



The Caravan Parks
Association of SA

PO Box 39, Seacliff Park,
South Australia 5049

Phone: (08) 8363 7255

www.sa-parks.com.au
Email: admin@sa-parks.com.au

To: SA Productivity Commission
Re: Tourism Regulation Review 2021

Further to our meeting via Zoom on 11th May I wish to confirm in writing some general issues with the development and regulation in Caravan Parks in SA. Due to short time frames to prepare input into this submission I am providing general feedback to the review panel, with a view to seeking further input from members during the later consultation periods of the Review.

The Caravan Park industry provides in excess of \$23billion in economic impact to the Australian economy annually. On average person's staying in commercial caravan parks will stay 4.6 nights and spend \$905 per trip. (source Tourism Research Australia 2020). In South Australia there are over 5 million visitor nights spent caravan & camping, and the caravan park industry is experiencing strong growth (apart from a temporary downturn during the height of the COVID 19 lockdowns in SA).

The strong year on year performance is also reflected in the latest accommodation occupancies for April which show Cabin accommodation occupancies in South Australia at over 70%, and the highest of any state. (source Caravan Industry Australia).

The strong consumer demand for caravan park experiences is leading to the development of more facilities and infrastructure in caravan parks. Consumer demand has given confidence to the sector to invest to improve the offering within their businesses. Many Caravan Parks are much more than simply sites for caravans and campers, they have improvements which now include varying ranges of cabin and villa accommodation, playgrounds, jumping pillows, swimming pools, water parks, camp kitchens etc.

In order to undertake park expansions or infrastructure developments there may be a range of approvals required. These could include planning approvals for Traffic, Wastewater, Native Vegetation, Native Title, Electrical Infrastructure upgrades, and in some cases rezoning. All these planning approvals need to be in place before parks can seek Development Approvals and Building Approvals. These approvals may require the park to appointment of an array of specialist consultants to deal with the range of issues. At present government departments appear to want to deal with consultants rather than individual operators, however the appointment of consultants can be costly for smaller operators.

Generally, it is felt that government departments are not set up to adequately deal with the small to medium sized business person who needs assistance with planning and development approvals .

It would be helpful to have some sort of single point of contact/officer for smaller tourism operators to get government assistance with the myriad of approvals they need to undertake a development. This person would need to come from the point of wanting to serve small business and assist to facilitate their development. I.e. to help them cut through the red tape.

Rezoning to expand or build new parks

Caravan Parks that need to acquire land in order to expand or build new parks have experienced lengthy timeframes in order to get land rezoned for use as a caravan or residential park. This can delay developments and increase costs significantly and is a deterrent to the development and expansion of parks.

Crown Land

A number of caravan parks are located partially on Crown Land (the majority under the care & control of Councils). While this does not present an issue for most parks, it has historically caused some impediments to finance, as the Crown Land Act states the Minister can reclaim the land at any time. It can be a deterrent for banks to loan to businesses that are located on crown land.

If a caravan park wishes to invest heavily in new accommodation & infrastructure, they need the security of either, freehold ownership, or a long-term lease. Recent changes to the local government act have provided the ability for councils that own parks to offer longer term leases, and this is helping to increase capital investment into some parks that have been able to secure longer lease terms.

However, in some cases, a park (or council) may wish to acquire some crown land in order to secure the land before investing heavily into the business infrastructure. The acquisition of Crown Land can be a lengthy and frustrating process.

Dept of Infrastructure & Transport

If a park is redeveloping and wishes to change entries onto Departmental roads it can be a costly process to get approvals. Traffic surveys must be undertaken, and specialist Departmental approved consultants must be appointed and paid for by the business operator. These consultants can be expensive.

Tourism Signage

Signage on local government roads appear to be a relatively easy process, however if a business wants signage on a Dept Of Infrastructure & Transport it is more complex. The application process needs to be simplified and consideration to more signage of roads of over 80km would be helpful to business.

Expansion that requires Wastewater upgrades

In regional areas caravan parks that are connected to Community Wastewater Management Systems may face costly charges if developments lead to the need for them to increase their capacity into the system.

Fire Safety Requirements in Caravan Parks

Caravan Parks are covered in the Ministerial Building Standard MBS003 and the Ministers Specification 76A Fire Safety Requirements in Caravan & Residential Parks. While we have no issue with the requirements of these regulations and specifications there is inconsistent interpretation of the requirements.

The management of compliance falls on local government authorities via their fire safety committees. At present there is a great deal of variation between local governments as to how their committees discharge their obligations. While SA Parks have received correspondence from the Minister to state that compliance is not retrospective, there are fire safety committees that have been seeking retrospective compliance from parks. We have some members who operate more than one park in different local government zones with greatly different obligations imposed on them.

SA Parks have sought support from the Department to disseminate guidelines to local government as to the general parameters that fires safety committees must work within, in an effort to get some state consistency on this. At this time, we are unaware whether any such guidelines have been created.

Further input

As stated previously due to tight time frames the issues raised above may not be comprehensive of the range of issues felt by caravan parks in SA. We would like to seek further input from our 145 members during the Review process and to provide further input should we determine other issues not raised within this submission.

We would also like to receive copies of any Draft Reports in order to provide further feedback and comment.

On behalf of the Caravan Park sector, I thank you for the opportunity of input into the review.

Yours faithfully,

A handwritten signature in black ink that reads "Fiona Williams". The signature is written in a cursive, flowing style.

Fiona Williams
General Manager
17th May 2021