cannot get bulk licensing. As a result of this, every single caravan/camper trailer has to be taken to a licensing centre and individually taken over the pits and registered. The time and monetary impost to small business to fulfill this requirement is excessive as one vehicle/van/trailer can take half a day to be licensed.

Decreasing the minimum number to say 10 of an identical type is more realistic. This would achieve time and cost saving for the dealer and a cost reduction to the consumer, with no effect on the licensing process.

### 6.2 Caravan/Motorhome Dealers Opening Hours

Under the current regulations motorhomes are not allowed to be available for viewing or sale by the public after 1.00pm on Saturday. This is because motor vehicles dealers must close their yards at 1.00pm on a Saturday.

As such, dealers that sell both caravans and motorhomes either close at 1pm as well or are required to remove the motorhomes off their sale premises between 1pm–5pm on a Saturday. This is considered as a significant impost on trade and one which could be addressed by granting an exemption to those dealers which operate a mixed caravan/motorhome yard to allow all day trading. This should be quite separate to the motor vehicle dealers regulations as motorhomes are more closely aligned with caravans than motor vehicles.

### 6.3 Tenant Bond Disposal

The process to recover bond monies when a tenant defaults or refuses to sign the bond disposal forms or defaults on rent remains unnecessarily complex and costly. The Department of Commerce is the bond administrator yet has no jurisdiction other than for the normal lodgment and disposal of bonds. The Act requires disputes associated with bonds to be determined by the State Administration Tribunal (SAT).

However, the SAT has no process to provide for the recovery of expenses by the park operator and there is no interaction or communication between the two departments. A solution would the transfer of authority to the Department of Commerce Bond Administrator.

Additionally, it is a requirement that the same individual who signed the bond lodgment form must sign the bond disposal form. This is not always practical as the same staff may no longer be employed. This could be resolved by allowing duly authorised staff to sign the disposal form.

### 6.4 Annual Licenses under the Caravan and Camping Ground Act

Presently there is a requirement under the legislation that Local Government licenses caravan parks annually following an inspection.

The reality is that Local Government often does not have the resources to complete inspections and issue licences in a timely manner. This results in caravan parks being unlicensed for a period of time and under the legislation these caravan parks should not be operating their business. There are also potentially serious implications regarding liability insurance for park operators who continue to operate without a current licence.

A solution is for caravan parks to be inspected on a minimum triennial basis (or more frequently at the discretion of Local Government) and each licence to be valid for three years.

## 6.5 Town Planning Scheme Zoning – Impact on Land Values

Some Local Authorities, the WAPC and TWA are of the opinion that the development opportunities provided for by the “tourist” and “residential” zoning is the main contributor to caravan park closures, and that owners are simply opting for a more profitable return than that available from a caravan park. In some instances this is the case.

More noticeable has been the rising over heads, thus reduced viability of caravan parks within a ‘tourist’ or ‘residential’ zone. The rising over heads are created from higher land tax bills; council rates accelerated by the changed criteria applied by the Valuer Generals Office; increasing water rates; increasing power charges; and the need to provide improved facilities, amenities and accommodation choice.

It is acknowledged that rezoning existing caravan parks to a ‘use specific’ zone such as “caravan park”, will have the effect of reducing/removing land tax as its use is now considered the ‘highest and best’ for the land. However, such an outcome will have an even greater impact on the longevity of some caravan parks as it significantly reduces the capital value of the land, often 20% - 30% (WAPC, 2006), thereby having a number of significant and devastating outcomes, particularly at such an uncertain time for credit providers.

If rezoned to ‘caravan park’ the land value on which the caravan park is situated will be significantly reduced. Many caravan parks are family owned and the land is their major asset and/or superannuation, a devaluation will effectively destroy their business and long term financial security. In the case of a company owned park a reduction in property values may be seen as a devaluation of an expendable item within a larger portfolio, facilitating its sale, redevelopment or closure.

A reduction in the value of the land also reduces the borrowing capacity for either the family or company owned park. A reduction in borrowing capacity compromises the ability for an owner to meet the expectations of their customers (long stay residents and holiday makers) of improved amenities/facilities and wider accommodation choice. To offset the reduced borrowing capacity, park owners will need to increase the amount of long stay residents, an issue already acknowledged as a concern to Government.

However, when establishing a new caravan park, the need for a ‘caravan park’ zone is supported. The highest and best use is achieved from the commencement of the business resulting in minimal if any land tax. Further, the use specific zoning ensures that both the operator and Local Government Authority have certainty as to the preferred long term use of the land, thereby removing speculation.

## 6.6 Land Tax

With reference to 6.5 a site specific zoning is not the answer. The abolishment of Land Tax for all caravan parks (tourist, mixed or residential), irrespective of the zoning of the land, is considered by the CIAWA as the most appropriate, effective and socially responsible solution to assist in the retention of caravan parks in WA.

Abolishment of land tax is not new or unique within Australia. At present Land Tax on caravan parks, other than within the Australian Capital Territory or Tasmania has been exempt with or without conditions. A 100% exemption, conditional on the retention of the caravan park is considered necessary in Western Australia as:

- ◆ A 100% exemption on Land Tax and not rezoning to “caravan park”, preserves land value, ensures asset protection and improves the borrowing capacity of the owners;
- ◆ Is an incentive for land owners to remain a caravan park, thereby providing affordability and choice for holiday makers and long stay residents; and
- ◆ Reduces the pressure for affordable housing and choice to be provided by the public sector.

## 6.7 Flexibility on Occupants and Accommodation Types

The many external factors that impact on the viability of a caravan park have been described. To ensure a sustainable business model which responds to changes in consumer expectations and cash flow demands, a caravan park owner must be able to ‘self regulate’ the ratio between holiday makers and long stay residents.

The CIAWA provides a balanced approach to this issues as it represents all types of caravan parks, caravan dealers, manufacturers, and service providers. The trades component of the CIAWA, considered the need for a minimum number of powered sites to be available for caravans (excluding park homes), RV’s, tents and camper trailers. This may be seen by some as being at odds with the need for flexibility but, all components of the industry need to be viable for it to remain a sustainable industry. The CIAWA recognises the need for appropriate numbers of tourist sites in caravan parks and believes the most sustainable way of achieving that balance is through the natural economic forces of supply and demand. The replacement of powered sites with either cabins or park homes becomes economically counter-productive in some cases depending on the tourist demand in each park which has a naturally balancing affect.

## 6.8 Residential Caravan Park

The sustainability needs and issues associated with a residential caravan park go well beyond the implications of the current and proposed town planning framework. However, the town planning framework has made assumptions and introduced limitations which are to the detriment of this sector of industry and need amending.

A residential park is not necessarily a park home park or ‘aged care village catering for our aging population’ and can be located in a wide number of locations (urban and rural). As such the core demographics may vary from location to location. The proximity to social services therefore needs to be merits driven on an application by application basis.

Of significance the Government must openly recognize the vital role residential caravan parks play in the provision of affordable housing and choice. Beyond the scope of this report, once openly valued as a provider of such accommodation, there is the need to review not only land tax, but council rates, and the cost of water and power, to allow the continual provision of affordable housing and choice.

The WAPC via PB 71 seeks assessment of residential caravan parks as if a conventional residential development. The design provisions contained within the Caravan and Camping Ground Regulations 1997 are considered by the CIAWA to produce a higher level of residential amenity, and a greater sense of community. Improved housing choice and the creation of a greater ‘sense of place’ can also be achieved via application of the Regulations than conventional subdivision provisions.

To place restrictions on residential caravan parks that force developers to pay urban priced land renders affordable housing of this nature impossible to achieve. The appropriate use of rural land within the existing regulation framework is essential to provide more residential caravan parks as affordable housing options thereby reducing the requirement on public sector resources to provide alternatives.

## 6.9 Town Planning Process

Concern over ‘self regulation’, is acknowledged, as is the likely concern over the use of the Caravan and Camping Ground Regulations 1997 (as amended) as the principal assessing instrument. However, the role of Local and State Government to guide development remains unchanged. The CIAWA merely seek the inclusion of appropriate provisions (refer section 4.5) to ensure a co-ordinated approach towards more sustainable outcomes.

Improved sustainability can also be achieved from a general increase in the understanding of the caravan industry by all decision makers.

## 7.0 IMPLEMENTATION/RECOMMENDATIONS

The suggested recommendations contained within this Report are across all aspects of Government, thus re-enforcing the need for a more collaborative approach to the sustainability and management of the industry.

It is also acknowledged that current resourcing and priorities will influence the consideration and effective implementation for some recommendations. Those of a financial or licencing nature will require consideration by the relevant authority(s) whilst those limited to development are most appropriately implemented via Local Authorities within Local Tourism Strategies and/or Town Planning Schemes, or the WAPC when next reviewing the relevant policies or schemes.

### 7.1 Summary of Recommendations

#### Recommendation 1:

When next reviewed, state and/or local town planning policies be modified to provide greater acknowledgement on the importance the caravan and camping industry has in the provision of affordable tourism and long stay accommodation.

#### Recommendation 2:

When next reviewed, state and/or local town planning policies be modified to give consideration to the ‘definitions’ provided by the CIAWA in this Report.

#### Recommendation 3:

When next reviewed, state and/or local town planning policies be modified to acknowledge the Caravan and Camping Ground Act 1995 and Caravan and Camping Ground Regulations 1997 as the principal town planning instrument to guide the design and management of all caravan parks.

#### Recommendation 4:

When next reviewed, state and/or local town planning framework, give strong consideration to inclusion of more sustainable town planning provisions which may include but not be limited to:

- ◆ The need for a site by site analysis of the type of caravan parks developed within the relevant region – to be undertaken at the Local Tourism Strategy stage;
- ◆ No restriction on accommodation type;
- ◆ Retain current zonings for all existing caravan parks;
- ◆ The need for all newly developed caravan parks to be zoned ‘caravan park’;
- ◆ Acknowledgment that long stay residents have an important role to play in the economic and social wellbeing of a local community;



- ◆ Provisions that provide for additional long stay residents within a caravan park, which where possible do not result in a net reduction in the number of existing tourism sites/units;
- ◆ Provisions to suggest the need for additional park homes or long stay residents to be located within areas of a caravan park which is presently vacant or occupied by unpowered sites;
- ◆ Design criteria suggesting that park homes and long stay residents, where possible, should not be located within the park to the detriment of tourist sites and facilities and should be separated from the tourist component of the park;
- ◆ Recommendations seeking the need for a definable improvement to tourism facilities within the park should additional permanent residents be approved.

#### Recommendation 5:

Department of Planning and Infrastructure and Tourism Western Australia actively pursue the release of additional appropriate crown land for the purpose of “caravan park” development. Where Crown Land is offered as a leasehold, all lease terms to be not less than 50 years, with a 50 year option thereafter.

#### Recommendation 6:

When next reviewed, the Department of Transport review current restrictions on the bulk licencing of caravans.

#### Recommendation 7:

When next reviewed, the Department of Commerce review current restrictions on the opening hours for caravan and motorhome dealers.

#### Recommendation 8:

When next reviewed, the Department of Local Government review current regulations and processes associated with the annual licencing of caravan parks under the Caravan and Camping Ground Regulations.

#### Recommendation 9:

During the next budget review process, State Treasury review current prohibitive price structuring as they relate to the caravan and camping industry for:

- ◆ State Land Tax;
- ◆ Essential services (power and water); and
- ◆ Stamp Duty on motorhomes.

#### Recommendation 10:

When next reviewed, Planning Bulletin 71 be modified (or replaced) to allow Residential Caravan Parks within ‘rural’ zoned land where appropriate social facilities and services are available to support the provision of affordable housing for our aging demographic.

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Figure 1

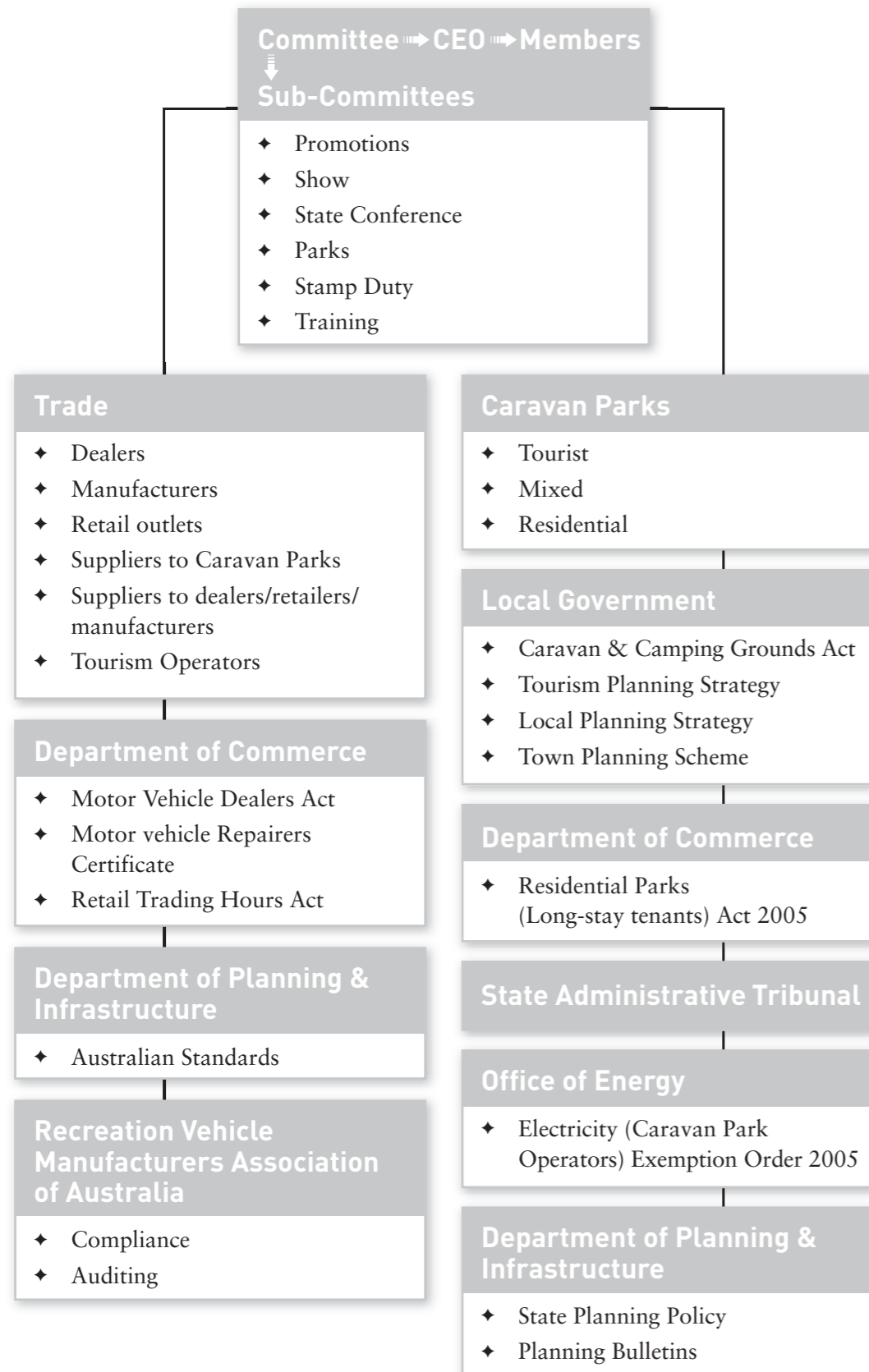


Table 1



REGION	2004						2005						2004-2007 Trend
	DOMESTIC			INTERNATIONAL			DOMESTIC			INTERNATIONAL			
	CP	TOTAL		CP	TOTAL		CP	TOTAL		CP	TOTAL		
Experience Perth	198,000	6%	3,161,000	21,100	4%	571,800	164,000	6%	2,826,000	15,600	3%	610,000	Dom: Stable Intl: 1% decline
Australia's Coral Coast	186,000	31%	606,000	32,900	48%	68,900	165,000	29%	571,000	21,300	34%	61,900	Dom: 3% increase Intl: 8% decline
Australia's North West	162,000	31%	517,000	25,500	50%	51,100	134,000	26%	513,000	23,100	43%	53,800	Dom: 9% decline Intl: 10% decline
Australia's South West	315,000	16%	2,026,000	21,200	21%	98,900	320,000	17%	1,879,000	16,800	16%	107,100	Dom: stable Intl: 2% decline (2005 - 2007 3% decline)
Australia's Golden Outback	200,000	26%	782,000	17,200	37%	46,000	182,000	28%	651,000	12,300	31%	40,200	Dom: 4% decline Intl: 1% decline

REGION	2006						2007						2004-2007 Trend
	DOMESTIC			INTERNATIONAL			DOMESTIC			INTERNATIONAL			
	CP	TOTAL		CP	TOTAL		CP	TOTAL		CP	TOTAL		
Experience Perth	204,000	6%	3,212,000	20,200	3%	601,500	202,000	6%	3,26,000	21,400	3%	631,300	Dom: Stable Intl: 1% decline
Australia's Coral Coast	206,000	35%	585,000	22,900	37%	61,400	194,000	34%	567,000	25,500	39%	65,600	Dom: 3% increase Intl: 8% decline
Australia's North West	138,000	20%	675,000	26,100	43%	60,900	112,000	22%	505,000	25,800	40%	63,900	Dom: 9% decline Intl: 10% decline
Australia's South West	318,000	16%	1,966,000	18,300	18%	102,200	319,000	16%	1,950,000	23,900	19%	128,700	Dom: stable Intl: 2% decline (2005 - 2007 3% decline)
Australia's Golden Outback	134,000	17%	778,000	15,900	38%	42,300	159,000	22%	737,000	19,100	36%	52,900	Dom: 4% decline Intl: 1% decline



## SHORT TERM DEMAND TRENDS BY REGION

### Experience Perth

- ◆ Average bookings up/steady
- ◆ Easter in April had negative impact on March bookings
- ◆ Rest of the year is expected to be same as last year

### Coral Coast

- ◆ 1st quarter bookings slightly up
- ◆ Future bookings slightly up/expected to be up
- ◆ Easter in April had negative impact on March bookings

### South West

- ◆ Bookings up
- ◆ Traditional time of year to go down south
- ◆ Trend to cheaper accommodation (basic cabins, sites) which can result in bookings up but turnover down
- ◆ Upcoming holidays (winter and Christmas) looking strong
- ◆ West Coast more frequented in 1st quarter, South Coast more frequented in 2nd quarter of 2009

### Golden Outback

- ◆ Bookings up

### North West

- ◆ Average bookings are steady to down
- ◆ More workers than travellers
- ◆ January – March is not typical travelling time in North West
- ◆ Disrupted roads in wet season
- ◆ June – September expected to be good season

### General trends:

- ◆ People are booking later
- ◆ Cheaper accommodation is in higher demand
- ◆ Easter in 2nd quarter which results in 1st quarter booking numbers being down compared to last year
- ◆ Less bookings, more walk-ins, more last minute bookings
- ◆ April is expected to be good due to Easter holidays

Source: CIAWA Member Research, first quarter 2009



## CARAVAN PARK CLOSURES IN WESTERN AUSTRALIA

### Pre 1st July 2005

◆ Ashburton Travellers Park	Onslow
◆ Caravan Village Caravan Park	Gosnells
◆ Donnybrook Caravan Park	Donnybrook
◆ Goomalling Caravan Park	Goomalling
◆ Greenacres Beachfront Caravan Park	Dunsborough
◆ Ledge Point Caravan Park	Ledge Point
◆ Palm Beach Caravan Park	Rockingham
◆ Travellers Caravan Park	Gosnells
◆ Gorges Caravan Park	Wittenoom
◆ Wilson Inlet Caravan Park	Denmark
◆ Yellowdine Caravan Park	Southern Cross
◆ Peninsula Caravan Park	Mandurah
◆ Capricorn Village	Yanchep
◆ Separation Point Caravan Park	Geraldton

### Post 1st July 2005

◆ South Hedland Caravan Park	Port Hedland
◆ Estuary Caravan Park	Mandurah
◆ Preston Beach Caravan Park	Preston Beach
◆ Peppermint Grove Caravan Park	Capel
◆ Yalgorup Eco Park	Mandurah
◆ Acacia Caravan Park	Busselton
◆ Frenchman's Bay	Albany
◆ Oyster Harbour	Albany
◆ Doonbanks Caravan Park	Augusta

### Possible

◆ Timbertop Caravan Park	Mandurah
◆ Belvedere Caravan Park	Mandurah
◆ Bathers Paradise Caravan Park	Esperance
◆ Kingsway Tourist Park	Kingsway





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