



DRAFT LOCAL PLANNING SCHEME POLICY NO. 51: CARAVAN PARKS & CAMPING GROUNDS

**Adopted on the XXth Month 20XX in accordance with
Schedule 2, Part 2 of the *Planning & Development (Local Planning
Schemes) Regulations 2015***

1. INTRODUCTION

This Local Planning Policy has been prepared under the *Planning and Development (Local Planning Schemes) Regulations 2015* (the Regulations) and the *Shire of Denmark Town Planning Scheme No. 3* (the Scheme).

The purpose of this policy is to provide guidance for applications for Caravan Parks in the Rural and Tourist zones.

2. OBJECTIVES

This Policy aims to:

- Identify standards for the development of caravan parks and camping grounds in the Rural Zone.
- Enable the approval of small-scale caravan parks and camping grounds in appropriate circumstances.
- Clarify interpretations and facility requirements relating to 'nature-based' parks.

3. DEFINITIONS

Definitions for terms used in this Policy are consistent with the Scheme, the Regulations and the *Caravan Parks and Camping Grounds Regulations 1997*. This includes:

Caravan Park – means an area of land specifically set aside for the parking of caravans and park homes or for the erection of camps on bays or tent sites allocated for that purpose.

Nature Based Park – means a Caravan Park developed in a natural setting as defined in the *Caravan Parks and Camping Grounds Regulations 1997*.

The *Caravan Parks and Camping Grounds Regulations 1997* define a Nature Based Park as a facility in an area that –

- (a) is not in close proximity to an area that is built up with structures used for business, industry or dwelling-houses at intervals of less than 100 m for a distance of 500 m or more; and
- (b) has been predominantly formed by nature; and
- (c) has limited or controlled artificial light and noise intrusion.

4. DEVELOPMENT APPROVAL REQUIREMENTS

Application may be made for approval of a Caravan Park in the Rural Zone (SA) or the Tourist Zone (AA).

A detailed management plan as required by the *Caravan Parks and Camping Grounds Regulations 1997* is to be submitted at the time of applying for planning approval. This is to discuss how the park will be designed and operated, including:

- site planning
- services and amenities
- waste management
- traffic management

Document Control

Draft Policy Council Adoption:

Final Policy Council Adoption:

Policy Review Date:

Officer Responsible:

SOD File Ref:

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX

As required

Director of Assets & Sustainable Development

PLN.70.P

- risk management, including emergency response
- environmental impacts and sustainability
- market segment being targeted
- length of stay of guests
- guest code of conduct
- outline of management responsibilities

If located in a designated bushfire prone area, applications must also be supported by a Bushfire Management Plan and Bushfire Emergency Evacuation Plan as prescribed in the *Guidelines for Planning in Bushfire Prone Areas*.

In addition to the requirement for development approval, all caravan parks and camping grounds are required to apply for a license to operate and meet the servicing, infrastructure and safety requirements of the *Caravan Parks and Camping Grounds Regulations 1997*.

5. POLICY PROVISIONS

5.1 General Requirements

5.1.1 Caravan parks should be located and developed so as to avoid impacting on landscape values.

This includes avoiding ridge lines, escarpments or visually exposed sites, being situated where screening by vegetation or landform can be utilised, and having buildings developed with a design, materials and colours that minimise visibility from off site.

5.1.2 A caravan park that is proposed to have more than 4 sites must have its primary access from a sealed road.

Where the primary road access to the site is not sealed the Shire may limit the number of sites, approve a proposal subject to road upgrades being completed by the proponent, or require a financial contribution in lieu of works.

5.1.3 A caravan park may not be situated on a vacant property. A caretaker or manager must be resident on the property while the park is being operated.

5.1.4 Within the Rural Zone a minimum 50 metre setback should be maintained from caravan/ camping sites and common infrastructure to all neighbouring property boundaries.

Within the Tourist Zone the standard setback distances apply.

In circumstances where the existing lot size, development or vegetation does not allow for these setback standards to be achieved, variations may be supported where a proposal can demonstrate that it has maximised setback distances, provided sufficient screening and implemented appropriate management measures to address the concerns of neighbouring landowners.

5.1.5 Contact details of the designated park manager and an approved guest code of conduct are to be provided to adjoining landowners.

Document Control

Draft Policy Council Adoption:

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX

Final Policy Council Adoption:

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX

Policy Review Date:

As required

Officer Responsible:

Director of Assets & Sustainable Development

SOD File Ref:

PLN.70.P

5.2 Size/Scale of Caravan Parks

- 5.2.1 Caravan Parks with up to 4 sites may be supported within the Rural Zone generally.
- 5.2.2 Caravan Parks with up to 20 sites may be supported within the Rural Zone where a property is also identified 'Tourism Precinct' within the Local Planning Strategy.
- 5.2.3 Caravan Parks with more than 20 sites will only be supported within the Tourist Zone.
- 5.2.4 Where a property within the Rural Zone contains multiple different forms of tourist accommodation and/or non-rural land uses, the Shire will determine the maximum number of accommodation units that are appropriate on the site.

This should aim to preserve the predominant use of the site for rural land uses, except where a property is within a 'Tourism Precinct' identified in the Local Planning Strategy.

- 5.2.5 For caravan parks that are existing at the date of the adoption of this policy the diversification of accommodation types is generally supported subject to the retention of a minimum of 50% of sites remaining for short-stay use by caravans and camping.

5.3 Nature Based Parks

- 5.3.1 While nature based parks should be located in a predominantly natural setting, it is acknowledged that this may include a modified, agricultural landscape in acknowledgement of the need to consider bushfire safety requirements.
- 5.3.2 Nature based parks may not have any buildings or structures located on individual sites, including on-site caravans.
- 5.3.3 Nature based parks are to be provided with the following minimum level of services:

- a) Water supply

A centrally located potable water supply is to be made available to service all sites. Where a reticulated water service is not available, this supply is to comprise of rainwater tanks with a minimum capacity of 10,000 litres per caravan/ camping site.

In addition to a potable water supply, a permanent water supply of minimum 10,000 litres is to be provided on site and made available for fire-fighting purposes (accessible by a DFES approved coupling for emergency purposes only and with emergency vehicle access provided within 4 metres of the supply).

- b) Rubbish collection

Bins for rubbish collection are to be provided at a minimum rate of 1 waste and 1 recycling bin per 4 caravan/ camping sites.

Details of bin storage areas and rubbish collection arrangements are to be provided within a park management plan.

- c) Toilets/ dump point

Document Control

Draft Policy Council Adoption:
Final Policy Council Adoption:
Policy Review Date:
Officer Responsible:
SOD File Ref:

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX
00 Month 20XX (Item 0.0.0) – Resolution No. XXXX
As required
Director of Assets & Sustainable Development
PLN.70.P

Toilets are to be provided at a rate of 1 toilet per 10 sites or part thereof, except where a park is proposed to cater to self-contained vehicles only.

Where a park is proposed to cater to self-contained vehicles only, a communal chemical soil waste dump point is to be provided:

- At a central location on site; or
- At an accessible location on an adjacent property, with access secured through an appropriate legal mechanism; or,
- At a publicly accessible dump point, subject to an annual license agreement and fee being paid to the Shire for the provision of this service.

On-site effluent disposal systems are to be provided to a standard approved by the Department of Health.

5.3.4 A maximum of 4 sites may be supported at a nature based park and the length of stay of guests is limited to 3 nights.

This may be varied where a park provides on-site toilets, showers, handbasins, kitchen, washing up and other facilities at a rate that will appropriately service park guests, in accordance with the *Caravan Parks and Camping Grounds Regulations 1997* and to the satisfaction of the Shire.

Related Policies	<p><i>Local Planning Policy No. 7: Second Dwellings/ Additional Houses and Chalet Developments on Rural Zoned Lots</i></p> <p><i>Local Planning Policy No. 19.5: Holiday Home Policy</i></p> <p><i>Local Planning Policy No. 46: Karri Mia Tourist Zone Design Guidelines</i></p>
------------------	---

Document Control

Draft Policy Council Adoption:

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX

Final Policy Council Adoption:

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX

Policy Review Date:

As required

Officer Responsible:

Director of Assets & Sustainable Development

SOD File Ref:

PLN.70.P

Related Procedures and Documents	<i>Shire of Denmark Town Planning Scheme No. 3 Planning and Development (Local Planning Schemes) Regulations 2015 Caravan Parks and Camping Grounds Regulations 1997</i>
Adopted	Version 1 adopted XX Month 20XX.

Document Control

Draft Policy Council Adoption:

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX

Final Policy Council Adoption:

00 Month 20XX (Item 0.0.0) – Resolution No. XXXX

Policy Review Date:

As required

Officer Responsible:

Director of Assets & Sustainable Development

SOD File Ref:

PLN.70.P

SCHEDULE OF SUBMISSIONS

Draft Local Planning Policy 51: Caravan Parks & Camping Grounds

Submissions Received from Public

Ref No.	Submitter Details	Verbatim Submission	Planning Services Comment
1	[REDACTED]	<p><i>Survey form submitted via Your Denmark</i></p> <p><i>Do you support the proposed Local Planning Policy for Caravan Parks & Camping Grounds?</i></p> <p>Yes</p> <p><i>What are your questions, comments or concerns?</i></p> <p>This letter is in response to the proposed Local Planning Policy for Caravan Parks & Camping Grounds. I notice that there is no uniform response to an "unauthorised land use or development", but rather a variety of fines that vary greatly. My concern is that the response to an unauthorised caravan park may be a single fine, and that the owner of the development free to continue running their enterprise after paying it.</p> <p>I recommend that the shire consider the 50 metre minimum setback distance from other properties (as outlined in the draft) is increased to 200m in rural zones, and that if the park owner requests the setback size be reduced, adjacent landowners have the ability to deny this. I am concerned that park owners are not required to implement means of reducing noise or preventing their guests from trespassing onto neighbouring properties.</p> <p>I request the shire prevent dogs and cats where caravan parks are within 500m of neighbouring housing, national parks, or where the neighbours have directly requested they be banned, to manage noise impacts, protect native fauna and conserve child safety.</p> <p>I suggest that the shire mandate that they will thoroughly consult with landowners when a caravan park with more than 4 sites is being developed adjacent to them.</p>	<p>Noted.</p> <p>There are a variety of compliance options and fines available and the Shire will pursue these if necessary, depending on the circumstances of the case. It is not the case that an operator may continue with an unauthorised or non-compliant land use after receiving a fine, and planning legislation also provides for daily penalties in some cases.</p> <p>The proposed 50m setback is an increase to the standard 15m setback (side and rear boundaries) within the Rural Zone and is one of a number of responses that can be considered to minimise potential impacts on neighbours. All applications will be assessed on merit and increased setbacks can be considered, noting that appropriate setbacks may be relative to lot sizes, topography and vegetation and existing development.</p> <p>The Caravan Parks & Camping Ground Regulations require dogs to be kept on a leash or in an enclosed area while within any caravan park. The Shire will ask all proponents to specify whether the park will accept pets and include this information as part of advertising/ referral of the application.</p> <p>'Caravan Park' is a SA land use in the Rural Zone, which means that advertising and/or referral to adjoining landowners is required for all applications made (including for 4 sites only).</p>

		<p>I request that when park owners are in breach of local development laws, regulations, and requirements, they be liable to not only the shire, but also adjacent landowners, and are required to directly compensate adjacent landowners when a breach has resulted in them being affected.</p> <p>With these conditions, I would support the proposed Local Planning Policy for Caravan Parks & Camping Grounds.</p>	<p>Compliance matters are addressed by the Shire in accordance with relevant planning and health legislation. This does not provide a mechanism for compensation of potentially affected parties, which is a matter for private civil action.</p>
2	<p>██████████ ██████████ ██████████</p>	<p>Introduction.</p> <ul style="list-style-type: none"> • ██████████ is a working vineyard situated in a stunning natural setting. As part of securing the vineyard’s long-term success, camping is now offered to provide additional accommodation in the region, and giving visitors more options to visit, stay longer and spend money. • The camping offered at the vineyard is best described as nature based camping. Campers come to connect with nature, to experience life on the land, and share our commitment to ‘leave no trace’ principles. <p>The Current Law as we understand it</p> <p>The Caravan Parks and Camping Grounds Regulations 1997 includes a provision (at Section 11) allowing a person to camp on private land. This is up to 3 nights in any 28 day period with the landowner's approval. In WA, local councils licence caravan parks or campgrounds come under the Caravan Parks and Camping Grounds Act 1995. Councils must be satisfied that the minimum standards, as set out by the Caravan Parks and Camping Grounds Regulations 1997, are met.</p> <p>In addition to a caravan park or campground, it is also possible in WA to seek approval from your local council to operate as a nature based park. A nature based park allows camping in a way that minimises impact on the natural environment and may have less amenities. The standards required of a caravan park vary from that of a campground and vary again for a nature based park.</p> <p>██████████ falls in to the nature Based park category. ██████████ is not a caravan park.</p> <p>Effect of Covid on Caravanning</p> <p>Covid has clearly affected Australians in many ways. Lock downs has meant that people want to travel. One of the key ways that people when</p>	<p>Planning approval and licensing under the Caravan Park and Camping Ground Regulations is required prior to the establishment of all caravan parks. Guidelines for nature based parks prepared by DLGSCI have recently been amended to include scope for nature based parks to be developed in a ‘rural’ setting.</p> <p>This provision relates to private camping, not commercial ventures, and also limits the extent to which land may be regularly or continuously camped on.</p> <p>A nature based park is one category of caravan park under the Caravan Park and Camping Ground Regulations, and although this includes reduced services and facilities requirements the same approval processes apply.</p> <p>The proposed policy does not support the development of nature based parks with no on-site servicing facilities. This has taken into</p>

they started to travel again, was that they bought large self-contained caravans. Self-contained is defined as the toilet waste and grey water are stored in the van and later dumped at certain dump stations around Australia....There is for example a dump station run by the Shire at the Denmark Visitor Centre. Also these new age vans have potable water storage and solar powered electrical systems Effectively these vans can go anywhere and not leave any evidence that they have been there. These caravan owners do not want to stay in caravan parks....they bought caravans that do not need to be parked in caravan parks.

Several caravan owners have sold their houses (Some have also rented their houses) and have "hit the road"..... perhaps their trip could last for several years. Several have brought their children to be part of the experience. Van owners have invested large sums of money in their equipment. Vans can cost up to \$200,000 each and the vehicle that pulls the van can cost up to \$150,000. So the equipment can cost up to 1/3rd of million dollars.

The [REDACTED] Rural Campsite Process.

[REDACTED] process includes the following:-

1. A three hectare paddock that is used by caravanners.
2. [REDACTED] ONLY allows self contained vans to park on the property. This mainly means that people with tents and smaller vans are not welcome unless they can prove that they are self-contained.
3. We joined the Hipcamp booking system. This system works in a similar fashion to Air BnB but is for rural camping. Hipcamp is used widely across Australia and also across other countries, it is a global system. In addition to providing the booking system, Hipcamp facilitates communication between the camper and the Host. Hipcamp also maintains Host and camper standards, that appear as rules when camper make their booking. These rules relate to issues of safety, good behaviour and can be modified to meet the [REDACTED] needs. Campers have to be self-contained, they are informed of this before and after they make their booking and then [REDACTED] asks them to confirm their setup, before arrival.
4. We allow vans to park for up to three days, this is controlled by Hipcamp.
5. We do not allow people to park permanently. We are not in the

consideration the potential cumulative environmental impacts, availability of public services, and consideration of health and safety as provided for by the Regulations. It is incumbent on a private business to provide services appropriate for fee paying guests, rather than pass responsibility and costs onto the Shire's ratepayers. Minimum facilities for nature based parks identified in the draft policy are substantially reduced from those required for other types of parks.

Self contained recreational vehicles and caravans cannot be sustained indefinitely and the majority require servicing after 2-4 days, dependent on their capacity and the number of occupants.

Noted. Full details of proposed caravan parks and camping grounds are to be provided as part of an application for planning approval and subsequent licensing.

business of being a medium to long stay site.

6. Hipcamp provides insurance for both [REDACTED] and the vans. Hipcamp Safe is a \$10 million Public Liability Insurance policy designed to respond to claims arising from guest injury and/or guest property damage and applies to all Hipcamp bookings.
7. We are also part of the Wiki camp process. Wikicamp is an information based system....it tells people what they can do in various places across Australia. Wikicamp tells people that if they want to stay at [REDACTED] they should book on Hipcamp.
8. [REDACTED] does provide access to water and power if the vans have emptied their tanks and batteries respectively. However the vast majority of vans are fully charged for the up to three days that they may stay.
9. During cellar door operating hours (effectively 11am to 5pm....but any other time is possible if people ask). Van owners and their families can use the cellar door toilets.
10. Van owners may also leave rubbish at the cellar door if they need to , but virtually all take their rubbish with them when they leave, after all these people are here to enjoy the environment they care about it! A regular inspection of the paddock has shown that no rubbish has every left...not even a piece of paper!
11. We have never had any problem with noise from the vans.....bare in mind three things:-
 - a. Most of the vans have children who will go to bed around 7 to 8 pm.
 - b. People will be careful with power usage. So they do not want to keep using power all night.
 - c. The vans are parked in a rural setting, the owners cherish the environment and the peace and quiet of the countryside.
12. The paddock where the vans park is directly opposite the house. People live in the house including the [REDACTED] owner. The cellar door is open every day....both the owner and staff make sure that the van owners are happy with the facilities that we provide. Any problems that may arise can be addressed very quickly.
13. The cellar door bar is available for tasting. Van owners often buy a bottle of wine to accompany their evening meal with the family back in their vans.

		<p>14. [REDACTED] adheres to all fire regulations and van owners are instructed about this policy. The use of fire pits during the non-fire season is strictly forbidden for example.</p> <p>15. [REDACTED] has a simple fire evacuation code.</p> <p>16. There is an asphalt road that leads directly to the paddock where the vans park.</p> <p>17. WE allow vans to park wherever they want on the paddock. They can be closer to others or more distant if they so wish. To a certain extent where they park depends on the van's ability to level up.</p> <p>Preferred Rural Campsite Model.</p> <p>[REDACTED] would prefer the following:-</p> <ol style="list-style-type: none"> 1. To use Hipcamp alone and not use Wikicamps. The reasons for this are that Hipcamp is much easier to control because bookings are made just like AirBNB does of houses. Hipcamp have insurance and as a result they attract a better clientele. It would be OK for Wikicamp to direct campers to Hipcamp in order to make a booking...but the fact that we currently only have three sites means that Wikicamp people just turn up and park. 2. Currently we have three sites available on Hipcamp. [REDACTED] needs to increase this number to ten....this will help us to be totally Hipcamp based. [REDACTED] has a three hectare site that has plenty of space for ten vans....but the beauty of the place is there is no overcrowding. During the winter it is very unlikely that many people would stay. During the summer ten vans would be a reasonable number at any one time, after all [REDACTED] is not a caravan park! [REDACTED] will continue to provide all of the services noted above in the "process section". 	<p>The booking method or platform used by the operator is not a relevant planning consideration.</p> <p>Not supported. The proposed policy includes a standard for a maximum of 4 sites on any one lot within the Rural Zone generally, and greater than 4 sites within designated Tourism Precincts in the Local Planning Strategy.</p> <p>This has been proposed to support the establishment of small scale and low-key proposals, with the aim of minimising potential impacts on the environment and neighbouring landowners, preserving rural and agricultural land uses as predominant in this zone, and minimising increases to traffic and road maintenance. This also aims to encourage tourism in strategic locations with appropriate access and infrastructure, and provides guidance for where tourism will be supported as the predominant land use within the Rural Zone.</p>
<p>3</p>	<p>[REDACTED] [REDACTED] [REDACTED]</p>	<p>Thank you for alerting us about the opportunity to comment regarding the draft planning policy. We are the owners of [REDACTED] (since April last year) and any changes will probably affect us in some way.</p> <p>Overall we can see the need for more camping areas in the Denmark Shire, especially over the Christmas and New Year period. During that time there were many people asking for a site but we had to send them</p>	<p>The proposed policy aims to provide clarity and consistency for proponents that enables them to develop and operate a park in a manner that meets the requirements of the Regulations. Any</p>

	<p>away as were fully booked. We then worry about people camping in the nearby bush, leaving rubbish and destroying the environment as there simply isn't anywhere else for them to go. An overflow area where people can stay the night in that case is really needed. We would hope that the Shire would make it very easy for every family who wants to offer their paddock or private land to accommodate those people during that peak time.</p> <p>One section that raised some questions from us was point 5.1.2: How would this affect an existing business like [REDACTED] as our primary access road is obviously not sealed. We don't believe this should be a problem. Our customers love the feeling of being a little bit more "in the bush". Most of them have 4WD vehicles as they also enjoy driving down the 4WD track to Boat Harbour. So a gravel road is no negative (though we do appreciate it when the corrugation gets levelled every now and then 😊). We have never had any negative comments from our customers. In the contrary – people say they hope Boat Harbour Road never gets sealed as it preserves a little "wildness" in this area that people enjoy. From our point of view a sealed road makes no sense as a requirement for a caravan park. Maybe for places like the Big4 where people expect a certain comfort but please don't make this a general requirement as it will ruin the "bush camping feel" that so many Australians and international visitors love.</p>	<p>landowner in the Rural or Tourist zones may apply to establish a caravan park or camping ground.</p> <p>The standards established in the policy will not apply retrospectively to existing approved caravan parks and camping grounds.</p> <p>The requirement for sealed road frontage aims to ensure that new, larger scale caravan parks are developed in accessible locations where increased traffic can be managed and does not result in increased road maintenance requirements, the costs of which are borne by the Shire's ratepayers.</p>
<p>4</p>	<p>[REDACTED]</p> <p><i>Survey form submitted via Your Denmark</i></p> <p><i>Do you support the proposed Local Planning Policy for Caravan Parks & Camping Grounds?</i></p> <p>Yes</p> <p><i>What are your questions, comments or concerns?</i></p> <p>We intend to apply ASAP for approval for a camping ground only allowing max 4 self contained vans for a maximum of 4 nights. We are a tourism precinct and therefore don't really fit into any of the categories. Please see attached for our feed back on draft policy.</p> <p>Please consider the following being included in the Planning Policy for Caravan Parks and Camping Grounds;</p>	<p>Noted.</p>

	<p>Section .3 Definitions of the Shire of Denmark’s Policy is limited in options. We feel that a Rural definition should be added. We offer neither a Nature Based category nor a Camp Ground category. Many properties offering overnight stays on their cleared farm land, do not qualify for either option. In the Department of Local Government, Sport and Cultural Industries ‘Developing or Redeveloping a Caravan Park or Camping Ground’ document lists multiple licencing options, including ‘Park Home Park and Transit Park.’</p> <p>As an operating tourism business on farmland, we neither fall under the definition of nature based, with us settled amongst vineyards.</p> <p>3.Definition (A) – The distance of 100m metres minimum is restrictive, an option for 50m-100m should be an option for the accommodation site on a rural tourism property, judged by each individual application and subject to the direction of the structure.</p> <p>Section 4. Development Approval Requirements We are a category who again would need to meet fewer requirements servicing ONLY to self-contained travellers. We suggest a policy of these suggested requirements in the DRAFT policy be subject to the individual offering of accommodation. Offering only self-contained accommodation we are not in need of offering amenities and waste management. However during opening hours tourists and caravan owners have full access to public facilities in our tourism business of a restaurant.</p> <p>Traffic management is not applicable to us. As an existing business our entry roads are used by tourists and locals daily, the campers continue up a non-accessible road to the public, to park their trailers.</p> <p>We would only offer maximum of 4 sites as the space for visitors is not larger and would not fit more comfortably.</p> <p>Feedback on Section 5.3.3</p>	<p>Approval can be sought for a caravan park or camping ground of any type under the ‘Caravan Park’ land use class. Proponents will need to nominate the type of park that they intend to seek a license for under the <i>Caravan Park & Camping Ground Regulations</i>. The Shire does not set or control the categories of park that are available in the Regulations.</p> <p>Guidelines for nature based parks prepared by DLGSCI have recently been amended to include scope for nature based parks to be developed in a ‘rural’ setting. Any other type of caravan park (as defined in the Caravan Park Regulations) can also potentially be developed within this context.</p> <p>This definition is provided for in the Regulations and not set or controlled by the Shire.</p> <p>The proposed policy does not support the development of nature based parks with no on-site servicing facilities. This has taken into consideration the potential cumulative environmental impacts, availability of public services, and consideration of health and safety as provided for by the Regulations. It is incumbent on a private business to provide services appropriate for guests attending, not pass these costs on to the Shire’s ratepayers. Minimum facilities for nature based parks identified in the draft policy are substantially reduced from those required for other types of parks.</p> <p>All parks proposed will be required to provide a site plan/s that demonstrates safe access to and within the property.</p> <p>Noted, this is consistent with the proposed policy standard for nature based parks in general rural areas.</p>
--	--	--

	<p>As a business offering accommodation for ONLY fully self-contained vans and camper vans on a rural property our offerings align with some points in both General requirements and Nature Based requirements. Therefore a third option to select is necessary to include diverse accommodation offerings.</p> <p>As a rural tourist business we only align with these point:</p> <p>5.1.2 - We only offer 4 sites</p> <p>5.1.3 - We are a caretaker living on the property</p> <p>5.1.4 - We have a more than 50m setback from the main road</p> <p>5.2.1 We have up to 4 sites</p> <p>5.3.1 we have modified agricultural landscape</p> <p>5.3.3 a,b,c we do not need to offer any of these items, only offering fully Self-contained accommodation.</p> <p>We already pay increasingly high rates where rural businesses do not receive the benefits of those paid rates. No waste management is offered to rural businesses yet we still pay the same rates as those town based businesses who do receive those benefits. As a result of this lack of waste management from the Shire, we already hire external waste management at an additional cost to our annual expenses. If what we offer is just fully self-contained accommodation we do not need to provide these extras.</p>	<p>Proponents will need to nominate the type of park that they intend to seek a license for under the <i>Caravan Park & Camping Ground Regulations</i>. Please refer above response regarding minimum facilities requirements.</p> <p>Noted. Full details of proposed caravan parks and camping grounds are to be provided as part of an application for planning approval and subsequent licensing.</p> <p>Charges for a waste collection service are in addition to rates, and are only applied where a property is provided with this service. If a landowner wishes to run a business that generates additional waste it will be their responsibility to either seek an increased collection service by the Shire (eg. additional bins) or via another means (eg. commercial provider).</p>
<p>5</p>	<p>██████████ ██████████ ██████████ ██████████ ██████████</p> <p>Thank you for the opportunity to make this submission to the Shire of Denmark proposed Caravan Park Policy.</p> <p><u>Background</u></p> <p>As you know, our company ██████████ is the owner and operator of the ██████████ in Denmark. Over a number of years, we have established a large scale holiday park which is highly dependant on seasonal tourism, mostly centred around the 4-6 weeks of December/January together with the 4 day Easter break where the park is either at or near to capacity, for the remainder of the year the park is well below full occupancy.</p> <p>We understand our park provides a large proportion of the base accommodation and camping capacity for the Denmark area. This capacity has taken significant investment over many years to establish, operate and ensure is compliant. Over the last two years alone we have invested significantly in new accommodation and associated services.</p>	

	<p>Due to the parks location at Ocean Beach, we have had to invest in upgrades to power, water and waste services to meet guest and regulatory standards.</p> <p>This background information is relevant when considering the Shires proposed Caravan Park Policy.</p> <p><u>Feedback to Draft Local Planning Scheme Policy No. 51</u></p> <ol style="list-style-type: none"> 1. The policy should be limited to approved tourist zones area and not 'rural areas under discretionary approvals'. 2. Approved caravan park sites should be compliant to the same standards as existing parks (on a pro rata basis dependant on guest capacity) - that is the applicant should be required to; <ol style="list-style-type: none"> a. Submit a development application and plan for the proposed park b. Complete a BAL assessment and subsequently provide a BMP and EEP c. Comply with the <i>Caravan Parks and Camping Grounds Regulations 1997</i> in regards to guest ablutions and other regulated amenities 3. Ensure new applicants are firstly approved and subsequently compliant. 4. Not allow informal operators who act like AirB&B in the holiday home accommodation industry to operate as informal caravan parks. 5. Approved parks in tourism zones should still have to comply fully with existing regulations and not avoid this compliance through the concept that some caravans and camper trailers are 'autonomous' thereby not requiring toilets, showers, camp 	<p>Noted.</p> <p>'Caravan Park' is a discretionary land use in the Rural Zone in Town Planning Scheme No. 3. This allows for application to be made to establish a caravan park or camping ground. The proposed Policy does not (and cannot) change this but does seek to set parameters around what is considered appropriate within the Rural Zone.</p> <p>Any proposal to establish a caravan park or camping ground requires development approval, which includes an assessment of bushfire risks in accordance with State Planning Policy 3.7 and the Guidelines for Planning in Bushfire Prone Areas. All proposals are also required to be licensed under the Caravan Parks Regulations and meet the requirements therein. The proposed policy aims to provide clarity for minimum requirements for nature based parks where the Regulations are unclear.</p> <p>Compliance matters are addressed by the Shire in accordance with relevant planning and health legislation.</p> <p>The proposed policy aims to increase awareness of the need for approval and clarify expectations for any landowner proposing to establish a business hosting caravans or camping. The Shire seeks to enable all businesses to be compliant with the relevant legislation and will pursue compliance action as appropriate.</p> <p>The Caravan Parks Regulations outline the minimum requirements for services and facilities for all types of parks and provide discretion to local government to determine the appropriate requirements in some instances. The proposed policy</p>
--	--	---

		kitchens etc. Larger operators also have guests with 'autonomous' caravans but are still required to comply with the various State and Local Govt regulatory planning and health standards.	aims to provide clarity and consistency for proponents that enables them to develop and operate a park in a manner that meets the requirements of the Regulations.
6	██████████ ██████████ ██████████	<p><i>Survey form submitted via Your Denmark</i></p> <p><i>Do you support the proposed Local Planning Policy for Caravan Parks & Camping Grounds?</i></p> <p>Undecided</p> <p><i>What are your questions, comments or concerns?</i></p> <p>Undecided at this stage as I have not fully understood the 'Local Planning Policy'. I'm only interested in having, a few, totally self sufficient campers, stay a night or two, and usually only in school holiday times, when all other large caravan parks are full. No additional structure, alterations or clearing required, just utilising already existing space.</p>	<p>Noted.</p> <p>The proposed policy aims to set minimum standards for the development of caravan parks in the Rural Zone, including the minimum level of services and facilities for nature based parks where the Caravan Park Regulations do not directly prescribe this. Shire officers can assist with enquiries regarding approval requirements and circumstances for individual properties as required.</p>
7	██████████ ██████████ ██████████	<p><u>Caravan Parks & Camping Grounds Local Planning Policy Submission</u></p> <p>During the Covid period we ran a small farm stay campground as we believed we were allowed to have three self-contained caravans for 3 nights and then this was increased to 8. We have now received a letter from the shire telling us we must get full planning for a full-sized park as per the WA State Regulation. We only want to be a small farm stay campground with up to 10 sites for self-contained vehicles which there is great demand for in our area.</p> <p>The draft discussion paper is posing an allowance of 4 sites which we believe is not enough to meet the demand for this type of accommodation in the Denmark Shire. We understand there needs to be restrictions and the proper payment of fees and rates for the use of the land.</p> <p><u>Categories of visitors we have accommodated</u></p> <p>Couples in retirement travelling around Australia</p> <p>Families home schooling children traveling around Australia mostly from the Eastern States</p> <p>Young people working their way around the state looking for employment opportunities</p>	<p>Planning approval and licensing under the Caravan Park Regulations is required prior to the establishment of all caravan parks. There have been no recent changes to the relevant legislation affecting this requirement or the number of permitted caravans or camping sites.</p> <p>Not supported. The proposed policy includes a standard for a maximum of 4 sites on any one lot within the Rural Zone. This has been proposed to support the establishment of small scale and low-key proposals, with the aim of minimising potential impacts on the environment and neighbouring landowners, preserving rural and agricultural land uses as predominant in this zone, and minimising increases to traffic and road maintenance.</p> <p>The proposed policy supports the development of larger caravan parks (more than 4 sites) within designated Tourism Precincts in the Local Planning Strategy. This aims to encourage tourism in strategic locations with appropriate access and infrastructure,</p>

		<p>International travellers checking out the southwest at high speed, usually one-night stays West Australians holidaying in the Great Southern</p> <p>All of the above do stay in major caravan parks if they can get in but most cannot afford to do it all the time. Some travellers will not stay in large parks and would pass the town by. The shops, restaurants and tourist activities would miss out on that revenue. Also, there are people who want the serenity of spending a few days quietly on green grass and taking in nature in this beautiful place, Denmark.</p> <p>Extra sites would be an advantage to the backpackers working their way around the state, having a secure low-cost place to stay and work in the area. Businesses in the Denmark region are missing out on these workers because there is no where to stay.</p> <p>Some of the campers would have been classed as no fixed abode in the last census so would have been classed as homeless. If these families were not on the road the housing crises would be much worse around Australia.</p> <p>We believe the 4 sites proposal is far too low to meet the needs of the traveling public. Going to a 20 sites park is not what we want to do. This would not be allowed as we are not in a Tourist Zone. The 20-site park would spoil the concept of the farm stay concept. Up to 10 sites would allow us to accommodate the campers in peak times.</p>	<p>and provides guidance for where tourism will be supported as the predominant land use within the Rural Zone.</p> <p>Officers suggest that demand for sites in caravan parks and camping grounds can be adequately met in existing parks, land in the Tourist Zone, large caravan parks within Tourism Precincts, and small caravan parks elsewhere within the Rural Zone.</p> <p>Caravan parks can support longer term accommodation where appropriate facilities are provided and long stay sites approved in accordance with the Caravan Parks & Camping Grounds Regulations. This does not include nature based parks which provide a reduced level of services and infrastructure and are not appropriate to support ongoing residential accommodation.</p> <p>Not supported, as discussed above.</p>
8	<p>██████████ ██████████ ██████</p>	<p><i>Survey form submitted via Your Denmark</i></p> <p><i>Do you support the proposed Local Planning Policy for Caravan Parks & Camping Grounds?</i> Undecided</p> <p><i>What are your questions, comments or concerns?</i> Guidelines are too difficult and appear to be harsh to protect the inefficient current licenced caravan parks who have a cartel and are making tourists Holiday memories of Denmark unpleasant</p>	<p>Noted.</p> <p>The proposed policy aims to acknowledge demand for small scale caravan parks and camping grounds and support an approval pathway to enable landowners to establish legitimate businesses. These are recognised as offering a different product type for visitors to the region, depending on their preferences.</p> <p>The development of services and infrastructure is required in</p>

			<p>accordance with the Caravan Parks & Camping Ground Regulations. The proposed policy provides clarity on the minimum services required for nature based parks, taking into consideration the potential cumulative environmental impacts, availability of public services, and consideration of health and safety as provided for by the Regulations. It is incumbent on a private business to provide services appropriate for guests attending. Minimum facilities for nature based parks identified in the draft policy are substantially reduced from those required for other types of parks. The Shire encourages all businesses to operate in accordance with relevant legislation and thereby from an equal playing field.</p>
9	<p>██████████ ██████████ ██████████</p>	<p><i>Survey form submitted via Your Denmark</i></p> <p><i>Do you support the proposed Local Planning Policy for Caravan Parks & Camping Grounds?</i> Yes</p> <p><i>What are your questions, comments or concerns?</i> We approached the Shire quite a while ago trying to gather information from them as to what we needed to do if we were thinking of setting up what was then called YouCamp which is now called HipCamp. We contacted the Shire on several occasions, tried to make an appt to see someone to no avail.</p>	<p>Noted.</p> <p>The policy and information brochure prepared aim to improve clarity on the approval and licensing requirements for operating a caravan park or camping ground.</p> <p>The Shire does not have any record of correspondence relating to this matter for this property. Shire officers have made direct contact with the submitter (30 May 2023) and are available to respond to further enquiries as required.</p>
10	<p>██████████ ██████████ ██████</p>	<p>We have a number of concerns that are not pressing but some of these are:</p> <ul style="list-style-type: none"> • Increased traffic • Children crossing the road near a 'blind bend' unsupervised • Dogs loose near both wildlife and livestock • Disposal of excrement (sewerage) • Environmental impact on the waterway along Scotsdale Road <p>I am not sure if these can be mitigated by guidelines but, I think our two greatest concerns are joggers/cyclists and other pedestrian road users who do not seem aware of the dangers and the 'free ranging' of dogs without fences etc.</p>	<p>The proposed policy provides for a maximum of 4 sites in a nature based park, which seeks to limit traffic concerns and other potential impacts on neighbours. Specific road traffic and pedestrian concerns can be raised for any application that is advertised, and will be addressed on a case by case basis.</p> <p>The proposed policy also requires provisioning for disposal of wastewater, with an on-site facility preferred in the first instance. The distance to waterways will be assessed as part of determining the most appropriate location for and form of on-site effluent disposal infrastructure.</p> <p>The Caravan Parks & Camping Ground Regulations require dogs</p>

	<p>overlooked by the Denmark Shire for the past 2 years, and it is to be congratulated that the Shire is now investigating and adhering to the policies contained in the Act.</p> <p>There is a history of caravan parks in Denmark. Due to compliance and financial viability, they have been closed now for several years being Rudyard Caravan Park & Wilson Inlet Caravan Park sites.</p> <p>██████████ pays a toilet tax from the Water Corporation of \$8000 every 60 days. This fee is charged as there is 72 toilets installed at the site from significant infrastructure installation, and from the requirement of being connected to the deep sewerage service of Denmark, due to proximity of the Denmark River and Wilson Inlet watercourses. The \$8000 does not include water usage or pumps. All the pumps and easement sewerage lines of 1.5 kilometres are owned by the caravan park, and the business is responsible for the repairs and maintenance of the infrastructure.</p> <p>To operate a commercial caravan park there is a requirement to provide specific services to patrons that are non-negotiable.</p> <p>If the Denmark shire councillors decide to adopt policies that lessens the legislated obligations required, it would enable the operation of campgrounds within the Shire at a lower operating and outgoing expenses, which only financially disadvantages the licenced compliant parks that are operating, who have significantly invested into their locations and adhered to planning requirements enforced by the Denmark Shire and Caravanning and Camping Act.</p> <p>It is vital the Denmark Shire takes proactive steps to create a fair and balanced approach so that the existing compliant campgrounds are not disadvantaged by new policies that could be adopted that are less stringent regarding regulations, infrastructure requirements and compliance.</p> <p>I have reviewed the proposal. I feel the clauses are reasonable and very generous regarding the current non-compliant campgrounds trading in the Shire. It is extremely costly to set up and operate a compliant campground. By making it compulsory to have the specific requirements</p>	<p>caravan parks and camping grounds, and the development of this policy aims to address overarching issues with the clarity of approval requirements and minimum standards, which will better support compliance responses where necessary.</p> <p>The proposed policy also requires provisioning for disposal of wastewater, with an on-site facility preferred in the first instance. The distance to waterways will be assessed as part of determining the most appropriate location for and form of on-site effluent disposal infrastructure.</p> <p>In accordance with the Caravan Park Regulations.</p> <p>Noted. The proposed policy aims to clarify requirements for approval and minimum services and infrastructure where this is not clearly defined in the Caravan Parks Regulations. The Regulations continue to apply and the Shire aims to enable all businesses to comply with regulatory requirements and thereby operate from an equal playing field.</p> <p>Whenever the Shire is responsible for setting conditions or standards for development, officers consider the balance between promoting successful businesses and local employment while appropriately addressing the needs of customers/ users, protection of the surrounding environment, and the interests of the Denmark community more broadly. It is not appropriate for planning assessment to consider or address competition between legitimate businesses, where these business are approved and operating in accordance with relevant legislation.</p>
--	--	--

		<p>installed to any proposed caravan park/ camping grounds, (that are mandated by the legislated WA Caravanning and Camping Act), will ensure the continuation of the safe, sanitary, and regulated standard, which is currently provided by the licenced caravan parks in the Denmark Shire, is retained, and maintained in our town.</p>	<p>Noted.</p>
13	<p>██████████ ██████████ ██████████ ██████████</p>	<p>Firstly we would like to encourage the policy changes being proposed by the Shire of Denmark for landowners who currently fit the description under the Caravan Parks and Camping Grounds Regulations 1997. After discussion with Craig today, we wish to submit information regarding the Model we have used to develop a website that connects self-contained travellers with farmers around Australia.</p> <p>When we established our business, Caravan Overnight Farmstay, we researched the WA Local Government Regulations, Health & Safety (including the WHO Guidelines for the Use of Wastewater, Excreta and Greywater) and the Leave No Trace guidelines, We used the earlier version, but the wording is the same in the extract from the Caravan Parks and Camping Grounds Regulations 1997 below: https://www.legislation.wa.gov.au/legislation/statutes.nsf/law_s4339.html page 6 Version 02-c0-01 As at 24 Jan 2017 Published on www.legislation.wa.gov.au</p> <p><i>11. Camping other than at caravan park or camping ground</i> <i>(1) A person may camp —</i> <i>(a) for up to 3 nights in any period of 28 consecutive days on land which he or she owns or has a legal right to occupy, and may camp for longer than 3 nights on such land if he or she has written approval under subregulation (2) and is complying with that approval;</i></p> <p>What makes us different to the other Camping websites?</p> <ul style="list-style-type: none"> • Traveller Members on our website must be self-contained and agree to the Terms & Conditions – see attached • Farmer Members also must agree to the terms and conditions. • Access to Farmers information is for members only to ensure Farmers safety and confidentiality. • Since the other Camping websites have been established, we have allowed Farmers to set a fee on their information page for the overnight stays if they wish. Some still have \$0 on their page and we recommend as friends of the Farmer, Travellers make a donation or help out. 	<p>Noted.</p> <p>Clause 11 of the Caravan Parks & Camping Ground Regulations 1997 relates to private, unpaid camping by individuals and not the operation of businesses that facilitate camping on private land. Subsequent parts of Clause 11 refer to limits of the duration that the land is being camped on and the website of the Department of Local Government, Sport & Cultural Industries states that <i>“If a property owner allows short-term camping to occur regularly on their property, they will still be operating a caravan park and need to comply with the requirements of the Act”</i> (www.dlgsc.wa.gov.au/local-government/community/caravan-parks-and-camping).</p> <p>Officers consider that it is appropriate that land that is regularly or continually being camped on has approval and addresses the minimum requirements established in the policy, in order to appropriately address health, safety and environmental concerns.</p> <p>The exchange of subscription costs, donations or service fees is considered to constitute payment that associates this activity with a business.</p>

- When a Farmer joins our website we check their proximity to a town – we do not want to compete with any local caravan parks, and have aimed to be an alternative between towns to enable people to tour in an area for longer.

Why did we set up the website? Because from our own experience in caravanning around Australia we could see the need. In consultation with a farmer friend, we decided that by setting conditions for allowing farmers to provide an unserviced parking space on their rural property for 1-2 nights some of the benefits would be:

- Extra expenditure in the area - RVers will be more inclined to stay in an area at least a day longer, so will more likely stay at the closest town's caravan park to freshen up, buy fuel in the town etc, etc
- The traveller is in a safe, restful environment
- The truck bays are left to the truckies
- Less environmental damage to flora & fauna habitat -The travellers are not seeking out parking spots in the bushland between towns
- Visitors may get to see around a working farm
- Farmers may get to show off their properties
- Farmers in isolated areas get to meet more people and chat (this proved to be a lifesaver for one of our Eastern States farmers according to his wife)

We do have some Farmers in the Denmark area on our website, and have made them aware of your proposal and the Local Govt Regulations. We hope to continue to support them and tourism into the future. If you would like any further information or comment, we would be happy to discuss with you.

DISCLAIMERS AS WRITTEN ON WEBSITE REGISTRATION

The Farmer agrees to the following terms and conditions:

- Farmers are responsible for displaying the Caravan Overnight Farmstay sign at entry gate or to the area allocated for parking.
- The farmer is to set aside an area suitable for access by a traveller, and should restrict access to areas other than that as required.
- The farmer is to provide no facilities, other than the area, unless he determines it is required.
- The period allowed for access to the required area is strictly no longer than 24 hours unless specifically permitted longer by the farmer.
- The farmer should maintain a suitable amount of public liability

The booking method or platform is not a relevant planning consideration. Planning approval considers the use of the land and the circumstances within which this is appropriate, which licensing (under the Caravan Park Regulations) ensures that camping facilities are appropriately services and operated.

There are undoubtedly many benefits to rural property owners and to travellers and for this reason the Shire aims to encourage landowners to legitimise their operations, while meeting regulatory and community expectations for preserving health, safety and environmental values.

		<p>insurance and advise his insurer of any change in conditions required under his policy.</p> <ul style="list-style-type: none"> • Caravan Overnight Farmstay in no way acts as a booking agent, but merely maintains a website to facilitate interaction between farmers and travellers. • Caravan Overnight Farmstay and its employees and directors in no way accept responsibility for any damage or actions by the traveller to the detriment of the farm or farmers. <p>The Traveller agrees to the following terms and conditions:</p> <ul style="list-style-type: none"> • Access to the designated area is always at the farmer's discretion, should he feel he has reasonable cause, access may be denied. • The period of allowable access to the designated area is strictly 24 hours and no longer unless clearly stated by the farmer/ landholder. • Access allowed is to the designated area and nowhere else on the property. Access is not allowed to any buildings, homes or sheds unless specifically allowed by the farmer. • Any restrictions stated or implied by the farmer must be adhered to. This includes access for pets, lighting of fires and any other restrictions deemed necessary by the farmer. • All travellers must adhere to the 7 principles of Leave no Trace. https://Int.org/learn/7-principles • Any Traveller may be deleted from access to the website, with no refunds, should the management receive detrimental reports from the landholders. • Caravan Overnight Farmstay in no way acts as a booking agent, but merely maintains a website to facilitate interaction between farmers and travellers. • Caravan Overnight Farmstay and its employees and directors in no way accept responsibility for any damage or actions during the said 24 hours allowable access 	
14	<p>██████████ ██████████ ██████████</p>	<p>In response to DSC's proposed draft policy for their approval of Caravan Parks, a caravan park owner/operator Jim Goodsell describes his experiences as a Caravan Park owner & as a surveyor of <i>free</i> illegal camping use of a MRDWA Roadside Valley of the Giants Parking Bay (the VHB) since 1994 when Denmark Shire Council awarded him Conditional Approval to set up ██████████ on Hay Location ██████ @ ██████████. Any application to establish a Camping Area should be subject of the Caravan Park & Camping Ground Act (1995)</p>	<p>Noted, responses provided below to specific issues raised.</p>

	<p>& to its Regulations (1997) in their totalities. If only one Conditional Approval is infeasible, then Operational Approval understandably cannot be granted. Feasibility should only be applied to an application which demonstrates socio/ economic/ ecological sustainability, essential for any Caravan Park's effective operability. The proposed Camping Areas's water catchment is also pertinent for perusal as a potential target of water borne pollutants. The currently approved quality Caravan Parks of DSC's & of Manjimup Shire's Walpole, are of respective sizes that number upwards from 40 sites. This parameter is a good indicator of a proposed Camping Area's tri-fold sustainability.</p> <p>RECOMMENDATIONS</p> <ol style="list-style-type: none"> 1. DSC's New Policy should clarify that any proposal to accommodate a small or large Caravan Park should be subjected to the CP&CA(1995) and to its Regs (1997) in their totalities through a process which has the equivalence of a Town Planning Scheme Amendment of relevant Current Acts & of their Regulations & which should continue to be administered by the DSC. The water catchment of any proposed camping area will be occupied by local residents whose interests & well-being should not be threatened by camping. 2. Prior to approving a new caravan/ camping site, DSC should ensure that as the Local Authority, it is obligated to establish the adequacy of the site's infrastructure, its access & capability of land to accommodate camping & ensure the availability of an on-site manager 24/7. 3. Relevant organisations (Government or otherwise) & DSC should impose unequivocal regulations/ requirements to ensure compliant camping in ways that protect the viability of all DSC's caravan parks & of their socio-economic-ecological environments. 4. Any overflow camping sites should comply with all relevant inter-organisational regulations/requirements so that relevant contingencies including insurances can be accommodated. 5. In order to effectively manage camping, ranger surveillance & the use of appropriate signage should be sustained. 	<p>Agreed. This is addressed in supporting information materials but additional reference to the need for licensing under the Regulations is proposed to be added to the policy.</p> <p>The proposed policy aims to consider and address potential impacts on neighbours, environment and the broader Denmark community.</p> <p>The Shire has the opportunity to assess and apply conditions to applications for development approval as well as applications for a license to operate a caravan park or camping ground made in accordance with the Regulations.</p> <p>Assessment of all proposals will aim to ensure that the requirements of relevant legislation have been met and potential impacts can be appropriately managed. It is not appropriate for planning assessment to consider or address competition between legitimate businesses, where these businesses are approved and operating in accordance with relevant legislation.</p> <p>The Shire aims to ensure all businesses are operating in accordance with relevant legislation. Insurances are the responsibility of each individual business.</p> <p>The Shire regularly undertakes inspections and responds to complaints regarding illegal camping and will continue to do so,</p>
--	---	---

INTRODUCTION

█ retired in 1994 as a Wildlife Research Scientist from his then employer the Western Australian Department of Conservation & Land Management. █ is the owner/operator of a camping & caravan park █ which underwent Denmark Shire's Town Planning Scheme Amendment for one year until the park's gazettal & commencement at the end of 1994. its website is █

The █ entrance is on the northern side of Highway One (WA's South Coast Highway) at Hay Location █ █ of the Denmark CBD in Western Australia. The █ k adjoins the Walpole Wilderness to its north & is █ south of the Tree Top Walk, an iconic tourist attraction. Collectively, the caravan parks of DS have never reported overfilling beyond capacity. Consequently, Mclean Park despite its funding of \$267,934 by the WA Tourism Commission in 2015 as an overflow camping facility (DSC Attachment 8.2.3e, 14/4/2015) has not been needed.

IMPACTS OF NON-CARAVAN PARK CAMPING

Free non-caravan park camping (e.g. Freedom Camping of the "RV friendly town movement" [RVM], HipCamping) poses potential costs in the forms of loss of revenue from communities, wildfires & waste-pollution by campers from all over the world. Sometimes it is not realised that Western Society has been & still is based on the safety anchor of effective sanitation that has made close settlement possible.

In response to comments by customers at his caravan park & by residents, █ (2014) began routine dawn surveying of numbers of camper groups & their vehicle details during an initial non enforcement period by DSC of 65 days of free illegal camping beginning 1B11212011 at a WA Dept Main Roads Roadside Parking Bay 1.5 Km east of the █ (the VHB). This survey is shown graphically (P5), some of its results are pertinent to DSC's current proposal:

- 11257 adults camped there during 1996 - 2011 (16 years). Initially without enforcement, campers numbered 28/week. one

with available resources.

Agreed, unregulated camping can create management issues and poses risks to the environment. The proposed policy specifies the Shire's expectations for the minimum provision of toilets and/or dump points in nature based parks. In all other parks the requirement for toilets and/or dump points is clearly specified in the Regulations.

Shire officers concur that the disposal of rubbish, provision of toilets/ dump points, and risk of unmanaged fires are three of the primary concerns with unregulated/ illegal camping and the proposed policy aims to address each of these concerns.

year later during enforcement, campers' numbers dropped to 3/week, 2 years later during enforcement, campers' numbers dropped further to less than 1/week. This indicates that DSC has the expertise to manage non-caravan park camping.

- MRWA 44 gallon rubbish bins overflowed & garbage, faeces, toilet paper & RV waste drainage were scattered around & under the units of campers from all over the world. Water flow events would transport such contaminants into the water catchment of the camping site. Such sights are not unusual on MRWA parking bays throughout WA.
- Generally, campers during wildfire periods generally seek a summer cool in WA's South & a winter warm in WA's North. The target holiday areas usually have sandy soils which are effective absorbers of liquid but poor retainers of pollutants. Itinerant campers do not experience the change of their sand dry venue to one of smelly sodden substrates caused by winter rain causing a re-surfacing of underground water (see ██████████ 1990). This was the non-enforcement experience at the VHB. At 2013 winter's end at the VHB creek flowing through the Nornalup Station Rd culvert 4Km from its origin at the VHB, had a similar stench & colouration as septic tank effluent.
- Burning campfires were un-attended. Three midsummer campfires were extinguished by the local community on 19/12/2011, 19/02/2012 & 19/03/2012.
- The cumulative value at the close of 2011 for numbers of adult campers at the VHB is 11,257. This can be translated into a loss to the community of \$123,827.

Immediately prior to Easter 2020, WA's Covid lockdown closed the ██████████ until December 2020. A futile stop start management routine for the ██████████ was attempted until re-closure after January 2022. Currently, ██████████ is taking bookings for a September 2023. After that, the routine dawn surveying of the VHB will re-continue.

MANAGING NON-CARAVAN PARK CAMPING

Since the 1990's attitudes to the caravan park industry have been changing with exponential rapidity & the increase of non-caravan park camping has been associated with this rapid change. The Caravan & Motor Home Club of Australia (CMCA) was initiated & the tourist guidebooks of supposed free camping sites began to be circulated (██████████ 2013). These books provide a basis of the promotion of RV's that camping can be free & can be anywhere. The selling point is that if campers stay free in a locality they will spend money in that locality. However, this is contested by Brighthouse & Starfish Business Solutions (2012). Almost all campers at the VHB are from outside of WA (National & international). This refutes the RVM that WA is unfriendly to campers.

Any Local Authority Regime can be tenuous when dealing with such matters as Camping. Any equivocation re non-caravan park camping obviously could compromise an investment in a caravan park.

It can be expected that DS's caravan parks & the overflow camping facility at Mclean park could absorb an unexpected increase in camper numbers or, if non-caravan park camping were suddenly eliminated.

After catastrophic WA wildfire events between Northcliffe & Walpole, Kent River & Pemberton during February 2015 & over the western end of DS during 2022. Highway-access was closed for several weeks between Manjimup & Walpole. Wildfires are usually caused by people (campers & locals). The costs of these wildfire events no matter how infrequent surpass any benefit whether social, ecological, political or economical that can be attributed to free non-caravan park camping. Without collateral damage, the direct cost of extinguishing the Northcliffe wildfire during February 2015 was estimated at \$14,1 million (ABQ South West Radio News, 2015).

It follows that JG's recording of camper-use of the VHB during non-enforcement & during enforcement demonstrates that campers place a low value on free/cheap camping sites, from luxury 5 wheelers to standard tradesman vans, This was evidenced at the VHB by unattended campfires during high bushfire hazard periods for the initial period of 65 dawnns of non-enforcement of "No Camping", The fireplaces were eventually removed early in 2012. But this did not completely eradicate

Noted. The Shire aims to promote compliance with relevant legislation which would provide a level playing field for all businesses.

McLean Park is no longer operating as an overflow camping facility due to conflicts with other uses of the site.

Noted, as above Shire officers concur that unmanaged fires are of significant concern.

Further to this, the assessment of all new caravan parks and camping grounds will be required to consider *State Planning Policy 3.7* and the *Guidelines for Planning in Bushfire Prone Areas* to assess and address bushfire risk.

		<p>illegal camp fires.</p> <p>CONCLUSIONS</p> <p>Since the 1960's caravan park goodwill has been compromised. An image has developed that caravan park operators are profiteers when in fact the caravan parks of southern Manjimup Shire & western Denmark Shire are in active economic competition in their provision of an essential service. The sizes of these parks are of 40 sites upwards. Size is likely the reason, why smaller Parks are economically unviable and thus cannot sustain the required standard of service. Apart from "ad hoc" selection, campers now appear to choose a caravan park for camping only by two principal factors i.e, the park's location & the prices charged. If prices are low enough, some campers will insulate themselves against the impact on their camping environment without empathy of their surroundings.</p> <p>REFERENCES</p> <p>Brighthouse [REDACTED] & Starfish Business Solutions [REDACTED] [2012]): A Strategic Approach to Caravan & Camping Tourism in Western Australia. Prepared for Tourism WA.</p> <p>[REDACTED] (1990). Distribution of Waterbird Broods Relative to Wetland Salinity & pH in South western Australia. <i>Aust. Wildl. Res.</i> 17, 219-229.</p> <p>[REDACTED] (2014). Submission in response to Consultation Paper - Proposal for New Caravan & Camping Ground Legislation (WA Depts of Local Govt & Regional Dev, 2014) including a general response to all questions & a specific response to 12.9 Stopping on the Road, page 46: 28-08-2014 Submission49 [Secured].</p> <p>Western Australian Caravan Parks & Camping Grounds Act (1995) & Regulations (1997).</p>	<p>Models of caravan park enterprises have and will continue to change in response to varied influences. The Shire aims to provide clarity on approval and infrastructure requirements that retain flexibility for landowners to establish legitimate businesses where health, safety and environmental concerns can be appropriately addressed.</p>
15	[REDACTED]	<p>Thank you for the opportunity to provide comment on the Draft Local Planning Policy No. 51: Caravan Parks & Camping Grounds. Camping has changed across Australia, with many potential benefits for visitors, property owners and regional communities seeking to capture tourism expenditure.</p>	

	<p>Hipcamp is the world’s largest provider of unique outdoor stays and has helped over seven million people worldwide to get outside and enjoy a night under the stars. In Australia, almost half a million people have spent a night outside and there are over 1 million acres of land available to book using Hipcamp.</p> <p>Western Australia is among the fastest growing regions for new Hipcamp Hosts in Australia and continues to see strong demand from campers seeking new places to stay outside.</p> <p>Adventure tourism is the fastest growing sector of the tourism industry. Post-COVID, people are looking to explore wide-open spaces and camp with friends and families close to nature. Caravan and recreational vehicle sales have reached record highs, with many capable of off-grid travel.</p> <p>These trends are driving demand for new outdoor accommodation options, such as private land camping, provided through Hipcamp. This new style of camping is a form of adventure tourism where the natural environment is the hero and visitors share a commitment to ‘leave no trace’.</p> <p>Hipcamp’s Host and camper standards address issues of safety, noise, and waste management. We monitor Host and camper behaviour, including through reviews and feedback, and take action when required. Hipcamp operates a 7-day-a-week support hotline for campers, Hosts, and members of the community.</p> <p>Hipcamp actively works with state and local governments to understand the changing nature of camping and collaborate on initiatives to realise the available benefits. We are grateful for the opportunity to comment on the Draft Local Planning Policy No. 51: Caravan Parks & Camping Grounds, and offer the following feedback:</p> <ol style="list-style-type: none"> 1. Consider higher site and stay limits It is recommended that up to 8 sites per property be supported within the Rural Zone generally to provide property owners greater access to the opportunity to welcome visitors. It is unlikely that all sites would be 	<p>Trends toward nature-based camping and recreating are noted and the proposed policy aims to provide clarity on legitimate pathways to establish accommodation businesses in this realm.</p> <p>Noted. To assist proponents and provide consistency Shire officers will prepare a template for a guest code of conduct that includes relevant considerations (similar to the approach that the Shire currently supports for holiday homes). It is noted that not all operators utilise a single booking system, nor does the Shire have any control should a booking manager change their own terms and conditions.</p> <p>Not supported. The proposed policy includes a standard for a maximum of 4 sites on any one lot within the Rural Zone generally, and greater than 4 sites within designated Tourism Precincts in the Local Planning Strategy. This has been proposed</p>
--	---	--

	<p>occupied at once, or that all campers would be staying in caravans. Alternative measures such as management practices, like the 'request to book' function offered through Hipcamp, could be used to limit the number of caravans camping at the same time.</p> <p>Clarification should also be given in relation to the size of the property in question. For example, very large properties may be able to accommodate more sites than smaller properties. Limiting sites per hectare may be a more effective approach. It would be unfortunate if very large properties, with various suitable locations capable of accommodating campers, were limited to offering only 4 sites.</p> <p>2. Offer flexibility to achieve outcomes It is recommended that further flexibility be offered when deciding the minimum levels of service provided at a nature based park. For example, the requirement to provide 10,000 litres of water per site (where reticulated water is not available), may be unnecessary for today's off-grid campers. Off-grid or self-contained campers have the equipment and knowledge to effectively manage their water needs.</p> <p>Requirements for rubbish collection may also be unnecessary where campers acknowledge 'leave no trace' principles and their behaviour is actively monitored by the Host. Requirements to install a dump point or enter a license agreement for campers to use a public dump point may be cost-prohibitive for property owners hoping to welcome guests. Public dump points are generally installed to support and encourage caravan owners to visit a destination. Seeking to pass this cost onto nature based parks may be counterproductive to this objective.</p> <p>It is also recommended that the length of stay limit of 3 nights for nature based parks be reconsidered. Acknowledging that this limit may be higher where particular amenities are provided, some self-contained campers have the capability to remain off-grid for up to 5 or more nights.</p>	<p>to support the establishment of small scale and low-key proposals, with the aim of minimising potential impacts on the environment and neighbouring landowners, preserving rural and agricultural land uses as predominant in this zone, and minimising increases to traffic and road maintenance. This also aims to encourage tourism in strategic locations with appropriate access and infrastructure, and provides guidance for where tourism will be supported as the predominant land use within the Rural Zone. Determining the number of sites based on lot size does not adequately address these considerations.</p> <p>The proposed policy aims to provide clarity for landowners wishing to establish a legitimate business. The minimum service standards for nature based parks that are established in the proposed policy reflect a significant reduction compared to other types of parks; however, this necessarily come with limits to the extent that a park may operate. Self-contained caravans and RVs require eventual servicing and it is considered appropriate that hosting businesses provide these services rather than pass the responsibility and costs of doing so onto the Shire's ratepayers.</p> <p>In preparing the proposed policy Shire officers considered the requirements of the Caravan Park Regulations and guidance prepared by the State Government in support. A limit on the length of stay for nature based parks is considered appropriate in circumstances where a limited range of services and infrastructure is provided. Where an operator seeks to offer a longer length of stay they may increase the available services and apply for an alternative license type in accordance with the Regulations.</p>
--	---	---

		<p>3. Streamline the application process and minimise costs It is recommended that the Shire support implementation of the new policy by providing templates and assisting property owners to navigate the approval process. The cost of seeking approval can be a barrier for property owners considering welcoming visitors. The application process should be proportional to the potential scale of camping being proposed.</p> <p>Hipcamp believes in the power of outdoor recreation to deliver social, environmental and economic benefits for people and communities. We welcome the Shire's work to enable new outdoor accommodation options and look forward to helping property owners, campers, and the community to realise the available benefits.</p>	<p>Agreed. The intent of the proposed policy is to provide greater clarity and certainty for both landowners and neighbours. The Shire is proposing to improve information materials and develop a template guest code of conduct to better enable landowners to make application (and ultimately manage their businesses without concern).</p>
--	--	--	---

Did you know?

In 2019, 160,000 people made day trips to the Shire of Denmark and another 167,000 people made overnight visits, staying a total of 591,000 nights.



NEED MORE INFORMATION?

Head to denmark.wa.gov.au

- Send us an enquiry
- Lodge your application (planning approval or building permit)
- Find policies and guidelines

Contact our Planning team

- enquiries@denmark.wa.gov.au
- (08) 9848 0300
- 953 South Coast Highway
(9am-4pm Mon-Fri)



CARAVAN PARKS



Do I need approval to have campers or caravans stay on my property?

You will need Shire approval if you want to have visiting campers or caravans pay to stay at your property. This includes:

- Planning approval for a 'Caravan Park'
- Granting of a licence to operate a Caravan Park
- Building permits for any structures

A Caravan Park can only be approved on land in the Rural or Tourist zones.

What about family and friends?

Family and friends can camp at your property without needing Shire approval if they:

- Use one (1) caravan only
- Stay no more than 3 nights in any 28 consecutive days
- Do not cause any nuisance or disturbance

Please make a request in writing if you would like family and friends to stay with more than one caravan or for longer than 3 nights.

What are the standard requirements for Caravan Parks?

The minimum requirements for facilities and infrastructure depends on the type and size of the Caravan Park you are proposing, as outlined in the *Caravan Parks and Camping Grounds Regulations 1997*.

If your property is within a designated 'bushfire prone area' you will need to address the *Guidelines for Planning in Bushfire Prone Areas*. Seeking early advice from an accredited bushfire consultant is recommended.

Standard requirements in the Shire's *Draft Local Planning Policy 51: Caravan Parks & Camping Grounds* include:

- Maximum 4 caravan/camping sites within the Rural Zone or fronting an unsealed road
- Maximum 20 sites within a Tourism Precinct, over 20 sites in the Tourism Zone
- Minimum 50m setback from all boundaries
- Minimum service levels and maximum length of stay in nature based parks
- Must have a resident caretaker on site
- Preparation of a management plan (see policy for details to be included)

If my neighbour wants to start a caravan park or camping ground will I be consulted?

We encourage everyone to talk to their neighbours as early and as much as possible when making development decisions. Conversation helps to build relationships and to share information.

When we receive an application for a caravan park or camping ground we will invite comment from neighbours, providing the opportunity for relevant issues to be raised and addressed.

