



SUBMISSIONS TO THE JOINT PARLIAMENTARY ECONOMIC
DEVELOPMENT COMMITTEE

Subject - Grey Tourism

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Caravan Parks Association of Queensland Inc.

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TABLE OF CONTENTS

Topic	Page
INTRODUCTION	4
REGULATION OF THE CARAVAN AND TOURIST PARK INDUSTRY IN QUEENSLAND – EFFECT ON GREY TOURISTS	6
APPRECIATION OF GREY TOURISM	9
PROMOTION OF THE CARAVAN AND TOURIST PARK INDUSTRY IN QUEENSLAND	13
RATE OF DECLINE OF CARAVAN AND TOURIST PARKS IN QUEENSLAND	16
THREATS TO FUTURE VIABILITY OF CARAVAN PARK INDUSTRY = THREAT TO GREY TOURIST INDUSTRY	19
GREY TOURISTS IN QUEENSLAND – POTENTIAL VICTIMS OF INADEQUATE LAWS	23
RECREATIONAL VEHICLE CLUBS – LOBBYING OF GOVERNMENTS	25
WHAT SHOULD BE DONE TO ENHANCE “GREY TOURISM” IN QUEENSLAND	30
LIST OF ATTACHMENTS	31

1. INTRODUCTION

2. The Caravan Parks Association of Queensland Inc (CPAQ) is the industry body representing the values of park operators in Queensland. Caravan Parks not only provide a destination, they also represent the core of tourism through lifestyle, affordability local knowledge and choice.
3. Our values of sustainability, choice, road safety, education and innovation create the cornerstone of the caravanning experience which we promote throughout Queensland by encouraging users to explore with confidence our member's facilities.
4. The Caravan Parks Association of Queensland Inc. (CPAQ) represents about four hundred Association member parks. The Association is representative of in excess of 80% of the total number of sites in parks throughout Queensland and is affiliated with the Industry's national body.
5. CPAQ, as one of the leaders in the tourism industry in Queensland, welcomes the opportunity to put before the Honourable members of this Committee various items of information including historical issues, trends, and the capacity of the industry generally to accommodate grey tourism needs.
6. CPAQ will highlight the challenges and problems which currently face the industry. Without doing so, it is impossible to talk about any class of tourism in particular. Nor is it possible for anyone or any body to plan for the future unless existing barriers and problems are addressed in a constructive and collaborative manner.
7. Whilst the contents of this submission might seem somewhat provocative in various parts, it is the submission of CPAQ that unless these various points are made to Government right now, then it is pointless to talk about such issues as "grey tourism" because it will be quite irrelevant if the infrastructure is not in place to address the needs of such road-based travellers.
8. CPAQ welcomes the opportunity to present information to this Committee to show that unless there are quite significant shifts in Government policies, then the future for the Caravan Park Industry in Queensland is under serious threat. If the future of the Parks Industry in Queensland suffers any degree of detriment, then the effect on "grey tourism" will be proportionately linked to that detriment.
9. If that situation is allowed to continue, then tourism in Queensland will be the first victim. The domino effect of such a chain of events would be catastrophic for the Queensland economy when put in the

perspective of lost tourism, lost employment, lost business development opportunity and loss of a complete industry key player. To put that further into perspective, Queensland currently stands a real risk of loss of about 24% of total capacity to accommodate the travel needs of Australian road travellers (including grey tourists) in this State unless changes are made quickly.

10. This is not an emotive statement; this is fact. One of the biggest losses will be the "grey tourist" visitor to Queensland because we will have totally lost the capacity to service their needs. This process has already started and it needs to be stopped!
11. It serves no purpose to talk about grey tourists unless we can accommodate them within Queensland. The fact is that when the grey tourists flock into Queensland each year, the overwhelming majority choose to stay in our member parks across Queensland.
12. For that reason, when we talk about grey tourists, we have to also talk about their destinations, and the big destinations for grey tourists generally are their caravan or tourist park of choice in any given part of the State.
13. For the purpose of this paper, the subject "Grey Tourism" will be restricted to the class of "grey tourists who choose to travel by road".

14. REGULATION OF THE CARAVAN AND TOURIST PARK INDUSTRY IN QUEENSLAND – EFFECT ON GREY TOURISTS

15. By far one of the greatest obstacles to the caravan and tourist park industry throughout Queensland is the fact that the industry is regulated by Local Government.
16. In simple terms, Local Governments are responsible for the licensing and regulation of commercial caravan and tourist parks. Unfortunately, this means that there are virtually 74 different ways to regulate the industry throughout Queensland.
17. There are various management companies and park chains which operate multiple park operations throughout the State and one of the greatest obstacles faced by these owners is the fact that not all Local Authorities are the same when it comes to requirements to operate and license commercial parks.
18. What one park chain operator might experience (in terms of Local Government requirements) in one part of Queensland might be totally at odds with what they might experience in another part of the State and in another Local Government jurisdiction. As far as we are aware, this is the only State in Australia where this situation exists.
19. The situation is even worse when one considers that Local Governments are not even obliged to adopt the model local laws as held by the Department of Local Government.
20. If there is such an uneven approach to regulation of the caravan and tourist park industry throughout Queensland, then this can only result in a very ad hoc approach to caravan and tourist park facilities that the grey tourist is going to encounter; hardly the approach of a State that is concerned about attracting grey tourists (or any class of tourists) to the State to spend their tourist dollars.
21. The other unfortunate downside to the regulation of the caravan and tourist park industry across Queensland is the fact that many Local Governments are not prepared to abide by the requirements of State Statute Law. A classic example of this is the issue of their responsibilities as Trustees of Reserves.
22. Some Local Governments are using Reserve parcels of land to operate "unregistered and unlicensed" caravan and camping facilities in direct competition with local commercial parks which those Councils themselves are responsible for licensing and issuing permit to in order to conduct their business within that Local Government area.
23. Put simply, some Councils are causing direct detriment to their own local caravan and tourist park businesses because of their own

inappropriate activities when it comes to the use of Reserves. Others are turning a blind eye to illegal practices within their area of jurisdiction in circumstances where those practices are impacting directly upon local registered caravan and tourist parks.

24. In some cases, Local Governments have chosen to write their own Local Laws concerning the governance of commercial caravan and tourist parks quite obviously in order to skirt around the requirements of such issues as conditional freehold of tracts of land.
25. The Local Governments who are engaged in this type of activity are the same Local Governments who are responsible for the regulation of the bona fide commercial park operations within their area.
26. This situation is further made worse by the fact that Departments within the Queensland Government are aware of this practice by Local Governments and are either unwilling, unable or reluctant to do anything about it and ensure that Local Governments adhere to State Law.
27. Then there are the actions of various State Government Departments themselves who choose to make use of various parcels of lands which is Crown land or land owned by the State. In some cases, this land is vested in the management of government Departments which then choose to use it for commercial caravan park and camping purposes in direct competition with local commercial caravan and tourist parks.
28. It is the opinion of Caravanning Queensland that for the State Government to engage in this type of behavior is nothing short of improper. It has become quite obvious to this Association that in recent years, some within State Government have awoken to the fact that they can get away with operating a business on Crown land in direct competition with local established commercial caravan and tourist parks with quite a level of commercial advantage.
29. Firstly, Government Departments are removed from many of the everyday costs of owning and operating such a parcel of land for commercial purposes. Secondly (and this is of critical importance), any commercial business that a State Government Department might choose to operate on Crown Land and which would normally be subject to licensing and registration by Local Government does not have to be subjected to the standards, licensing, registration and regulation as it would if it were located on non-Crown Land.
30. In other words, Local Government jurisdiction does not extend to Crown Land and the normal requirements of Local Government do not apply to undertakings on land which is controlled by the State.
31. Such parcels of State controlled land where these practices are occurring are commonly referred to by Local Governments as "un-

rateable land". This is their terminology meaning that it is controlled by State Government and they have no jurisdiction there. All of these various issues compound to make the job of our Association in catering for the needs of "grey tourists" harder than what it should be. Grey tourism is the ultimate victim.

32. APPRECIATION OF GREY TOURISM

33. In order to talk about grey tourism, one must understand and identify that group which comprises "grey tourism". This is important mainly because there are private user groups in the community such as the Campervan and Motorhome Club of Australia (CMCA) which are actively involved in lobbying Government at all levels, particularly Local Governments, in order to secure as many facilities and benefits for their members at the lowest possible cost. "Free" comes to mind. (This issue will be addressed elsewhere).
34. "Grey tourists" are essentially road travelling tourists who comprise an age group which might be considered to fall within the "grey hair" range. This is an unfortunate title that has evolved in recent years and can bring some degree of insult if used to the wrong person.
35. What has to be said is that the notion of "grey tourists" has changed somewhat in terms of demography of age bracket. Where it could have been said that the majority of this group fall within the 65 year plus bracket, the truth is that this age group has tended to move backwards and might now be better described as falling within the 55 to 65 year age bracket. This statement is based on industry research by our national body (Caravan and Recreational Vehicle Association of Australia –CRVA). Copies of their research data are attached for information.
36. User groups such as the Campervan and Motorhome Club of Australia which represents only about 10% of RV users in Australia, are constantly lobbying Governments at all levels for benefits for their members. They tend to project the image (whether intentionally or otherwise) of grey tourists as being on the road "for a great amount of time".
37. The reality is that not all "grey tourists" are on the road for large blocks of time. There are various categories that could be used to describe several of the user patterns and some of them might be classed as follows....
38. Semi full-time and full-time.....Those who have left the permanent workforce, whether through retirement or health or other reasons and who choose to take to the road to "live the dream and find the freedom".
39. Time-poor transitional road travellers.....Those who might be workers still engaged in their occupation or profession and who could be described as time-poor and who strive to get out on the road at every opportunity, albeit with the constraint of not having enough time. This group can include retirees who, by personal choice, still have family ties and elect to travel in short bursts for convenience.

40. Seasonal grey tourists.....These are the people, mainly retirees, who reside in other States of Australia and elect to migrate to Queensland in the winter months to enjoy our climate that is not available to them in their home state.
41. This group of tourists tend to have fairly set and predictable patterns and many even have permanent annual bookings within our member parks. It is this group who actively take up membership of our Queensland communities and live and spend their dollars as would locals whilst they are in town. It is this category of "grey tourists" who remain largely unidentified as a user-group and who are critical in terms of tourism to Queensland.
42. Unfortunately, Governments are used to quite aggressive lobbying by the user groups for benefits for their members and it is not always the case that the right message is being received by Governments as far as road tourism is concerned. In some cases (best known to themselves), Local Governments have become champions of the RV lobby group.
43. Tourism Queensland does little for the road tourism market including the caravanning market. It could be argued that they have little appreciation for the various examples of road tourists as have been described above.
44. Recently they offered to produce some backdrops for our self-funded caravan show stands around Australia this year.
45. When the proofs of the artwork were received, a large proportion of the pictures featured water and none featured families or mature travellers. All pictures featured young couples.
46. When asked to change some of the pictures to better reflect the whole market they came back with the only one picture featuring a family and none with mature age people, evidently because their photo library does not have a suitable picture available.
47. Our Association believes that Tourism Queensland places an over-emphasis on overseas tourists and tourism packages and virtually misses the road travel tourist, including grey tourists. There needs to be much more study done in relation to the road tourism sector of the industry.
48. We believe that this is a shame, given the fact that road travelling tourists (grey tourists) might spend less but spend more time on the road. This issue is, in our opinion, not understood. Other Government Agencies including EPA and DERM seem oblivious to the issues that surround grey tourism and the needs of the industry generally.

49. TRAVEL PATTERNS

50. Generally, grey tourists travel the northern parts of Australia in the cooler months. Hence, in Queensland, the trend is for the peak tourist season (for road travelling tourists) to be mainly during the cooler winter months.
51. There are various reasons for this; firstly, a large number of interstate grey tourists come to Queensland from the southern states with the aim of escaping from their colder winter period. Secondly, many grey tourists see the Queensland winter season as the best time of the year to visit here, simply because of the climate and their ability to wander north without the extremes of our summer heat and humidity.
52. Thirdly, apart from the heat and humidity that grey tourists would encounter in tropical North Queensland in the summer months, they would also be living and travelling in recreational vehicles in the height of the wet season and the cyclone season.
53. Up until last year, there was another great incentive for them to travel to Queensland generally and that was simply because of the cost of fuel. When the fuel subsidy existed in Queensland, many grey tourists looked forward to crossing the border in Queensland simply because their travel costs would then drop by about 8 cents per litre.
54. This might not sound like much, but it adds up when you start towing a caravan for thousands of kilometres. When grey tourists tow caravans, they are more conscious of the cost of fuel and their driving habits.
55. The reality of the situation with the fuel issue is simply this; there is very little effect on the travel costs for a grey tourist when one looks at their journey from the southern states to the top of Queensland and the actual dollars involved. Unfortunately, this is not the perception of the grey tourists from interstate.
56. Again, it has been left to our Association and our counterparts interstate to repair the damage caused by the change in direction of Government Policy.
57. When the influx of grey tourists (and road travelling tourists generally) peaks in Queensland in winter, our member parks can be quite busy with numbers. It is generally at times like this when user groups such as the RV Club lobbyists start their annual public campaign about insufficient sites for their large rigs and increase the intensity of their lobbying to Government for more free camping facilities.

58. This regular pattern by such user groups is quite predictable. Unfortunately the same people responsible for such campaigns are the ones who quite openly state their dislike for the nature of caravan and tourist parks. More will be said about this elsewhere.
59. Our Association is quite aware of the seasonal issues in Queensland and openly encourages members to discount off-peak rates where they can. We also encourage the public, including grey tourists, to travel in the shoulder seasons or at least to consider such a strategy.
60. It is at these times that the road conditions are better, the seasonal highway traffic is not as intense, and the chances of securing accommodation at their preferred destinations are enhanced.
61. Put simply, it is the non-peak period of the year that can make or break our Association members.
62. In spite of the fact that Governments at all level continue to be bombarded by the RV Club lobbyists, the fact is that the annual occupancy rate for our member parks across Queensland is approximately 44%. The approx. Annual occupancy rate across Australia is about 50%.
63. Our Association is not aware of any member park within Queensland that enjoys a 100% occupancy rate.
64. The relevance of the above numbers is that at the present time, there is no shortage of available sites for the "grey tourists" who wish to stay at our member parks. It is generally the ones who elect not to use parks that are the ones who are the most vocal and it is they who strive to get the attention and favour of Government for their own purposes.

**65. PROMOTION OF THE CARAVAN AND TOURIST PARK INDUSTRY
IN QUEENSLAND**

**66. (To promote the caravan and tourist park industry in Queensland
is to promote “grey tourism”)!)**

67. CARAVAN PARKS DIRECTORY (QUEENSLAND)

68. Each year our Association produces a Caravan Park Directory for the whole of our membership throughout Queensland. This is also a vehicle for promotion of all allied industry as well as the Caravan Trade and Industry Association of Queensland. This Directory is also invaluable as a Queensland promotional tool in all other States and Territories of Australia.

69. Last year there were 230,000 directories printed and distributed Australia-wide. Distribution was by way of direct handout at all the main Caravan and Camping Shows, mail out is (free) to all requesting individuals and delivery by road transport to all regular outlets.

70. Our parks directory is sent to all Tourist Information Centres across Queensland for free handout. Our Association bears the cost of preparation of the Caravan Parks Directory and it is a free publication. In our opinion (and also from what we continue to be told) it is the best such publication in Australia.

71. In 2010, we have increased our print order by 30,000 to 260,000. This is due to the ever increasing demand for the publication.

72. Historically, the numbers of Directories that we print are insufficient to respond to the number of requests that we receive, particularly from the likes of Tourist Information Centres.

73. Our internal surveys tell us that our Directory is right at the top when it comes to promotion of the road travel tourism sector. The people who are travelling and using our parks are certainly using the publication. This feedback is common from all sources.

74. BRISBANE CARAVAN AND CAMPING SHOW

75. Each year there is a series of caravan and camping shows which are held in Melbourne, Adelaide, Perth, Sydney and Brisbane. There are many other smaller shows and promotions but these are the big shows and it is at these shows that the promotion of touring by road in Queensland is promoted by this Industry.

76. For eight of the last ten years, the Caravan and Camping show in Brisbane has attracted in excess of 70,000 visitors. In terms of the number of exhibitors and the area of the show, it makes the Brisbane Caravan and Camping Show the largest show on the Australia-wide circuit.
77. The Brisbane Show is held in June of each year at the RNA and is timed to correspond with the long weekend within that month. Although accurate numbers are unavailable, it is confidently estimated that over half our gate attendance are patrons who would qualify to be included in the "grey tourist" age bracket. The Brisbane Caravan and Camping Show is the second largest regular staged event in Queensland each year, second only to the RNA in terms of attendance.
78. It is the experience of our Association that the majority of people who attend the Caravan and Camping Show in Brisbane, have a predisposition towards the notion of caravanning and touring. The nature of the show is that it is a one-stop-shop and is aimed squarely at the consumer market, both real and potential.
79. It is quite common knowledge that many "grey tourists" time their trip north to Queensland so that they can take in the Brisbane Caravan and Camping Show in their travels.
80. Although the fact that over half the attendance at the Brisbane show is by "grey tourists" or budding "grey tourists", there is another very important issue that should be mentioned. It is something that not many outside the Association realise and it is this; there is an emerging trend by younger generations to start off in the camper-trailer range of recreational vehicle (RV) as a first investment. This is particularly so with younger couples who might have children.
81. Once the "first-up" users of camper trailers have encountered the "experience" of owning their own RV, then they tend to progressively upgrade their style of RV through the range including caravans, motor homes etc . It is this trend that is not appreciated by many and it is this trend which could justifiably be tagged as trending towards "grey tourism" status, particularly so after the children have grown and have "flown the nest" and at a time when couples are about to promote and re-invent their lives and their new freedom.
82. This is the essence of growth and promotion of the "grey tourist" phenomena in Queensland. Not only does our Association market and operate the Brisbane show, it also operates a presence at all the other shows throughout Australia and in that sense is the roving tourism ambassador for "grey tourism" to Queensland.
83. At our Brisbane Caravan and Camping Show each year in June, over 10,000 copies of the parks directory are handed out to members of the public. In marketing terms, it is a generally accepted fact that if you can

secure a take-away rate of 3% by attendees of promotional material such as the directory then you are doing very well. At the Brisbane show, we achieve about 12-14%. This considered extremely high from a marketing perspective.

84. It is somewhat annoying that entities such as Queensland Events Corporation go and direct funds at all sorts of events that bring in nowhere near the income or promotional value of the Brisbane Caravan and Camping show.
85. This is particularly relevant when it is realised that over 50 % of the attendees of the Brisbane show come from outside Brisbane and seek accommodation in Brisbane and also spend tourist dollars here.
86. Our Association does not seek funds in relation to the conduct of the Brisbane Caravan and Camping Show. However, it would be very grateful if it was even recognised that we were putting on the biggest show in Queensland, outside of the Brisbane Exhibition.
87. We would also push the point that there is a qualified market out there and that we have been addressing that market for quite a considerable time.
88. Additionally, we are continuing to grow the market and to provide a network whereby younger families can still use the facilities they need when starting off in the lifestyle. It is this issue that is too easily overlooked. It is the pre-cursor to "grey tourism" and is part of the whole package of the road travelling tourist industry.

89. RATE OF DECLINE OF CARAVAN AND TOURIST PARKS IN QUEENSLAND

90. Although exact numbers are unavailable, it is estimated by Caravanning Queensland that in the past ten years, up to fifty caravan parks have disappeared from the market. This has certainly reduced the capacity of our Association members to service the needs of the grey tourist.

91. One of the main reasons for this decline has been the continuing rate of increase of Government charges across the board. It is these charges that have continued to increase the pressure on park operators to sell their businesses to developers, mainly for the land value attributed to the park property.

92. Our Association predicts that the rate of decline in the number of caravan and tourist parks across Queensland is about to rise dramatically. We predict that the demise of these parks will be mainly in rural areas and coastal areas where parks are not serviced by town sewage and where the full impact of the ERA license fees is now starting to bite.

93. Road travelling tourists will not go to destinations where they cannot secure the services that they require.

94. At the present time, the Caravan Industry is selling approximately 18,000 caravans per year throughout Australia. Approximately 75% of those sales are estimated to be to "grey tourists."

95. With the exception of the downturn in the past eighteen or so months, there has been a trend of about 1,500 motor homes sold throughout Australia per year. It is estimated that about 90% of those sales of motor homes would be to "grey tourists."

96. Generally, the Motorhome market is less than 10% of overall sales of all RV's in Australia and that trend is fairly consistent.

97. It is plainly obvious that the current decline in park numbers must be stopped and then reversed. It is also plainly obvious that Queensland will need more parks to cater for the current growth trends in the "Grey Tourism" market.

98. Our Industry would like to see an inquiry in relation to the use of Government land, similar to what has occurred in New South Wales.

99. If some Government land could be released for Caravan and Tourist park development, this would go a long way towards solving some of the problems surrounding the decline in the number of parks currently facing the industry in Queensland.

100. If this were to happen, then it would have to be made available at realistic rates because of the investment of funds required to grow a park from the ground up. If a person is going to invest a large amount of money into the development of a park, then they must be sure that they are going to get a return for their investment in the long term otherwise the development will not occur.
101. In New South Wales, there are already in excess of 50% of caravan parks on Government land.
102. A year or so ago, New South Wales established a committee specifically to look at the issue of use of Government land for caravan park purposes. We believe that the committee has already travelled to the United States to investigate industry trends and their inquiries are on-going at this time.
103. New South Wales is also currently engaged in a program called "New Tourism Campaign to Promote Golden Age of Camping". The New South Wales Government has donated \$166,000 towards the cost of running the campaign in partnership with our sister organisation, the Caravan and Camping Industry Association NSW (CCIA).
104. Grey tourists do not only stay in caravan parks that are established on the beach. They will stay in caravan parks that are not on the beach but the parks have to be set up properly, they have to be environmentally sustainable, but more particularly, you must be able to ensure that operating costs are kept low enough to ensure a return on your investment.
105. At the present time, the cost of establishing a caravan park from the ground up is quite enormous, particularly in relation to issues such as head works etc. Development of more parks is being greatly inhibited by costs and it is time for both our industry and the State Government to have a broad look at this situation so that the future needs of the grey tourist can be met.
106. The two things needed to promote the growth of the caravan and tourist park industry in Queensland are realistic costs for expansion and development and secondly, inclusion of the industry within the promotion of tourism so that the market sector can grow. At the present time, the latter issue is on a piecemeal basis and that has to be changed.
107. The current size of the caravan and tourist park industry in Queensland is large enough at present to cater for current needs of grey tourists. This can not be said for the future, given the current rate of growth in the sector.

108. We know, from the number of inquiries received regularly, that there is no shortage of people who are interested in the development of new parks, but none of them come to fruition when the real cost issues are made known to them.

**109. THREATS TO FUTURE VIABILITY OF CARAVAN PARK
INDUSTRY = THREAT TO GREY TOURIST INDUSTRY**

110. There are various major threats to the viability of the Caravan Park Industry in Queensland. By far, the most serious of these threats and one which goes to the very heart of the ability of caravan park operators to provide a service to "grey tourists" lies in new increases in government charges.
111. If this threat continues, it will result in an inability by current park owners within the industry to continue with development and expansion plans of their business. This has already started to happen.
112. Another threat to the further development of caravan and tourist parks is the current south-east Queensland plan. The plan alone is responsible for the total stop of all development as it relates to Caravan and tourist parks. Large tracts of land are unavailable for developers wishing to expand within the Caravan and tourist park industry in areas covered by the south-east plan, in particular in the pink areas where land access is very limited.
113. This means that entrepreneurs or developers need to go outside the pink area with a view to obtaining land for further development purposes. There is a major problem because in a lot of cases such areas outside the pink zone are unable to be developed for Caravan and Tourist Park purposes so the mere presence of the plan defeats all possibility of further development within the industry.
114. This industry is aware of four operators on the Sunshine Coast alone who want to further develop Caravan parks within the Sunshine Coast area to further grow and develop the Caravan and tourist park industry to cater for tourism generally (including grey tourism) but they are unable to because of the limitations being placed upon them by the South-East Queensland plan.
115. Another serious threat to the viability of parks in Queensland by increase of Government charges relates to the new EPA (DERM) annual license fee charges.
116. The State Government last year increased annual license fees for environmentally Relevant Activities for most industries throughout Queensland effective January 1, 2009. There was no warning whatever of the new increased license fees.
117. Caravan and tourist parks which are not connected to town sewage systems and which have their own sewage treatment plants on site fell victim to the new license fees for such plants.

118. It is only now that the extent of damage from this impost can be realized simply because the licenses held by caravan and tourist park operators to operate sewage treatment plants within their parks do not have a common due date. In other words, it has taken about one year to estimate the damage to the industry that has been caused. Unfortunately for some, it is now too late.
119. On average throughout the parks industry in Queensland, parks in the above category found themselves subject of annual license fees increases of up to in excess of 2000%.
120. We recently conducted an internal State-wide survey of our member parks and can report that at present, it appears as though up to 40 caravan parks will either close, be sold as an on-going business, or be sold to developers for use of the land for development purposes other than for caravan park development.
121. Specifically, these parks are parks which have sewage treatment plants on site and which have incurred the new license fees, some in excess of 2000% A document containing a précis of some of the responses from those park operators is attached for information.
122. Obviously, for "commercial in confidence" considerations, park names have been excluded but general locations have been included and are identified by the Divisions that the Caravan Parks Association in Queensland uses to manage membership. (For further description of our Divisions, please refer to the code system used in the Caravan Parks Directory 2010).
123. If most of these parks fade out of the Industry, (as they have indicated they will) then all classes of road travelling tourists in Queensland (including grey tourists) will be directly affected by the extent of closures. It will also have a direct effect on a certain volume of low cost housing which is offered by some of these park operators to elderly residents under RTA Legislation.
124. As any of these parks get sold up, if a developer is involved, then that generally means the demise of the caravan park. One thing is certain, if a caravan park is replaced by a high-rise development, there will never come a time in the future when a developer will want to purchase that high-rise to knock it down and build a caravan or tourist park. For the caravan and tourist park industry, it is a one-way process.
125. Ironically, if that happens then it will be the State Government which will have to meet the new impost of social housing needs through allocation of alternate resources.
126. It will also be the State Government that has to supply the infrastructure to cater for the likes of "grey tourists".

127. A large number of the parks which have been identified in the group most affected by this issue of license fees are the very parks which provide the destination base for the annual migration of "grey tourists" which was outlined earlier. To lose these parks is to lose "grey tourists". To lose "grey tourists" would be a body blow to tourism in Queensland.....but no one is listening!
128. The other frightening thing that was learnt from our survey of member parks and in particular the detriment brought on by the scale of ERA license fees is that nearly all our member parks which fall within this category have now cancelled all plans for future development, improvements and expansion.
129. In addition to having to cancel further development of their businesses, many have had to lay off employees or scale back their current and / or future staff levels in order to continue in business.
130. In other words, the industry infrastructure that is needed to meet the needs of "grey tourists" and road travelling tourists generally in Queensland is being indirectly reduced or eroded by the effect of State Government policy as it relates to these fees. This situation is not sustainable in the medium or long term and there are already caravan and tourist parks on the market for sale as a result.
131. The issue of Land Tax also continues to drive the decline of the Caravan and Tourist Park industry in Queensland. Several of the other States have already withdrawn Land Tax payable in the case of caravan and tourist parks and those States are starting to reap the benefits of that decision.
132. Whilst Queensland is continuing to see caravan and tourist parks disappear, other States have managed to stop the trend through removal of Land Tax.
133. The latest threat is that of land valuations. If the State Government proceeds with plans to alter the way in which land valuations are applied to "improved" land, then caravan and tourist parks across Queensland will disappear.
134. One last issue that needs to be mentioned here is the issue of Rest Areas. Although there are in excess of 500 rest areas across Queensland, they are subject to legislation that can only be described as ludicrous. In addition to that, such facilities lack any enforcement to ensure that they are being used for purpose of use.
135. Queensland Transport Inspectors are not able to enforce the legislation relating to rest areas. Local Governments lack the power of enforcement to ensure that rest areas are not being abused and that leaves only one Agency in Queensland that is empowered to enforce Section 9 of the Transport Infrastructure (State-controlled Roads)

Regulation 2006. We are sure that the Queensland Police Service has many more pressing priorities other than the policing of rest areas.

136. For this reason, rest areas throughout Queensland are largely used as de facto caravan parks to the extent that in the peak season, it is virtually impossible in some places for motorists to avail themselves of the facility for the purpose for which they were installed in the first place. This Association has a plethora of examples to show this point.
137. Our Association has a Policy in relation to Road Safety Initiatives and takes this matter very seriously. It is very frustrating to see grey tourists not being able to pull to the side of the road to legitimately take a break because the area is full of campers.
138. There is a further side to this issue that needs addressing and that is that the RV lobby groups have quite actively lobbied Governments to provide free camping areas for their members by using the term "Rest Area". This is nothing more than a means to an end and does nothing for the promotion of legitimate rest areas in legitimate places. It runs opposite to the Policy of our Association relating to Road Safety Initiatives and we abhor such representations
139. The real justification for the location and style of required rest areas in Queensland can be researched in the Queensland Transport Crash Statistics. A quick look at those statistics will soon illustrate that grey tourists (or any tourists) are not becoming statistics due to driver fatigue in 60 Km/hr speed limited areas.
140. The overwhelming majority of casualty incidents in Queensland involving collision with fixed objects and driver fatigue occur in highway zones at highway speeds. This is a statistical fact of life.
141. This Association has no problem whatever in the establishment of legitimate rest areas. It is our Policy that we support Rest Areas. What is upsetting is that we try to work with the Authorities to ensure that Rest Areas are appropriately placed and equipped for purpose of use. Unfortunately, there has only been one occasion in the past three years when Main Roads Department have seen fit to even consult with this Association concerning Rest Areas in Queensland.
142. To their credit, that instance was a huge success and resulted in a worthy allocation of resources for the construction of a proper rest area in a most appropriate place.
143. At the very least, we want our clients (i.e. grey tourists) to be able to safely use the roads in Queensland and arrive in one piece at our parks. The message here is that they are road-based tourists first and grey tourists second.

**144. GREY TOURISTS IN QUEENSLAND – POTENTIAL VICTIMS
OF INADEQUATE LAWS**

145. Unfortunately, there is no shortage of examples of Local Governments throughout Queensland having different local laws. If you were to pick one issue, for example, illegal parking / camping of vehicle combinations which by legal definition are long vehicles (>7.5 metres Ref. Reg. 200 Transport Operations Road Use Management Legislation), you would be hard pressed to find uniform approaches by Local Governments throughout Queensland as the matter relates to regulation and compliance policies involving this class of vehicle combinations.
146. Ironically, the average grey tourist who drives a sedan car or a four wheel drive vehicle and tows an average size caravan is actually driving (in most circumstances) what is defined in Queensland as a long vehicle. This issue brings with it certain legal obligations such as one hour parking limitations in built-up areas etc. but Local Governments (generally) seem quite unaware of and oblivious to such issues.
147. For example, if you look at the issue of illegal camping and apply that to the number of Local Government jurisdictions that a grey tourist (or any class of tourist) in the drive market might encounter on a road trip from Brisbane to Port Douglas on the Bruce Highway, that tourist would encounter nearly twenty Local Government jurisdictions where the Local Laws relating to illegal camping range from virtually total indifference to zero tolerance accompanied by quite hefty fines.
148. Queensland residents are oblivious to the above disparity so this leaves grey tourists (and all other classes of tourists including international tourists) in quite a dilemma. This is in a State where our industry is also catering for the needs of international tourists who choose to travel as road travelers and who fly into our major airports to visit one of the Seven Wonders of the World.
149. To make matters worse, there is no uniform standard of adoption of model local laws by Local Government; no requirement for uniform standards of training of enforcement staff; no minimum standards for application of uniform compliance measures throughout the Local Government jurisdictions across the State.
150. Most importantly, there is no uniform baseline for application of Local Laws, enforcement of Local Laws and standardization of Local Laws by the 74 Local Governments in Queensland. There is not even a standard approach to training of compliance staff so that in remote areas, such staff and resources can be shared with common skills across jurisdictions.

151. This is in spite of the fact that this Association has furnished comprehensive submissions to the Queensland State Government warning of the threat to this industry and the potential for corruption if the situation was not addressed during the last review of Model Local Laws. So far, such submissions have fallen on deaf ears.

152. Unfortunately, as predicted by our Association, a number of the issues that were forecast have now come to the fore and we are starting to pay the price for lack of response and attention.

**153. RECREATIONAL VEHICLE CLUBS – LOBBYING OF
GOVERNMENTS**

154. One of the greatest impediments to the growth of road travel tourism in Queensland is the on-going lobbying of all levels of Government by RV user groups and clubs.
155. Clubs such as the Campervan and Motorhome Club of Australia (CMCA) are constantly in the ear of all levels of Government and are quite active when it comes to putting the case for their members.
156. Whenever the likes of RV Club lobby groups approach Government, it is generally with a wish list which amounts to a lobby for either free facilities or other types of advantage for their members. These approaches are generally made on the basis that such provision of services or facilities will bring wealth to a particular community or be good for tourism in that part of the world.
157. Several things have to be said about this situation in order to correct the misunderstanding that all levels of Government seem to share.
158. Firstly, Clubs and RV Club lobby groups are not the peak industry bodies when it comes to provision and supply of facilities and services that the grey tourist requires. They are not suppliers, they merely represent end-users and on that basis they are there to lobby on behalf of their members to gain the best possible advantage and facilities for their members.
159. When RV Club lobby groups approach one of the Local Governments in Queensland with a view to obtaining a free camping site or other such advantage for their members, they are in fact making an approach to the Local Government that is the regulatory authority for our commercial parks in that part of the world. Each Local Government in Queensland is responsible for the licensing and registration of commercial caravan and tourist parks within their area of jurisdiction.
160. Generally, an approach to Local Government by user groups such as RV Club lobby groups generally means that they are asking Local Government to provide a service or facility which will, ultimately, have an adverse impact upon the local commercial parks which that government is responsible for the regulation of. This is not always the case, but certainly, in a large number of instances this is the ultimate outcome.
161. Generally when this happens, our Association has to respond to the situation and make submissions to that Local Government with a view to getting some sensible level of overview happening. In a great

number of cases, something that has been proposed can have a devastating effect on the operation of local commercial parks.

162. There is also another problem that no level of Government (including Local Government) appear to have the slightest insight about and that is the issue of tourism promotion by our Association and the level to which we go to promote Regions in all parts of Queensland.
163. Our Association spends many thousands of dollars annually in the purchase of episodes of television lifestyle and travel programs. Generally the end results are aired in the lead-up to the caravan and camping show in June. This form of strategic marketing services the whole of the industry and promotes the notion of travel tourism to budding "grey tourists".
164. Why continue to promote tourism through our network when RV Club lobby groups are continuously involved in the promotion of ideas to Government that are aimed in the opposite direction of our marketing strategies. The frightening issue here is the fact that Governments entertain such lobbying and bend to requests by these people.
165. In other words, when our Association spends many dollars on promoting an entire Region for tourism and that promotion is paid for by our member parks across that Region, why should they then become the victims when Local Governments cave in to the requests of user groups (either through lack of understanding or fear) and start providing facilities for free and in blatant opposition to the businesses that have just promoted the area.
166. One of the incentives which are put before Local Governments is that of the Friendly Town scheme. Broadly, this marketing scheme is put before a Local Government on the basis that their town can be declared RV friendly if they are prepared to provide facilities to members of RV Club lobby groups, including such things as.....
167. Access to 24 hour medical and pharmacy services
168. Parking within close proximity to the general shopping area with groceries and fresh produce
169. A service centre for basic vehicle repairs
170. A visitor information centre and town map with essential services
171. Access to potable water
172. Access to a dump point
173. Provision of short term parking (24/48/72 + hour)
174. Provision of longer term parking within 5-20 Km of the town centre at a reasonable rate
175. RV friendly signs to be erected with the town environs.

176. If the town is unable to provide all of the above, then it may still qualify as an RV Friendly location or destination. (This information is available on RV Club lobby groups' web site for anyone to view).
177. Let's not fool around with what the central issue is here..... The central issue can be described in one word "**FREE**" and that is the basic difference between what user groups lobby Government for and what members of our Association promote as tourism for Queensland and for grey tourists.
178. Ironically, if one looks at the Web Site of the Casino Village in Northern New South Wales, advertised rates for un-powered sites for overnight start at \$14.00 per night (mini rally rate). This park was built by the main RV Club lobbyist group, i.e. CMCA.
179. Is it fair and logical that local ratepayers in towns and tax payers generally should be asked to subsidize the travel costs of a select group of people who opt not to want to pay for the same services that other "grey tourists" pay for?
180. Unfortunately, this scheme is being pushed at Local Governments in a lot of places in Queensland where the local commercial parks are suffering a direct detriment when the Council accepts the "kind" offer which has dubious value to local business.
181. There is another phrase that is being widely used to impress Governments and that is "self-contained" RV's. This is being done in a way that suggests that this is some new phenomena and that it must be addressed as a special issue. What is not being said is that the manufacturers in Australia were building self-contained caravans over thirty years ago.
182. There have been many cases where some of our member parks have made offers of un-powered sites for a minimum charge of approximately \$5.00 per night. In some cases, they have not had one taker.
183. What the State and Local Governments must realise is that the caravan and tourist park industry in Queensland (and the rest of Australia for that matter) has to manage peak, shoulder and low periods. Obviously, it is the average annual occupancy of a park that determines whether or not that park is a viable business.
184. In a lot of towns, particularly in remote areas where the Local Government has given in to the pleadings of such groups and where free camping sites have been given over to them, it is those sites that are damaging the viability of the parks in the shoulder seasons. When this happens, park operators have to review site charges and when fees have to be increased, it has a direct effect on grey tourists.

185. In a great number of situations, member parks will enjoy healthy occupancy rates for the peak season of the year. It is during the shoulder periods that the parks have to battle to pick up any business that will make their overall annual operation more progressive. This is of critical importance in remote areas where the peak season is reliant on climate and the fact that the peak season is so narrow in nature. .
186. We had a situation in 2009 when there were several very hot days towards the end of the peak season in Outback Queensland. This promoted the early departure of many interstate grey tourists.
187. It is during these shoulder seasons that our member parks are at their most vulnerable. It is at these times when they stand the chance of picking up business when their parks are not full and when they could otherwise increase their business and the slice of the pie from road based tourism. It is at these times when the damage of free camping sites that have been supplied by Local Governments causes the most damage.
188. Unfortunately, a great number of Local Governments and the State Government appear to have been conditioned to the belief that "any" type of tourism is "good tourism". That is another way of saying that if you provide something for free, then you will benefit enormously from such a strategy.
189. The reality is that the opposite is the case. When a grey tourist chooses to stay in one of our member parks, one of the first things that happens is that he / she is exposed to local business advertising in the front office of the park.
190. Our Association knows full well the value of referral tourism throughout Queensland. Any tour operator on the Cape will tell you gladly about the number of clients that he takes up the Cape simply because they were referred to him by the local caravan or tourist park operator.
191. When the Cairns Skyrail was first opened in far north Queensland, it was one of our member parks that won an award for selling the most tickets for the Skyrail in the first three months. The same applies with cruise operators who take clients out to the reef.
192. When you look at the grey tourist market west of the Great Dividing Range in Queensland, the biggest referral agent for tourism are the caravan and tourist parks. This is the general case and the grey tourist is then referred directly to the local available attractions and tourist services that they might like to enjoy whilst staying in that town or City.
193. This is called "referral tourism" and our members are very good at it. In other words, our parks are performing in the role of tourism

ambassadors when they take in clients. To test this issue, one has to simply ask how many free camp sites offer the same service for local businesses.

194. The CMCA has now joined forces with three Caravan Clubs to form a lobby group called Motouring Australia. It is this group that is currently trying to get the law in Queensland changed so that they can obtain unrestricted access to such places as showgrounds and reserves. They then intend to attempt to do the same thing in New South Wales and then West Australia.

195. If the State Government were to allow this to happen, then the demise of the Caravan and Tourist park Industry in Queensland would be assured. So too would be the ability of Queensland to service the needs of the "grey tourist".

196. The reality is that if a Local Government has to lure travelling tourists to their area by offering free camping to them, then it stands to reason that those travellers are going to be a bit more frugal when it comes to spending tourist dollars in the area.

**197. WHAT SHOULD BE DONE TO ENHANCE “GREY TOURISM”
IN QUEENSLAND**

- The State Government must realise that the issues raised in this submission paper are real and are a précis of the problems facing grey tourism and road based tourism generally in Queensland.
- The State Government has to realise that the issue of “Grey tourism” is directly related to and part of road-related tourism in Queensland.
- It is imperative that the State Government understands the extent of damage that is being applied to the caravan and tourist parks industry in Queensland through current and proposed Government Policy.
- It is of critical importance that urgent consideration be given to the formation of a working party involving both the Caravan Parks Association of Queensland Inc. and representatives of the Queensland Government. This party should be the source to drive actions to start the repair process that is so urgently needed. This party should include service providers and Government, not lobby groups or their representatives.
- The State Government can be assured that our Association members have the current capacity to cater for the needs of “grey tourists” who choose to come to Queensland and stay within our members’ parks.
- Unless the State Government is willing to get serious with inappropriate activities and practices by Local Government, then any repair or enhancement to road-related tourism in Queensland is doomed to failure.
- CPAQ stands ready to work with the Queensland Government to achieve a successful outcome to any endeavours to address the problems that have been outlined within this submission paper. All we need now is the will of the Government to make it happen before it is too late.

LIST OF ATTACHMENTS

CPAQ POLICY – Road Safety Policy and Initiatives

**CPAQ POLICY – Independent camping / Rest areas / Use
of Community and Government facilities for RV Parking**

**CPAQ POLICY – Use of Local Showgrounds and
Community Facilities (Overflow Policy)**

CPAQ SURVEY – Precis of responses from park
operators in Queensland who have been affected by the
EPA License fees increases that were introduced in 2009

MEDIA RELEASE – New South Wales Minister for
Tourism.....New Tourism Campaign to Promote Golden
Age of Camping.

CRVA FACT SHEET – Caravan , RV and Accommodation
Industry of Australia Ltd Fact Sheet of Industry Statistics
for both the Caravan Park Industry and the Caravan and
Motorhome Industry.

PRESS CLIPPING – Courier Mail, Wednesday February
17, 2010 re proposed changes to the Land Valuation
Legislation

RECEIVED

06 MAY 2010

Economic Development
Committee



**CARAVANNING
QUEENSLAND**

**ROAD SAFETY POLICY AND
INITIATIVES**

POLICY

**CARAVAN TRADE AND INDUSTRIES ASSOCIATION OF
QUEENSLAND
CARAVAN PARKS ASSOCIATION OF
QUEENSLAND INC.**

Scope, purpose and application of this Policy

- To provide guidance to all members of Caravanning Queensland both in the Caravan Trade and Industries Association of Queensland (CTIAQ) and the Caravan Parks Association of Queensland Inc (CPAQ) in relation to general Policy concerning the issue of road safety for clients of our industry across Queensland.
- To document the philosophies of Caravanning Queensland and to make road travel safer for clients across Queensland.
- To provide and encourage a basis for formal and informal arrangements with all levels of Government in Queensland with a view to the implementation of strategies that will promote the cause of road safety for our clients and the public generally.
- To develop and provide a set of guidelines that assist in the promotion of road safety initiatives for our members and all participating Government Departments, Agencies and Local Governments across Queensland generally.
- To promote and encourage general strategies that are consistent with Statutory and Government requirements in Queensland, including information to make road travel safer for industry clients and the public generally.
- To provide a platform from which proactive programs can be launched and to encourage authorities to establish properly constructed rest areas in appropriate places where fatigue is an obvious factor in local road trauma trends.
- To promote the notion that knowledge and education promote greater safety when towing and operating recreational vehicles.
- To promote the importance of not driving tired and making use of the appropriate road resources and techniques to promote safer operations of recreational vehicles.
- To promote the use of appropriate items of equipment to further enhance the safety aspects of using recreational vehicles.

POLICY STATEMENT

- CARAVANNING QUEENSLAND acknowledges and promotes the fact that road trauma consists of three elements, namely people, vehicles and roads.
- CARAVANNING QUEENSLAND promotes the practice of Association members and their staff bringing to the attention of their clients any item of ancillary equipment or accessory which they consider might aid their clients in the operation and control of their Recreational Vehicle (RV).
- CARAVANNING QUEENSLAND encourages the practice of Association members and their staff promoting any device or practice which will enhance the issue of road safety for their clients.
- CARAVANNING QUEENSLAND encourages Association members to promptly report to their clients any issue that might involve matters of safety or serviceability relating to the condition of their RV or associated equipment.
- CARAVANNING QUEENSLAND promotes the practice of training of clients in the use, management and basic maintenance of their RV.
- CARAVANNING QUEENSLAND openly promotes and encourages the practice of providing facilities to allow Agencies such as Police to deliver face to face road safety programs to clients in caravan Parks. This is particularly relevant in parts of the State that require special consideration when operating RVs, for example outback driving.
- CARAVANNING QUEENSLAND will continue to enlist the services of Government Departments and Agencies where they can assist in the delivery of training and provision of material as it relates to the issue of road safety.
- CARAVANNING QUEENSLAND will continue to provide venues for the inclusion of road safety issues and initiatives and will openly encourage the promotion of road safety initiatives at such events as the annual Queensland Caravan, Camping and Touring Holiday Show with the Queensland Motorhome and Campervan show, plus any other events organised by or involving CARAVANNING QUEENSLAND.
- CARAVANNING QUEENSLAND will continue to encourage Local Governments across Queensland to move away from the provision of free camping areas within town precincts so that properly constructed

rest areas can be promoted and located in highway locations where fatigue is a known problem.

- CARAVANNING QUEENSLAND will continue to openly promote any Department, Agency Local Government or group which is involved in the provision of training relating to the safe operation and management of RV's.
- CARAVANNING QUEENSLAND will continue to promote the use of properly constructed and located rest areas as facilities that should be used by clients to avoid the effects of fatigue rather than for extended camping and holidaying purposes.
- CARAVANNING QUEENSLAND will continue to work closely with Queensland Police in an endeavour to promote road safety both generally and within caravan parks and through trade events.



**INDEPENDENT CAMPING / REST
AREAS / USE OF COMMUNITY AND
GOVERNMENT FACILITIES FOR RV
PARKING**

POLICY

**CARAVAN PARKS ASSOCIATION OF
QUEENSLAND INC.**

Scope, purpose and application of this Policy

- To provide guidance to all members of the Caravan Parks Association of Queensland Inc (CPAQ – the Association) in relation to general Policy concerning the issues of independent camping, Rest Areas and use of community and government facilities for the parking of Recreational vehicles (RV's).
- To document the philosophies of the Association and to set guidelines for the implementation of actions consistent with policy.
- To provide a basis for informal / formal arrangements with Local and State government concerning appropriate strategies to service community needs.
- To provide a set of guidelines that assist in the promotion of tourism initiatives for local communities and Queensland generally.
- To promote general strategies that are consistent with Statutory and Government requirements, including issues such as the purpose of use of Reserve Land which is often involved where showgrounds and other reserves are involved.
- To assist Local Government with a partnership philosophy when dealing with the use of local facilities to service the needs of tourism.
- CPAQ expects that Local Authorities (generally) and State Government will not allow any pricing schemes or business practices to be employed by itself or its agents in relation to the use of community facilities which could undermine the viability of the commercial caravan and camping parks which Local Government regulates within its own jurisdiction.
- In situations where a community might have annual events where existing commercial parks cannot cope with numbers, then CPAQ has no issue with the additional use of community facilities as long as an Overflow Policy is put in place and the local commercial caravan and camping parks are parties to the agreement.

POLICY STATEMENT

INDEPENDENT CAMPING

- CPAQ acknowledges and promotes independent camping where it does not cause immediate detriment to established commercial caravan and tourist parks.
- CPAQ supports independent camping when and where it is done in a way that is not contrary to law or Government policy.
- CPAQ supports independent camping where the environment is protected and not damaged by inappropriate or unlawful behaviour.
- CPAQ supports independent camping but not where it is sponsored and promoted by an Authority that is responsible for the regulation of commercial caravan and tourist parks and where the independent camping facility is close enough to commercial parks to cause a detriment.
- CPAQ does not support the supply of facilities for independent camping by commercial businesses where such businesses are not licensed as commercial caravan parks or camping grounds and where such practices cause a potential detriment to established and licensed commercial parks.
- CPAQ does not support the open promotion and advertisement of independent camping areas which result in damage to the environment or adverse and unfair detriment to established commercial caravan and tourist parks.

REST AREAS

- CPAQ believes that genuine rest areas should be provided and located on major highways for access by travelling motorists in such a way as to provide maximum anti-fatigue benefits. This is of critical importance in the fight against road trauma.
- CPAQ believes that Rest Areas should be constructed to a minimum standard and that they should provide minimum standards to address the issue of fatigue by drivers when engaged in long distance travel.
- CPAQ believes that Rest Areas should be subject to a maximum stay of 20 hours (when correctly located) and that this should be enforced

by the authority responsibility for the area whether it be Local Government or State Government.

- CPAQ believes that rest areas should be promoted for “purpose of use”. In other words, they should be promoted as “short-term resting areas” to provide an anti-fatigue facility and not as an alternative to commercial caravan and camping parks.
- CPAQ believes that rest areas should be promoted as facilities that are not available to be used by persons as a free alternative to commercial parks simply because they are free of charge.
- CPAQ believes that Government should not only be active in the promotion of rest areas as an anti-fatigue strategy but that Government should also be actively involved in the promotion of the use of commercial caravan and camping parks that will provide a better quality of sleep away from the 24/7 background noise of busy main highways and where power, water and other creature comforts are available to facilitate better rest for weary travellers.
- CPAQ does not condone the tactic of the threat of boycott by any group when they are lobbying Government to provide free facilities for members. Local Authorities should not be pressured into providing free facilities (at cost to local ratepayers) simply to placate the requests of specific interest groups, organisations or clubs and the like.
- CPAQ does not condone the establishment, supply or sanctioning by Local Government of independent camping or overnight camping facilities within built-up areas when such facilities are in close proximity to established commercial parks which are being regulated by the same Authority.

USE OF COMMUNITY AND GOVERNMENT FACILITIES FOR RV PARKING

- CPAQ acknowledges and accepts the existence of Policy by the Department of Natural Resources and Water as it relates to the use of Showgrounds throughout Queensland for parking of RV's.
- CPAQ does not accept the inappropriate use of Government facilities to provide commercial services and facilities to owners of RV's where that supply of services and facilities results in a direct detriment to established commercial caravan and camping parks.
- CPAQ does not accept the inappropriate commercial use of Government facilities to unfairly compete with a commercial advantage

over established commercial caravan and camping parks by making use of community or State property to achieve that purpose.



**USE OF LOCAL SHOWGROUNDS &
COMMUNITY FACILITIES**

OVERFLOW POLICY

**CARAVAN PARKS ASSOCIATION OF
QUEENSLAND INC.**

Scope, purpose and application of this Policy

- To provide guidance to all members of the Caravan Parks Association of Queensland in relation to general Policy concerning the use of showgrounds (community facilities) and overflow strategies.
- To document the philosophies of the Association and to set guidelines for the implementation of overflow policy.
- To provide a basis for informal / formal arrangements with Local Government concerning appropriate strategies to service community needs.
- To provide a set of guidelines that assist in the promotion of tourism initiatives for local communities and Queensland generally.
- To promote general strategies that are consistent with Statutory and Government requirements, including issues such as the purpose of use of Reserve Land which is often involved where showgrounds and other reserves are involved.
- To assist Local Government with a partnership philosophy when dealing with the use of local facilities to service the needs of tourism.
- There are generally two situations where this Policy has application, namely, where communities are serviced by the presence of only a caravan park and secondly, where communities are serviced by both the presence of a local caravan park **AND** local showground / sportsground / community facility.
- In situations where there might be a community showground or sportsground (community facility) **AND** there is no licensed commercial caravan or tourist park within the same community, then the Caravan Parks Association of Queensland (CPAQ) has no issue with the discretionary use of such a facility by the local community to accommodate recreational vehicles. This is conditional upon such arrangements being in accordance with the purpose of use of such land and the fact that such use is not contrary to law.

- In situations where both a showground / sportsground **AND** a commercial licensed caravan or tourist park exists, CPAQ expects that the Local Authority will act with professionalism and respect the rights of such commercial parks to operate without fear of unfair and unprofessional competition which might be caused by the inappropriate use of such showgrounds /sportsgrounds by itself or its agents.
- CPAQ expects that Local Authorities (generally) will not allow any pricing schemes or business practices to be employed by itself or its agents in relation to the use of community facilities which could undermine the viability of the commercial parks which that Local Authority regulates within its own jurisdiction.
- In situations where both Commercial parks and showgrounds exist and situations arise when the accommodation needs of campers and people in recreational vehicles cannot be accommodated by commercial parks alone, then CPAQ has no issue with the additional use of showgrounds and such places generally, conditional upon the Local Authority entering into agreement with the local parks to implement the Overflow Policy.
- In situations where a community might have annual events where existing commercial parks cannot cope with numbers, then CPAQ has no issue with the additional use of community facilities as long as an Overflow Policy is put in place and the local commercial parks are parties to the agreement.

CARAVAN PARK OVERFLOW POLICY
(FOR USE OF SHOWGROUNDS & COMMUNITY FACILITIES)

BACKGROUND

The "Overflow Policy" as described below is a strategy that is already in use in Queensland and works well.

In many provincial and country environments, there is often a tourism demand during peak tourism periods when the capacity of existing commercial caravan and tourist parks is at saturation.

It is at such times that local communities run the risk of missing tourist business and both local business and the local community can suffer if strategies are not in place. This is particularly so in areas where the peak tourist season is very narrow.

PURPOSE OF POLICY

The purpose of this Policy is to aid both Commercial Caravan and Tourist Parks, and Councils, by facilitating a system of referral for overflow clients to local showgrounds (or community facilities) at times when Commercial Parks within the immediate area are full and no longer can accommodate new clients.

The idea of having such a Policy is to ensure the prudent use of Showgrounds and community facilities under circumstances where no conflict of interest is caused by Local Government and no commercial detriment is caused to local and established businesses.

The use of this strategy also allows Local Government to put this action into place and to avoid the pleadings of minority groups who want special treatment and facilities supplied that local residents end up having to pay for.

WHO WINS

Everyone!

Local Government wins because it is able to make use of its showground and community resources under circumstances where it is not creating a commercial impost against caravan and tourist parks that are regulated by it under Local Law. It is also then conducting Local Government business in a way that promotes healthy local business within the community and supports local businesses.

Local Government is able to maximize use of a facility in a way that does not conflict with "purpose of use" principles as required by State Law.

Local caravan and tourist park operators win because their businesses are allowed to work in harmony with Local Government resources and without detriment to their commercial viability.

The Local Economy wins because people who travel in "large rigs" who would otherwise have kept driving without appropriate site facilities can be accommodated and their tourist benefits harvested by the local economy.

Park owners and operators win because at times when peak tourist season pressures are present and sites are at a premium, alternate arrangements are available for the operator to refer the prospective client to another location.

Finally, the tourist wins because they are provided with an option that might not have been otherwise available to them if the policy were not in place.

HOW DOES IT WORK

1. Local Government prepares supplies of numbered dashboard certificates and distributes to the local caravan parks.
2. Local Government also prepares a Sketch Plan of the local showgrounds and indicates the approximate location of all facilities and sources of 240Volt mains power for connection to Recreational vehicles. The location of all fire fighting appliances should also be indicated on the Plan.
3. Local caravan park proprietors are responsible for the safe custody of the numbered dashboard certificates.
4. When a caravan park proprietor encounters a situation where his park is full or is unable to accommodate a request for accommodation because of the size of the rig or other issue, he is then responsible for a “ring around” to try and locate another nearby caravan park where there are current vacancies and where the needs of that client can be met.
5. In the event that a caravan park operator is not able to locate an alternative caravan park for a client, that operator can then (and only then) make use of the dashboard certificate as issued by Local Government and issue the Certificate to the client on the basis that they can proceed to the local showgrounds and set up at that location and make use of the facilities within the Showground. The process should be explained to the client who obviously has the sole discretion on whether to accept the overflow offer or not.
6. The client should be informed that there is no other local accommodation available within Commercial parks but that there is an Overflow Policy in place with the Local Government. The process should be fully explained to the client who then has the option of accepting the offer or declining.
7. The caravan park operator is responsible for filling out the Certificate with the details of the client including....
8. Registration number of tow vehicle
9. Name of issuing caravan park
10. Date of referral
11. Number of nights paid
12. Client register number

13. The Park Operator is responsible for handing both the dashboard certificate and copy of sketch plan to the client and explaining that the dashboard certificate must be displayed on the dashboard of the vehicle at all times whilst the client is staying within the showground.
14. The Park Operator levies a charge upon the client for accommodation at the Showground. This amount is twice the pre-agreed amount that Local Government has set as an appropriate fee to Council for supply of facilities and services. The Park Operator retains half the amount charges and remits the remainder to Local Government.
15. Remittance to Local Government is conducted on a monthly basis. Such remittance notice outlines full details of each client and date of the referral. If no clients have been referred to the Showground during the reporting period, then a "Nil return" is submitted to Local Government by the Park Operator.

SUMMARY

This Policy is a strategy that can be put in place in most circumstances. It is merely a memorandum of understanding between Local Government and local caravan and tourist parks. This strategy is aimed squarely at promoting a working partnership between Local Government and local Caravan and Tourist Parks

Although no system is perfect, this strategy is promoted as a way in which local communities (including Local Governments) throughout Queensland can maximize operational efficiencies and tourism benefits without causing local detriment.

Comment has been made that there is an ability for individual park owners to refer the client directly to the showground without engaging the "ring around" to fellow parks owners first. In this way, such an operator could ensure receipt of half the premium to be paid by the client.

This fear can be simply removed by ensuring that all participating parties are signatories to the memorandum of understanding and that the Local Government keeps an "OPEN" register of ALL monthly returns for all parties to check or peruse at short notice. In this way, the system can remain open and accountable to all parties.

Likewise, it has been said that this Policy can be weakened in situations where minority groups and / or RV clubs approach the Local Government DIRECT seeking use of the local Showgrounds.

In these circumstances, the Local Government should ensure that this is a situation where, because of numbers, types of rig etc. none of the local commercial parks could accommodate such a request. If that were to be the case, then the Local Government should proceed to make the local Showgrounds available.

In this situation and for the sake of equity for all parties, Council would then remit 50% of the total takings for such stays to the participating parks evenly.

N.B. If the basics are followed and enforced, no party should suffer detriment.

There will always be situations where local requirements require variations to make this approach work.

This Policy should be viewed as a starting point for negotiations. Flexibility is highly recommended to ensure that workable outcomes are achieved.

PRECIS OF RESPONSES

SEWAGE TREATMENT SURVEY -2010

<u>Division</u>	<u>Future Development</u>	<u>Labour Issue</u>	<u>Future trading</u>
Brisbane Region (increase of > 2000% in fees in 2009)	Because of the lack of notice of the increase in these fees, we are now unable to plan for future development	We cannot afford to pay the increase in fees so we are certainly not going to be able to afford wages for more employees	We do not know what the future holds now because this fee has removed our cash flow which was used for maintenance and improvement programs
Brisbane Region (increase of > 1000% in fees in 2009)	No further expansion or development is now planned short term because of the fees	There has been no direct effect on employment of staff because we have simply opted to pass on the costs to our clients. This naturally has an overall effect on the future viability of parks generally.	It may be that we have to reconsider our future further on.
Brisbane Region (unknown increase at this time)	Dependent on new license fee, yet to be advised	Dependent on new license fee, yet to be advised	Dependent on new license fee, yet to be advised
Bundaberg (increase of >1000% in fees in 2009)	We will not be expanding our business because to do so will lift our fees payable to EPA by double our current fee to over \$10,000. It is therefore not feasible to consider growing the business any longer	Our ability to employ has been virtually destroyed	We are re-considering the future of our park because the running costs have now blown out and are too prohibitive.
Bundaberg (increase of >1000% in fees in 2009)	We will not be able to expand our sites without being affected by these fees. It is now no longer a viable option to put in extra sites.	Because we cannot further develop our business, we are unable to employ any further staff	We are seriously considering our future in the industry. Because our park is a small park (by comparison) we will soon be unviable because of

<u>Division</u>	<u>Future Development</u>	<u>Labour Issue</u>	<u>Future trading</u>
			the EPA fees.
Bundaberg (increase of >1000% in fees in 2009)	This has destroyed our capacity to improve, upgrade and maintain facilities as we are not a high profit business	The new fees have put the idea of additional staff totally out of the question. On top of having to pay the new EPA fees, we also have to keep paying for the cost of water testing of treated septic effluent	We are seriously considering our options at present but will have to take action shortly. These fees (when combined with the increase in electricity charges) have put a huge burden on our business.
Cairns TNQ (increase of >1000% in fees in 2009)	Has stopped all plans for future development and expansion of our park	Has had a devastating effect on our ability to employ staff. No further staff will be employed.	We are seriously considering both our future and the future of our park in light of the new EPA fees
Cairns TNQ (increase of >1000% in fees in 2009)	We received our renewal from DERM in November 09; this has had a major effect on our plans for expansion.	We have had to put off several staff and increase our front office hours to compensate for the loss of staff. This is non sustainable long term.	This has affected future trading. We are now officially on the market for sale and will be leaving the industry as soon as we can secure a sale of the business.
Cairns TNQ (unknown increase at this time)	Dependent on new license fee, yet to be advised	Dependent on new license fee, yet to be advised	Dependent on new license fee, yet to be advised
Cairns TNQ (unknown increase at this time)	Dependent on new license fee, yet to be advised	Dependent on new license fee, yet to be advised	Dependent on new license fee, yet to be advised
Cairns TNQ (unknown increase at this time)	Dependent on new license fee, yet to be advised. We are very wary of installing new cabins in case we have to change specifications of our sewage treatment plant.	Dependent on new license fee, yet to be advised. If we do not install new cabins or develop the park further, then we do not have the capacity to employ additional staff.	Dependent on new license fee, yet to be advised, however, we are re-considering our future very much. With this threat hanging over our heads, we do not intend to expand, develop or hire further staff until such time as we know our situation.
Cairns TNQ (unknown increase at this time)	Dependent on new license fee, yet to be advised. If we have to pay a minimum of \$10,000 then we will have to sell	Dependent on new license fee, yet to be advised It would have a huge impact	Dependent on new license fee, yet to be advised
Cairns TNQ	Dependent on new license fee, yet	Dependent on new license fee, yet	Dependent on new license fee, yet

<u>Division</u>	<u>Future Development</u>	<u>Labour Issue</u>	<u>Future trading</u>
(unknown increase at this time)	to be advised.	to be advised.	to be advised. If new fees are applied to our park then it will have a very significant influence on our future development and trading options.
Cairns TNQ (unknown increase at this time)	Dependent on new license fee, yet to be advised.	Dependent on new license fee, yet to be advised.	Dependent on new license fee, yet to be advised. If new fees are applied to our park then it will have a very significant influence on our future development and trading options.
Central (increase of > 2000% in fees in 2009)	Unsure but maybe no further expansion	Staff already put off	Not sure at this time, but trying to sell in case
Central (increase of >1000% in fees in 2009)	Because we are a seasonal park this has severely impacted on any further development	Severe impact on ability to employ local staff	Currently planning closure of the park.
Central (increase of > 2000% in fees in 2009)	Unsure of the level of effect but may have to spend large amount of money to connect to sewage if possible	The new license has had a definite effect on the level of our ability to employ local staff	We are currently considering our future in the industry
Central (increase of >1000% in fees in 2009)	Planned improvements have all been put on hold. Ours is a seasonal park with little income for five months of the year.	We were going to employ another person but not now	We are currently considering our future and the future of our business
Central (increase of >1000% in fees in 2009)	Everything has been put on hold because we now need to increase our fees to cover the last EPA License fee that had to be paid	No because with the increase in the fee, we have given up on the idea of employing another person	We will try to carry on in our business. The Queensland Government should have given some warning of a greater than 1000% increase in fees so that we could

<u>Division</u>	<u>Future Development</u>	<u>Labour Issue</u>	<u>Future trading</u>
			have made some arrangements to increase our charges to cover the increased operating costs. This has put us backwards because of the way in which it was done.
Southern Downs Region (increase of >1000% in fees in 2009)	Unable to expand the park further because it would require expansion of the sewage plant and would force us into greater fees	Has had a direct effect on level of employment of local people	Total futility. Have not decided at this time but taking action to sell in the near future
Southern Downs Region (increase of >1000% in fees in 2009)	We will not be expanding beyond 99 E.P. volume specs. Otherwise we would double our EPA Annual License fee, therefore our future development has been effectively stopped.	One casual cleaner has now been dismissed and can no longer be retained. This is partly to cover cost of the new fees.	Yes, we are currently discussing all options.
Southern Downs Region (increase of > 2000% in fees in 2009)	We have stopped all expansion plans for the future and will not be developing the business any further because of the new fees	Has had a direct on level of employment of local people	We are currently re-considering the future of our park and whether or not it will be viable to keep it open.
Southern Downs Region (increase of > 2000% in fees in 2009)	This has impacted adversely on aspects of our business	This has impacted adversely on aspects of our business	This has impacted adversely on aspects of our business We are re-considering our future and what to do with the park
Southern Downs Region (increase of > 2000% in fees in 2009)	All future development is on hold until such time as we can reduce these fees	We are fairly remote and do not employ locals as such	No. Trying to fathom the "reduced fees" is almost impossible and no-one in EPA can explain it to us.

<u>Division</u>	<u>Future Development</u>	<u>Labour Issue</u>	<u>Future trading</u>
Southern Downs Region (unknown increase)	Dependent on new license fee, yet to be advised.	Dependent on new license fee, yet to be advised.	Dependent on new license fee, yet to be advised.
Southern Downs Region (unknown increase)	Dependent on new license fee, yet to be advised.	Dependent on new license fee, yet to be advised.	Dependent on new license fee, yet to be advised.
Sunshine Coast (increase of >1000% in fees in 2009)	Have put off expansion because money has had to be diverted to license fees	Staff already put off	Not sure but uncertainty always makes it difficult to provide a quality product
Sunshine Coast (increase of >1000% in fees in 2009)	The park cannot now be expanded any further	No effect to date	We are currently considering our future and whether to continue in the park or sell
Sunshine Coast (increase of >1000% in fees in 2009)	Site fees will have to be increased to cover the extra costs. This will include elderly people in low cost housing.	No effect to date	The value of the park has been reduced because of the fees. DERM have told us that there is no such thing as a treatment plant with nil discharge. We discharge treated effluent on to our land by way of irrigation and DERM consider this to be a discharge into the environment.
Townsville (unknown increase)	Our plant is septic and is discharged into the sewage system. Future development will depend on Council charges	If EPA force Council to increase their Council charges, then this will definitely affect us.	Our future is dependent on what EPA does in the future
Townsville (unknown increase)	Dependent on new license fee, yet to be advised.	Dependent on new license fee, yet to be advised.	Dependent on new license fee, yet to be advised.
Townsville NQ	These fees have stopped all future	Now unable to employ locals within	Local Council charges \$200 per

<u>Division</u>	<u>Future Development</u>	<u>Labour Issue</u>	<u>Future trading</u>
(increase of >1000% in fees in 2009)	development. Further expansion will never happen with the current fee structure in place. Further expansion would double the license fee from \$5,500 to \$10,600 per annum	the park because of the extra cost of fees which were introduced without any warning on 1/1/09	month to visit the park and take a water sample. On top of this, the Council has now increased their annual fee to \$2,400
Townsville NQ (increase of >1000% in fees in 2009)	We have now stopped all plans for expansion or further development because this will further increase the huge EPA fees and force us up into a higher bracket	We now have less money to employ staff and have taken action to reduce our reliance on use of staff within our operation.	The EPA fees have now forced us to re-think our future. We will certainly not be expanding and will probably be selling.
Townsville NQ (increase of >1000% in fees in 2009)	We have had to cut back all our plans	We now have a reduced capacity to employ local people.	We may have to re-consider our future in the industry.
Townsville NQ (increase of >2000% in fees in 2009)	Slowed down our development significantly	No effect to date	No effect to date
Whitsunday (increase of > 2000% in fees in 2009)	All expansion plans have ceased and this will no longer be happening	We had just employed two local people but have had to put them off because of the license fee increase	We cannot keep going with the new fees. The park is on the market and we are gone as soon as possible. This is a large park and will probably go to development.
Whitsunday (increase of > 2000% in fees in 2009)	The new fees have delayed our planned expansion. We will probably have to severely limit our expansion program which we wanted to have completed for the peak tourist season	Our ability to employ local people within our business has been severely curtailed. We have recently ceased employing one employee with a view to saving costs due to the new fees.	We have already reviewed the extent of addition of new sites to cater for increased trends in tourism and this will result in an on-going inability to meet demand in the peak season. The sale of our park in the near future is a real consideration.
Whitsunday	Because added to all other costs that	The application of these fees mean	The future viability of our business is

Jodi McKay

Minister for Tourism
Minister for the Hunter
Minister for Science and Medical Research
Minister for Women



Thursday 11 February 2010

NEW TOURISM CAMPAIGN TO PROMOTE GOLDEN AGE OF CAMPING

Minister for Tourism Jodi McKay has announced a new \$166,000 campaign set to encourage a golden age of camping and caravanning in NSW.

"Camping and caravanning is an Aussie holiday tradition and NSW has such a great range of locations, from beachside to inland holiday parks, all very accessible and with modern facilities.

"Camping is one of the State's fastest growing tourism sectors, offering a great holiday experience at a moderate cost. Almost 10 million nights were spent camping in NSW last year.

Ms McKay said the campaign, which kicks off on Sunday 14 February, is a partnership between the NSW Government and the Caravan and Camping Industry Association NSW (CCIA).

"This new joint campaign will highlight some of the best experiences on offer to families and everyone looking for a relaxed caravan or camping holiday in NSW.

"The CCIA helps its members deliver a quality product that strengthens the appeal of a holiday in NSW and I am delighted that they have joined with Tourism NSW for this campaign."

Ms McKay said NSW was home to more than 30 per cent of Australia's caravan and holiday parks.

"The NSW South Coast, Mid North Coast and Northern Rivers regions represent the top three caravan and camping destinations in Australia, according to Tourism Research Australia.

"It's possible to experience almost every kind of environment that Australia offers without leaving NSW in our holiday parks and campsites and we have some fantastic nature experiences ideally suited to campers and caravanning families," Ms McKay said.

Barry Baillie, CEO of the Caravan and Camping Industry Association of NSW (CCIA) said that caravan and camping tourism has experienced a real resurgence over the past decade.

"The value for money, camaraderie and quality experiences offered by caravan and camping holidays is what attracts many Australians to the lifestyle."

"Over summer, many coastal holiday parks were booked up until the Australia Day holiday with many reporting an increase in travellers using camper trailers and tents on powered sites."

"We are pleased to be working with Tourism NSW to highlight the caravan and camping sector which can provide something for every budget - from a two man tent through to a luxury motorhome," said Mr Baillie.

For more information on NSW's caravanning and camping experiences go to www.visitnsw.com/touring or www.caravan-camping.com.au.

Media Contact: Andrew Parkinson 0447 202 091



Industry Statistics (As at July 1, 2008)

Employment More than 25,000 people are directly employed in the Industry (CRVA)
 Industry Turnover \$3.1 billion (approx.)

Caravan Park Industry (As at July 1, 2008)

No. of Establishments 2500 (does not include an approx. additional 200 Caravan Parks with predominantly permanent sites.) (CRVA)
 Total Capacity 233,823 nightly (87.4% available for short-term visitor accom.) (ABS)
 (ABS figures based on approx. 1450+ caravan parks with more than 40 powered sites)
 No. of Cabins 26,812 short term & 6,606 long term (ABS)
 (ABS figures based on approx. 1450+ caravan parks with more than 40 powered sites)
 No. of Site Nights Occupied 45 million (ABS)
 Number of site night occupied is greater than room nights spent in all other tourism accommodation sectors (ABS)
 Turnover Annually \$540 million - 1996 (CRVA)
 \$725 million - 2001 (CRVA)
 \$1.3 billion - 2007 (CRVA)
 Accommodation Price Range From \$25.00* (Powered Site average) (CRVA)
 From \$20.00* (Unpowered Site average) (CRVA)
 From \$85.00* (Cabin Accommodation average) (CRVA)
 Industry Infrastructure Value \$5.5 billion (CRVA)

*NB: Prices vary in peak times.

Caravan and Motorhome Industry (As at July 1, 2008)

New caravans manufactured annually 17,800 (2005) (Recreational Vehicle Manufacturers Association of Australia RVMAA)
 18,550 (2006) (Recreational Vehicle Manufacturers Association of Australia RVMAA)
 19,200 (2007) (Recreational Vehicle Manufacturers Association of Australia RVMAA)

A caravan is manufactured in Australia every 9 minutes. (Based on a 38 hour week)

Forecast manufacturing statistics for 2008 are approximately 17,000 new Caravans (average approx. \$45,000 each), 3,000 Tent Trailers (average approx. \$15,000 each), 1,500 Park Cabins (average approx. \$85,000 each) and 2,000 Motorhomes (average approx. \$110,000 each) contributing 65,000 new beds into Tourism. In 2008 it is estimated that 250,000 tents will be sold (average approx. \$250 each).

The production of Caravans and other Recreational Vehicles has more than quadrupled since the early 1990's.

(CRVA Research)

Number of Caravan manufacturers nationally	61 (CRVA)
Number of Motorhome/Campervan manufacturers nationally	32 (CRVA)
Number of Camper/Tent Trailer manufacturers nationally	139 (CRVA)
Number of Slide on Campers manufacturers nationally	18 (CRVA)
Number of 5th wheeler manufacturers nationally	12 (CRVA)
Number of Park Cabin manufacturers nationally	37 (CRVA)
Number of Tents/Swag manufacturers nationally	25 (CRVA)
Number of retail dealerships nationally	250 (CRVA)
Dollar value amount of product sold at the 5 state caravan shows	\$123 million (CRVA)
Number of caravans registered	Approx. 360,000 (CRVA)
Number of motorhomes registered	Approx. 30,000 (CRVA)
Age of caravan purchaser	25-39 (7.4%), 40-54 (20.5%), 55-69 (65.3%), 70+ (6.8%) (CRVA)

86% of the entire Australian population has stayed in a caravan holiday park at least once in their lives

90% of Australians aged 35-44 have stayed in a caravan holiday park at least once in their lives

86% of Australians aged 45-54 have stayed in a caravan holiday park at least once in their lives

91% of Australians aged 55+ have stayed in a caravan holiday park at least once in their lives

(CRVA Strategic Alliance Research July 2008)

The largest current user group is the 35-49 year olds with 2.1 million having recently stayed in a caravan holiday park predominantly in cabin accommodation. 1.7 million 50+ year olds have recently stayed in caravan holiday accommodation, predominantly using caravan/motorhome powered accommodation, and 1.4 million people aged 25-34 have stayed in a caravan holiday park recently, predominantly using camping style accommodation.

(CRVA Strategic Alliance Research July 2008)

Caravan, RV & Accommodation Industry of Australia Ltd (CRVA)

The information in this fact sheet should be used as a guide only. For more information please contact CRVA
 T (07) 3262 6566 F (07) 3262 9989 E info@crva.com.au www.welovethiscountry.com.au



www.welovethiscountry.com.au



Rapist appeals term

THE "bikeway rapist" who terrorised Brisbane for more than two years wanted his 25-year jail term reduced because the sentencing judge was too harsh in all the circumstances, a court heard yesterday.

Last year in the District Court, Luke James Colless, 32, was jailed after admitting to assaulting 11 women on paths and bikeways around Brisbane during a 27-month period.

In the Court of Appeal yesterday, barrister Car Heaton, for Colless, argued the 25-year jail term was manifestly excessive. He said when precedent cases were considered the starting point for the sentence should have been 15 to 20 years.

However, the Director of Public Prosecutions, Tony Moynihan, SC, said Mr Heaton had identified no error in law in the sentencing procedure.

He said Colless was a "serial rapist and sexual predator" who disregarded his victims and had contributed to a climate of fear in Brisbane.

The Court of Appeal reserved its judgment.

Valuations Bill 'threat to jobs'

Michelle Hele
PROPERTY EDITOR

PROPOSED changes to land valuation legislation could result in massive job losses and discourage business investment in this state, the Property Council of Australia has warned.

PCA Queensland executive director Steve Greenwood believes if the proposals go through, large property owners may decide it is time to sell off their assets.

He has labelled the legislation as "ill-conceived" and a "devious" move to rob the industry of hundreds of millions of dollars.

Mr Greenwood said even those who did not own property directly could be affected because many superannuation funds were owners of commercial property.

"Now the Government has found itself backed into a corner where they must retrospectively amend legislation so that it does not have to repay property owners money that the Government has taxed and spent outside the scope of the legislation," he said.

Land valuations are used to determine rates and land tax. The higher the value of the land the higher the tax.

Natural Resources Minister Stephen Robertson told Parliament the amendments were in relation to a recent court decision.

In a Court of Appeal case, Pacific Fair's 2002 land valuation of \$180 million was reduced to \$47.49 million.

Mr Robertson said the legislation would confirm what information could be taken into ac-

count when determining the value of land.

"This Bill makes unequivocally clear that valuations for commercial and industrial properties in Queensland must continue to reflect the value of the land at its best and highest use including the development premium embodied in leases," he said.

Mr Greenwood said it put a tax on being a successful business.

Mr Robertson said the recent court decision overturned decades of past practice in the valuation of commercial property.

"While I understand that the commercial property owners would prefer lower valuations because it means lower council rates and land tax, our duty is to protect the interests of the community as a whole and ensure consistency.

"If we don't correct the Appeal Court's interpretation of the law, then we would be accepting commercial property valuations on a fundamentally different basis to other property valuations, which recognise how land is actually used in the real world."

Mr Greenwood said land values should be determined by size, location, infrastructure, surrounding population and any development approvals.

He said these were tangible things and the State Government now wanted to take intangible things into account.

Shopping Centre Council of Australia executive director Milton Cockburn said the legislation would massively increase the cost of doing business in Queensland.

Stamps & Coins



Mowbrays Australia (formerly Stanley Gibbons) are currently seeking Collections of Stamps, Coins, Banknotes, Postcards, Cigarette Cards, Deceased Estates etc for their Public Auctions (record breaking results) or outright purchase.

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Conroy adviser scores job with major telco

A FORMER senior media adviser to the Minister for Communications and Broadband took a senior job with a major telco within days of it being granted involvement in a \$250 million Government tender to fix "black-spots" in regional Australia.

Senior ministerial staff are banned from taking a job that

would involve lobbying their former department under a code of conduct implemented by the Prime Minister.

Senator Stephen Conroy yesterday defended his ex-press secretary Tim Marshall, who left his office on January 22 to take up a corporate role with international telco Alcatel-Lucent, partnering

on a new National Broadband Network project.

Mr Marshall and his new employer deny any wrongdoing.

The scandal comes as Senator Conroy was forced to admit his meeting with Seven boss Kerry Stokes on the Colorado slopes, one month before massive cuts to TV licence fees, was planned.



MORE WORRIES: Senator Stephen Conroy.

[REDACTED]

From: Tony Benson [tony@caravanqld.com.au]
Sent: Wednesday, 5 May 2010 12:46 PM
To: Economic Development Committee
Subject: Further submissions regarding grey tourism

Lyndel,

Thank you for your recent letter in which you invite our further submissions concerning the issue of grey tourism.

There are just several points that we would like to add to our submissions as hand-delivered by me to the Committee in the recent past. They are as follows.

ADDITIONAL SUBMISSIONS

At point 7.0 of the Issues Paper No 3, i.e. commencing with the words "Governments can play a role" etc. On behalf of the Caravan Parks Association of Queensland Inc. I wish to simply add the following statement concerning that point.

The services mentioned within this paragraph are services that are all available within our member parks. The simple difference here is that members of such clubs as the CMCA choose to avail themselves of such services at zero cost to themselves BUT at cost to local ratepayers (including commercial park operators). These "frugal" travellers are always quick to tell the world how "self-contained" their vehicles are and how they don't need the services provided by such places as caravan and tourist parks. They are however, always on the lookout for freebies such as potable water, power to re-charge batteries and facilities at which to dump sewage waste. The later facility is in a large number of cases accompanied by the installation of a potable water outlet and it is this facility that is really the issue that is of importance to such persons.

When lobbyists such as the CMCA approach Local Governments to achieve such outcomes as RV Friendly town status, this is usually accompanied by very high leverage tactics in order to achieve their required outcomes. At the current time, this very thing is occurring in Warwick where the Council has virtually been told that if they do not provide what the CMCA is requesting, then they will not bring their Annual rally to the City. One could be forgiven for thinking of another word to describe this situation.

It is of great concern that at the end of this same paragraph, there is numeric reference to the CMCA Web Site. This Association hopes that the Committee has not already been subjected to the usual wish lists of these lobby groups. We were of the opinion that this Committee was keen to work with us as Industry providers and not with lobby groups who are end-users and who are in the exercise for what they can achieve.

I would be happy if you could attach the above additional statement to our existing submissions.

Many thanks,

Regards,

Tony Benson

Government Liaison Officer

9/06/2010

Caravanning Queensland

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Sub ~~37~~ 37
Part 3**Anne Fidler**

From: Tony Benson [tony@caravanqld.com.au]
Sent: Thursday, 6 May 2010 11:54 AM
To: Economic Development Committee
Cc: admin@caravanqld.com.au
Subject: Further information for inclusion in our Submissions
Attachments: Rural Communities left in the dark.pdf

Lyndel,

Further to my email of yesterday to the Committee.

I have just found out some very disturbing information which I think should be made available to the Economics and Development Committee. I think it is something that is central to the issue of grey tourism in Queensland. I hate to have to keep feeding you bits and pieces of information like this, but our industry is a dynamic one and things change on a daily basis.

I have just been informed that the issue of the rollout of digital television is going to have a significant impact on rural areas of Australia, including Queensland. (See attachment).

More to the point, what is NOT being talked about is the potential for the effect of this rollout on grey nomads as they travel throughout rural and remote areas of Australia and Queensland. As members of the Committee would be aware, the issue of Television reception is important to a great number of grey tourists (as well as tourists generally) and anything that has the potential to impact on tourism is something that should be looked at.

If the Committee should decide to look at this matter further, I am able to provide contact details of a man who is well-versed in this matter and who is only too happy to share his knowledge if requested. I would earnestly submit to you that this is a good thing for the Committee to consider if they are to address all the issues involved in grey tourism.

Regards,

Tony Benson

**Government Liaison Officer
Caravanning Queensland**

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6/05/2010

Digital television switchover could leave some rural communities in the dark

From 30 June 2010, Australia will gradually begin switching off the analogue TV signal, making way for digital transmissions.

Starting in Mildura, Victoria, the switchover will take place progressively on a region by region basis until 31 December 2013. It will deliver more choice and content, as well as better picture and sound quality, while also freeing up spectrum for the delivery of new and improved broadcasting and communications services, such as high speed broadband.

Minister for Broadband, Communications and the Digital Economy Senator Stephen Conroy says the switchover will bring remote communities in line with the rest of Australia, enabling them to access all free to air digital television services, including the original three commercial and two national channels, as well as new digital services such as ABC2, ABC3, SBS TWO, GO!, 7TWO and ONE HD.

However there have been mixed reactions from rural, regional and remote communities, as well as councils and industry stakeholders.

In order to view digital television, most households will simply need to purchase a digital set top box for their existing television set. But it gets a little more complicated for those living in rural or regional blackspot areas.

Currently, where services are not available from broadcaster owned and operated transmitters, many councils operate 'self help' retransmission facilities, providing access to commercial and/or national broadcaster analogue television services. But under the digital scheme, these facilities will no longer be able to retransmit the signals without being upgraded at an estimated cost of around \$160,000 per site.

According to a press release from Senator Conroy, broadcasters have agreed to carry out and fund the upgrade of around 100 of at least 600 self help sites. The Federal Government is working with broadcasters to select which sites to upgrade. Viewers in the selected areas would then only need to install a high definition set top box to access the full suite of digital television channels, in line with viewers in larger cities.



*Sunset Meadow retransmission facility at Isaac Regional Council.
Photo supplied by Mayor Cedric Marshall.*

However, with the final choice of sites up to the broadcasters themselves, it is likely to be only high density populations that are upgraded.

Senator Stephen Conroy said where analogue self help services are not converted by broadcasters or councils, viewers will have access to a direct to home satellite service. The Federal Government will fully fund and build a new digital satellite broadcasting service for rural access, but households will also need to install satellite reception equipment, including a dish and a digital receiver, at a cost of around \$600.

The Government will provide a \$300 subsidy to assist homes requiring the satellite service to pay for the required equipment. But most households today have a second or even third television set, meaning they would need to purchase additional set top decoders for each extra television, in addition to covering the costs of required cabling, antennas and so forth.

According to TV and radio transmitter specialists N-Com, this

could blow the costs out to approximately \$1,600 per household, rather than the \$600 the Government estimates. As such, Sales Manager at N-Com Glenn Welsh said the only feasible solution is for councils to upgrade their self help sites.

"If rural analogue sites are simply switched off, then there will be many very angry residents in rural communities right across Australia," he said. "Rural residents will direct their frustration at their local councils if they are forced to buy satellite receivers and dish antennas to receive what were previously free to air services."

Leader of the Nationals Warren Truss said the closure of the analogue television network will mean the death of local television content for thousands of Australians living in rural areas. He said the Government's plan to convert to digital only 100 of the existing network of at least 600 'self help' television transmitters will leave thousands of people living in country communities with blank screens when analogue transmissions close.

"The Government is offering these people a new satellite service—one for Western Australia, one for Queensland and the Northern Territory, and one for the rest of Australia," Warren Truss said. "These new services will transmit regional news broadcasts in rotation, so some people in country areas will have to get used to watching their news service late at night or make a choice between local news and their favourite program being broadcast during their news slot."

"And what about local community service announcements, local advertisements, and special local programs?"

"Labor is spending \$66 million on advertising the conversion to digital. That amount of money alone would be enough to convert another 400 self help transmitters to digital. The analogue shut down program should guarantee that no Australian, particularly those living in regional and remote areas, will be worse off. Nor should the Government expect battling country communities to pick up the tab for their multi billion dollar analogue sell off windfall."

For further information about the digital switchover, visit www.digitalready.gov.au or call 1800 201 013.

[REDACTED]

[REDACTED]

Sent: Tuesday, 8 June 2010 10:18 AM

[REDACTED]

Subject: FW: Important addendum to Submissions by Caravanning Queensland to Joint Parliamentary Committee - Grey Tourism

[REDACTED]

[REDACTED]

[REDACTED]

Lyndel Bates
Research Director
Economic Development Committee

QUEENSLAND PARLIAMENTARY SERVICE
Parliament House
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Brisbane Qld 4000

Ph: 07 3406 7470 Fax: 07 3406 7070
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From: Tony Benson [mailto:tony@caravanqld.com.au]
Sent: Monday, 24 May 2010 11:10 AM
To: Lyndel Bates
Cc: admin@caravanqld.com.au
Subject: Important addendum to Submissions by Caravanning Queensland to Joint Parliamentary Committee - Grey Tourism

Lyndel,

Good morning.

I hate to be a pain in the neck but I want to ask you to place an Addendum to our Submission to the Economics and Development Committee because of something very important that has just happened in Western Australia.

I would appreciate if the following text could be added to Point 132 of our Submissions. Perhaps a new Point 132A might be the easiest course of Action...

Additional information follows:

Western Australia

9/06/2010

Land Tax – 100% Concession for Caravan Parks

The Legislative Assembly's Economics and Industry Standing Committee tabled a report on the *Provision, Use and Regulation of Caravan Parks (and Camping Grounds) in Western Australia* in October 2009. Among other things, the Committee found that further growth in land values had offset the value of the 50% land tax concession for caravan parks that was introduced in 2005, contributing to pressures on low cost tourism and family holiday accommodation.

Having regard for the Committee's recommendations, the Government has decided that the land tax concession for caravan parks should be increased to 100% (i.e. a full exemption) and, if a caravan park is redeveloped for an alternative use, the 'claw back' period for the concession should be increased from five years to ten years. The scope of the concession will remain in its current form, which excludes caravan park land used for accommodation such as chalets and cabins.

The estimated cost of increasing the land tax concession to 100% from 1 July 2010 is around \$1 million per year.

Source: Budget Paper No. 3,
http://www.dff.wa.gov.au/cms/uploadedFiles/State_Budget/Budget_2010_11/2010_11_budget_paper3.pdf

End of Additional Information.

Thanks Lyndel,

Regards,

9/06/2010

Tony Benson

**Government Liaison Officer
Caravanning Queensland**

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SUPPLEMENTARY SUBMISSION TO THE JOINT
PARLIAMENTARY ECONOMIC DEVELOPMENT COMMITTEE

Subject - Grey Tourism

August 13, 2010

EXECUTIVE SUMMARY

The Caravan Parks Association of Queensland Inc. (CPAQ) has previously furnished a submission to the joint Parliamentary Economic and Development committee in relation to Queensland's rural and regional communities through Grey nomad tourism.

CPAQ now seeks to tender a supplementary submission to this committee in relation to several other issues which have been raised in other submissions. This includes reference to data which is of questionable value.

In particular, we are concerned by the inaccuracies in one of the submissions and the suggestion that the amendments made to Section 48 and Section 52 of the Land Act ought to be revoked. The revocation of those amendments (and the consequential loss of the State's Caravan Park Policy - PUX /901/102) and the resulting un-regulated use of Reserves will inevitably result in the loss of caravan parks and will have a detrimental effect on tourism generally.

We seek to have this Supplementary Submission read in conjunction with our initial Submissions which are now before the Committee.

We support the application of the current DERM Policies as they relate to the Secondary Use of Reserve Land (including Showgrounds) in Queensland. These adequately address not only towns with caravan parks but also those that have no caravan parks and only community facilities and also towns with both caravan parks and community facilities. Indeed, the Policies of CPAQ actively support and promote the referral of tourist clients to community facilities under circumstances where for various reasons they cannot be accommodated in our member parks.

CPAQ submits that these current State Government Policies achieve a correct balance between meeting the needs of grey tourists whilst not impacting on the viability of existing commercial caravan and tourist parks in Queensland.

We also note the recent findings in the report prepared by the Department of Infrastructure and Planning titled "*Final Report on allegations raised against Barcaldine Regional Council – use of the Barcaldine showgrounds*" dated February 2010. **(See Annexure A).**

CARAVAN PARKS ASSOCIATION DATA - FACTS (Queensland).

To assist this inquiry further, we provide the following facts which relate to the operation of our member parks within Queensland:

- The average member park operator in Queensland has owned their business for a period of 11.39 years.

- Over 80% of park owners manage their own parks

- ***The average member park in Queensland has....***
 - 61.93 powered sites
 - 21.16 un-powered sites
 - 13.94 sites (suitable for big rigs longer than 9 metres)
 - 16.55 cabins
 - 5.17 on-site vans suitable for short-term hire

- The average annual occupancy rate for powered sites in Queensland is actually 48.87% (This is an average for the whole State and can vary significantly by Division).

- The average annual occupancy rate for un-powered sites in Queensland is 18.07%

- The average annual occupancy rate for cabins in Queensland is 55.51%

- Over time tourists have demanded a higher standard of on-site accommodation, other than that provided by on-site vans. Caravan parks have installed new cabins but not (as portrayed in other submissions) at the expense of tourist sites. In Queensland over 800 on-site vans have been replaced by cabins with additional demand not resulting in fewer available tourist sites.
- Cabins assist in the viability and survival of the park across the full twelve months of the year and particularly at times of non-peak season. Commercial reality is about survival of business.
- 58% of parks in Queensland accept clients with dogs.
- Approx 71% of member parks in Queensland have dump points.
- On average, member parks in Queensland employ 6.98 staff.
- Less than 60% of our member parks have actually experienced an increase in occupancy rates for their powered and un-powered sites in the past three years.
- 80% of our member parks in Queensland **HAVE NOT** reduced the number of available powered and un-powered sites in the past three years. This is in spite of statements made elsewhere in another submission based on statistics that fail to capture the whole industry.

STATE OF THE CARAVAN PARKS INDUSTRY – QUEENSLAND

The majority of member parks in Queensland are either on the market for sale or, given the right circumstances, the owners are prepared to sell.

CPAQ wishes to advise the Committee that there have been significant impacts upon the Parks industry in Queensland during the past three years.

Generally, the big impact issues have been increased charges for electricity, rates, Land Tax, Water and Local Government fees. Additionally, State Government charges to parks with their own sewage treatment plant have risen from \$500 to a minimum of \$5,400 to a maximum of \$10,600 per annum; an increase of 1000% to 2100% over a twelve month period!

Over the last ten years, the caravan park industry in Queensland has been solid. However, in the last three years particularly, increased costs associated with running a park have placed increased pressures on park owners.

Land Tax in Queensland continues to be a significant impost on the provision of resources to facilitate tourism within the State. In short, most other States and Territories of Australia have already identified the extent of damage to the Caravan Park industry that Land Tax causes and have taken steps to address the issue. **See Annexure B**

The un-regulated use of reserves on top of those increased pressures will inevitably lead to the closure of some caravan parks. In our experience, once a caravan park closes, it is lost forever (indeed there has been a steady decrease in the number of caravan parks in Queensland in the recent past).

In spite of erroneous statements that have been made in one of the other submissions concerning increases in income of 222% over a 12 year period for caravan parks, the facts are that there is a huge difference between the two terms “**Income**” and “**Profitability**”. A good example would be the Homestead Caravan Park at Barcaldine, whose selling price increased only 31% over the 12 year period 1995 to 2007. Not the 222% increase in value that one would have expected from the increase in income suggested by others.

Income is what is receipted; profitability is what is left after the costs of business operation are applied.

This Association would be more than willing to address these issues in detail if requested. It is “Profitability” and **NOT** Income, that determines the commercial value of a caravan or tourist park.

STAR RATINGS OF CARAVAN PARKS

In one submission, the author makes the statement that “The caravan parks offer four or five star facilities at four or five star prices which 70% of CCM travellers do not wish to use and prefer to stay at the one star facilities”.

The **real** situation as it relates to the Star rating of parks is that only 16% of the parks in Queensland are rated 4 star or above. The other 395 parks are rated 3.5 star or below.

There are also 185 non-rated parks in Queensland. In other words, only 16% of the parks in Queensland are rated four star or above. The facts are the opposite of what has been claimed. These facts do not support the inference that the majority of parks in Queensland cater for the luxury end of the market.

The above information can be found in the RACQ Touring Guide 2008-2009.

STATISTICAL DATA

We are concerned by the extensive reference to ABS statistics used in some submissions. We note that ABS statistics are of little (if any) value to this inquiry simply because those statistics **DO NOT include parks with less than 40 sites**. For the March quarter 2010, ABS surveyed two hundred and fifty-one (251) Qld. Caravan Parks, out of a total of four hundred and seventy-one (471). Only 53.3% of Queensland's largest Caravan Parks form the basis for many of the inferences made, and as such are not valid.

For these reasons, CPAQ urges this Committee to be very wary of submissions that show an over-reliance on ABS statistics to present emotive statements when making reference to this Industry and especially the lack of data to justify transposing Statewide trends to specific locations.

The only thing to be said about statistics as they relate to this Inquiry is that (at best), they are totally unreliable.

As previously outlined, ABS statistics (as they relate to the Caravan Park Industry), are of no use to this Inquiry simply because they do not address the whole of the Industry. Other submissions contain similar statements about the lack of reliable data so there appears to be quite a degree of consensus concerning this issue.

It is interesting to note that in the Inquiry into Caravan parks and Camping which was conducted by the West Australia Government in 2009, the following statement is of interest as it relates to ABS data....

“THE COMMITTEE IS CONCERNED THAT SO MUCH OF THE EVIDENCE PRESENTED TO THIS INQUIRY RELIES ON REPORTS THAT DRAW FROM THIS DATA WITHOUT FULLY APPRECIATING THE METHODOLOGICAL LIMITATIONS IN THE GENERATION OF THAT DATA”.(Chapter1 page 16-17)

The Web Address for the West Australia reports as published are as follows.....

[http://www.parliament.wa.gov.au/web/newwebparl.nsf/pgFrameset?openpage&fcontent=http://www.parliament.wa.gov.au/parliament/commit.nsf/\(ReportsAndEvidence\)/BA522F4E795BACB7C82576500014A920?opendocument](http://www.parliament.wa.gov.au/web/newwebparl.nsf/pgFrameset?openpage&fcontent=http://www.parliament.wa.gov.au/parliament/commit.nsf/(ReportsAndEvidence)/BA522F4E795BACB7C82576500014A920?opendocument)

QUEENSLAND LEGISLATION

Reference has been made in another submission concerning Sections 48 and 52 of the Land Act in Queensland. It has also been suggested (incorrectly) that the Caravan parks Association of Queensland has been responsible for changes to that Legislation.

What has not been said is that it was the former Department of Natural Resources and Water (now DERM) which advised the State Ombudsman that they were then considering an Amendment to the Land Act 1994 “which will provide that inconsistent uses by trustees (such as local councils) of reserve land require Ministerial approval. Under the amendment, the Minister will be required to assess the level of impact such uses will have on nearby businesses before granting an approval.”

This information can be read at page 55 of the annual report 2006 -- 2007 by the Queensland Ombudsman in his annual report to State Parliament.

See Annexure C

CPAQ wishes to simply state to this Inquiry that the issue of grey tourism in Rural and Regional Queensland is something that we consider as extremely important to Queensland.

We believe that our Policies (as previously submitted) go a long way to addressing some of the practical problems facing the industry.

What concerns (and damages) our Industry is that any action by Local or State Government towards the provision of free or heavily subsidised camping facilities in relatively close proximity to existing commercial parks is another

impost which this industry can ill afford; it is also another deterrent for the construction of new Parks.

What has been forgotten is that caravan parks have been built to the standards IMPOSED by Local and State Governments and are subject to ongoing fees and charges. We have to build the facilities, recoup charges and make a profit. If Caravan Parks are as profitable as stated by some submissions, why aren't new ones being built?

The question for this inquiry could well be:-

“What are all levels of Government doing to help ensure Caravan Parks are able to continue to offer affordable holiday accommodation.”

We do not want to see any Government community facilities used “inappropriately” . The unregulated use of those facilities would diminish our members ability to provide for and promote tourism both Nationally and Internationally.

We support the application of the current DERM Policies as they relate to the Secondary Use of Reserve Land (including Showgrounds) in Queensland. These adequately address not only towns with caravan parks but also those that have no caravan parks and only community facilities and also towns with both caravan parks and community facilities. Indeed, the Policies of CPAQ actively support and promote the referral of tourist clients to community facilities under circumstances where for various reasons they cannot be accommodated in our member parks.

CPAQ submits that these current State Government Policies achieve a correct balance between meeting the needs of grey tourists whilst not impacting on the viability of existing commercial caravan and tourist parks in Queensland.

Tony Benson
Government Liaison Officer
Caravanning Queensland

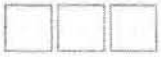


COPY

Final report on allegations raised against Barcaldine Regional Council's use of the Barcaldine Showgrounds

February 2010

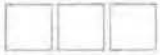
Departmental investigation of allegations raised by N.W. and F.E. Barnett about the Barcaldine Regional Council's operation of a commercial caravan park at the Barcaldine Showgrounds.



Contents

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1. Introduction	1
2. Background	1
3. Purpose and scope	1
4. Allegations	2
4.1 Use of Barcaldine Showgrounds for commercial purposes	2
4.2 Anti-competitive behaviour	3
4.3 Non-compliance with statutory requirements	4
5. Summary of findings	6
6. Recommendations	2



1. Introduction

The Minister for Local Government and Aboriginal and Torres Strait Islander Partnerships has received correspondence alleging anti-competitive behaviour, mismanagement and non-compliance with state policies by the Barcaldine Regional Council (council) relating to its conduct as operator of a commercial caravan park at the Barcaldine Showgrounds.

In addition, it was alleged that council has disregarded advice from the Department of Environment and Resources Management (DERM) with regard to the use of its trust land.

The Department of Infrastructure and Planning (the department) noted that the Ombudsman had previously investigated these allegations and subsequently recommended that council develop a formal policy for implementation during the 2007 tourist season to guide the showgrounds caravan park operations, with particular reference to maximum length of stays and conditions of use. The policy was to be consistent with the land's reserve status and should ensure the operations do not unfairly compete with private operators.

The Ombudsman also stated that the annual turnover of the caravan park operations was not large enough to trigger the competitive neutrality principles for public sector agencies.

The Queensland Ombudsman's 2006–2007 annual report highlighted the Barcaldine Caravan Park investigation and its subsequent recommendations and recorded that council did not accept the Ombudsman's recommendations in full.

2. Background

The *Local Government Act 1993* (LGA) provides the legal framework within which local governments must operate. Although the LGA provides local governments with autonomous responsibility for ensuring the good rule and government of their communities, it also sets out specific processes and powers which are available to the state government when monitoring and intervening in local government matters.

However, the department will not conduct a review or investigation unless there is sufficient cause to do so, and will not intervene where:

- complaints or allegations concern a frivolous or vexatious matter
- another public sector entity can more appropriately intervene
- complainants have a right of appeal or review that has not been exhausted and it would be reasonable to require the complainant to do so
- complaints and allegations do not give rise to possible serious or systemic failure by a local government.

Before approving an investigation, review or inquiry the Department of Infrastructure and Planning (the department) undertakes a preliminary assessment and reports to the Director-General. The Director-General must be satisfied that:

- the action is in the best interest of achieving capable, sustainable and accountable local governments and
- if the action is not undertaken, there is a real possibility that capable, sustainable and accountable local governments will be compromised.

3. Purpose and scope

The department considers that if proven, the alleged failure by council to give due consideration to the recommendations of the Ombudsman and other state agencies, may be indicative of a systemic failure which may diminish council's capacity to exercise its jurisdictional authority.



Similarly, the department considers that local governments should at a minimum operate enterprises in a manner consistent with the requirements imposed upon other commercial operators within their regional boundaries.

The terms of reference for the review were:

To undertake a review of the operations of Barcaldine Regional Council by:

1. reviewing council's caravan park operations including:
 - a. the use of council's caravan park for commercial purposes
 - b. allegations of anticompetitive behaviour by council
 - c. any licences or permits issued to Barcaldine Showgrounds caravan park including perceptions of inequality for private caravan park operators.
2. reviewing the operation of council's caravan park to determine if its operation is compliant with state and local requirements
3. making any recommendations in relation to the above issues.

This review included:

- a review of the correspondence submitted by the complainant
- a review of correspondence received from Barcaldine Regional Council dated 22 September 2009 in relation to this matter
- meetings with officers from the Department of Environment and Resource Management (DERM)
- telephone interviews with regional officers from DERM
- a review of Barcaldine Regional Council's response to the preliminary assessment report dated 5 February 2010.

4. Allegations

4.1 Use of Barcaldine Showgrounds for commercial purposes

It is alleged that the council is operating a commercial caravan park at the Barcaldine Showgrounds.

Assessment by the department:

The department noted from council's correspondence dated 22 September 2009, that:

"the showgrounds are closed to the travelling public when large events are held (e.g. the annual show)."

Accordingly, it is assumed the showgrounds caravan park is available to the travelling public at all other times throughout the year.

The department considers that accommodating caravans throughout the year, rather than only accepting caravans when the privately owned caravan parks are at capacity, would indicate that a commercial operation exists.

Additionally, it is noted that council collects monies from individuals who use the site. While the department has no objection to council charging reasonable fees for services provided through the community, the charging of fees in this instance would seem to be more consistent with the operation of commercial premises rather than the facilitation of a community use of a recreational reserve.



Council advised that the Barcaldine Showgrounds Caravan Park was established in the 1950s and was the original and only caravan park in the Barcaldine. It was established to provide camping areas for annual shows, camp drafts, rodeos, field days, car rallies as well as a minimal number of tourists.

Council states that whilst the showgrounds are open for camping for the majority of the year, primary users (ie show society, rugby league, rugby union, touch football, cricket, camp draft, rodeos, private functions and the Tree of Knowledge Festival) have priority of use. These activities create noise and light nuisances for campers who are required to share amenities with these activities. The showgrounds are closed to the public for the annual show.

Council states that it had charged a lower camping fee than the private operators but as a result of the Ombudsman's report it increased the camping fee to a benchmark rate charged by the commercial operators.

Council believes that these factors and the factors raised in item 4.2 should be taken into account when determining whether a commercial operation exists.

Findings:

In the absence of a council policy outlining the use of the showgrounds, these activities indicate that council is operating a commercial caravan park and camping ground at the Barcaldine Showgrounds.

4.2 Anti-competitive behaviour

It is alleged that council is operating in an anti-competitive manner in competition with two privately owned and operated caravan parks within the Barcaldine Regional Council area.

Assessment by the department:

This allegation was also examined by the Ombudsman who found that council's caravan park operations were unfairly competing with local private operators.

This includes the allegation that council is undercutting local private operators' pricing. It is alleged that council is able to undercut prices due to its use of public land at no cost and use of rates to subsidise the costs associated with infrastructure provision, staffing and cleaning.

Undercutting

The council advised by letter of 22 September 2009, that it had not to date developed or implemented a policy governing the use of its showgrounds as recommended by the Ombudsman.

However, council advised that it has implemented the following practices resulting from the Ombudsman's recommendations in relation to anti-competitive behaviour:

- council has ceased to offer a discount for week long accommodation and only applies a daily charge to camp
- benchmarked its nightly camping pricing to that of commercial operators
- painted over advertising signs on highways to Barcaldine and ceased promoting the Showgrounds Caravan Park
- not advertising the availability of the Showgrounds for camping in any publication or promotional material
- no longer has an on-site caretaker.

Council considers that it has taken all reasonable steps to ensure it is not acting in an anti-competitive manner since the release of the Ombudsman's report.



Findings:

Whilst the above practices will assist to address some of the concerns raised about council's anti-competitive behaviour, the department considers that without development of a formal caravan park policy and agreement with the private operators the steps above, on their own, will not fully address the problem of council competing in a commercial manner against local operators.

4.3 Non-compliance with statutory requirements

It is alleged that council is operating the caravan park without obtaining the necessary approvals and permits.

- **Compliance with use of reserve land**

Assessment by the department:

The Barcaldine Showgrounds is state land held in trust by the Barcaldine Regional Council as a reserve for recreation and showgrounds purposes. The council is operating a caravan park at the Showgrounds.

DERM policy on "Secondary Use of Trust Land" does not allow for the operation of a commercial caravan park on trust land.

DERM confirmed that the council is operating on trust land in a manner inconsistent with DERM's secondary use policy and is therefore operating the caravan park in a state of non-compliance.

Also, DERM's "Caravan Park Policy" provides that a reserve for recreation may be used for camping with the provision of limited facilities. The length of stay being restricted to no more than three nights. This policy also provides that a full scale caravan park with on-site accommodation, kiosk and full amenities is not consistent with a reserve for recreation.

Section 52 of the *Land Act 1994* allows for a trustee to apply to use trust land for a purpose inconsistent with the purpose for which the trust land was dedicated. A trustee application of this nature can be approved if DERM is satisfied that inconsistent action will not diminish the purpose for which it was dedicated **or adversely affect any business in the area surrounding trust land.**

DERM advised that applications of this nature are acceptable if there is no other caravan park/s in the locality, or the existing caravan park/s do not have the capacity to meet the needs of customers and are used as an overflow facility that does not affect local commercial operators. Local governments wishing to utilise this provision would be required to submit a land management plan with their application for approval.

The policy clearly articulates that these provisions for showground reserves can be utilised if there are no caravan parks in the locality, or the existing caravan park does not have the capacity to meet the needs of customers.

The department has been advised that council sought advice from DERM about acceptable uses of the Barcaldine Showgrounds. By letter dated 23 July 2009, DERM advised council that (as per previous advice to council in 2005) any decision in relation to the restricted use of the showgrounds as a caravan park would be dependent on local circumstances. Council would also be required to have management plans in place with those plans requiring community consultation if caravan park use was to be allowed. DERM also advised council that caravan park use of the showgrounds could **only be contemplated if used as an overflow facility and if not in competition with commercial facilities.**



DERM also advised that it had never taken action against a non-complying trustee under the *Land Act 1994* and that there were no penalty provisions contained in the Act for this offence.

Council has acknowledged the DERM policy on "Secondary Use of Trust Land" and the requirements of this policy for management plans to be in place to allow consideration by DERM for the use of the showgrounds as a caravan park.

Council advised that previous attempts to prepare a showgrounds management plan did not proceed. In 2009, council resolved to establish its own Showgrounds Management Plan committee and invited representatives from the local caravan park owners, tourism operators, the Campervan and Motorhome Club of Australia (CMCA), local businesses and council to be members of the committee.

It was also stated that the first meeting of this committee scheduled for January 2010 had been delayed pending the department's final report on this matter. Council advised that its intention is to have a showgrounds management plan in place by 30 June 2010 and that an application to DERM would be made at that time.

Findings:

The above assessment confirms that the Barcaldine Regional Council is not complying with its Barcaldine Showgrounds trustee lease at this point in time.

- **Compliance with council's own local laws**

Assessment by the department:

The department notes that council's local law No.21 (Caravan Park Operators) (LL21) requires that any person/operator of a caravan park must have a permit issued by council.

Council advised in its correspondence dated 22 September 2009 that it has not issued itself a permit to operate a caravan park.

Council has identified that it does not issue itself with a permit to operate a caravan park under LL21 as:

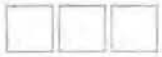
- it is not the primary use of the showgrounds
- public use of the showgrounds takes precedence at all times
- the showgrounds are closed to the traveling public when large events are held e.g. annual show
- the facilities at the showgrounds are public use facilities
- there are no defined caravan park sites or on site vans at the showgrounds
- the provisions of LL21 appear to imply exclusivity over that area of land to a caravan park activity which is not the council's intention for the operation of trustee land.

The department examined LL21 and its application to the council in relation to the requirement for "any person/operator of a caravan park" to hold a permit.

It was considered that the definitions in Section 4 of LL21 provide that "a person must not operate a caravan park unless authorised by a permit under this Part. Maximum penalty of 200 penalty units".

Section 3 of LL21 defines a "caravan park" as a place for parking caravans including a place that provides also for complementary accommodation, on a commercial basis.

The department was therefore of the opinion that council is required to hold a permit pursuant to LL21 because it meets the definition of a person operating a caravan park.



The council is therefore in breach of Section 4 of LL21 unless it is authorised by permit to operate a caravan park on the site.

Council's comments about exclusivity of use are not a requisite element of the definition of operation of a caravan park under LL21 and is therefore not relevant.

Following consideration of the department's preliminary assessment of this matter, council advised that it will apply to itself for a permit to operate a caravan park in order to comply with its local laws. Council's contracted Environmental Health Officer (EHO) will assess the application to ensure it meets council's requirements. The EHO will be instructed to ensure that the conditions of the permit are consistent with those applying to the local commercial operators.

Findings:

Council is currently operating the caravan park in the Barcaldine Showgrounds in contravention of Local Law 21.

5. Summary of findings

Following a review of all the information to hand together with the council's response to the preliminary findings, the department is of the opinion that council is operating a commercial caravan park:

- **at the Barcaldine Showgrounds**
- **in an anti-competitive manner**

Whilst it is acknowledged that council has taken positive steps in an attempt to address the concerns raised about council's operation of a commercial caravan park in an anti-competitive manner, it remains that without development of a formal caravan park policy guiding the use of the showgrounds as a caravan park, these steps on their own, will not fully address the problem of council competing in a commercial manner against local operators.

The department is of the opinion that whilst council's proposal for a management plan committee (which would include the local operators) will assist with development of a management plan, the proposed committee should also be tasked with developing a policy to guide the caravan park operations (conditions of use etc.) at the showgrounds. This would go a long way to addressing the concerns raised.

In developing this policy for operations outside the showgrounds trust status (primary users) and in addition to those issues already addressed by council (advertising, fee benchmarking etc), the following considerations should also be given:

- maximum stays and conditions of use
 - compliance with DERM's secondary use policy (ie operations do not compete unfairly with commercial operators and the showgrounds are used as an overflow facility to avoid undue competition.)
- **on trust land in breach of the *Land Act 1994* and DERM's policies**

Council has acknowledged it is operating a caravan park in breach of the *Land Act 1994* and DERM's policy on secondary use of trust land.

Again, the establishment of a showgrounds management plan committee tasked with development of a management plan and formulation of a "conditions of use" policy will support an application to DERM for restricted use of the showgrounds as a caravan park.
 - **in breach of its own LL21.**

Council has acknowledged that it requires a permit under its local laws to operate a caravan park and has commenced the process.



6. Recommendations

It is recommended that the Minister write to:

- 1) the Barcaldine Regional Council advising of the above findings and requesting immediate action to:
 - establish the proposed Showgrounds Management Committee (to include the local commercial caravan park operators as members) to review the use of the Barcaldine Showgrounds and develop a management plan and formulate a policy governing the use of the Barcaldine Showgrounds as a overflow caravan park
 - bring the use of the Barcaldine Showgrounds public land into compliance with the *Land Act 1994* and DERM's policies on secondary use of the site
 - ensure that the resultant use of the Barcaldine Showgrounds site is compliant with its local laws
 - advise the Minister of its decisions in relation to these recommendations.
- 2) the complainants providing a copy of the final report and advising of the above recommendations.
- 3) the Minister for Natural Resources, Mines and Energy and Minister for Trade providing a copy of the final report and requesting any assistance DERM, as the administering agency, can provide to Council to bring the use of the Barcaldine Showgrounds Trust land into compliance with the requirements of the *Land Act 1994* and DERM policies.

ANNEXURE C

LAND TAX (CARAVAN PARKS) – ALL STATES OF AUSTRALIA

QUEENSLAND

- Applicable generally across industry unless there is at least more than 50% permanent residency situation in the park.

NEW SOUTH WALES

- No land tax applicable in “over 50’s” parks
- Not applicable in parks in relation to a particular section of the park where that particular section is an “over 50’s” section.
- In all other cases it is fully applicable

WESTERN AUSTRALIA

- Not applicable.
The Government has recently decided that the Land Tax concession for caravan parks should be increased to 100% (i.e. a full exemption) and, if a caravan park is redeveloped for an alternative use, the “claw back” period for the concession will remain in its current form, which excludes caravan park land used for accommodation such as chalets and cabins. (Budget Paper No. 3 , 2010/2011).

SOUTH AUSTRALIA

- Not applicable

VICTORIA

- Not applicable

TASMANIA

- Applicable generally across the industry

NORTHERN TERRITORY

- Not applicable

CASE STUDY

PUBLIC CARAVAN PARKS: UNFAIR COMPETITION OR COMMUNITY BENEFIT?

Background

During the year, we received several complaints in relation to the Barcaldine and Blackall Shire Councils using public land (in particular the town showgrounds) for low-cost caravan parking. The complainants were owners of licensed private caravan parks.

Caravan parking facilities have historically been quite limited in both towns. Due to the growing number of visitors with caravans, the councils have allowed the use of the town showgrounds and other public land for caravan parking and camping.

The annual influx of visitors during the peak winter tourist season is a major source of revenue for the local communities, and the councils have been anxious to ensure that visitors are encouraged to stay in the region as long as possible. Providing low-cost caravan parking facilities is one way the councils have sought to achieve this.

The complainants, whose caravan parks were more recently established in the region, believed the councils' activities were undermining their businesses' viability as fewer visitors were choosing to stay with them, opting instead for the cheaper prices and more limited facilities of the public showgrounds.

The complainants also claimed that while they were required to pay rates and charges and operate on a for-profit basis, the councils did not have these burdens and instead could subsidise caravan parking operations from their general funds.

Investigation and findings

Based on our investigation we concluded that limited caravan parking and camping (for example, during annual shows) is a legitimate secondary use of public land. There is no doubt that the visitors contribute to the local economy and the councils are justified in encouraging them to stay.

The annual turnover of the caravan park operations in Barcaldine and Blackall was not large enough to trigger the

competitive neutrality principles for public sector agencies. Both councils had also exercised their right not to apply the Local Government Code of Competitive Conduct to their caravan parking operations.

However, we formed the view that before engaging in commercial activities on public land or using public property, councils should consider the effect the activities may have on local businesses, particularly in remote communities.

Councils in these situations should be careful to strike an appropriate balance between ensuring essential services are provided to residents and visitors and entering into competition with properly licensed local businesses, potentially undermining their viability.

Accordingly, we recommended the councils review their caravan park activities with a view to ensuring they do not compete directly against local private operators.

In response, the Blackall Shire Council entered into a co-operative agreement with the complainant to manage the caravan park trade in town. The Barcaldine Shire Council did not accept our recommendations in full, as the council was of the view that there were few, if any, statutory limitations on the use they could make of the town's showgrounds for caravan parking.

We did not agree with this view and requested that council review its decision due to the effect the operations were having on nearby private licensed caravan park operations. Our opinion was that, while legal, the extent of the Council's caravan park operations meant that council was unfairly competing with private park operators.

The Department of Natural Resources and Water has since advised us that an amendment to the *Land Act 1994* is being considered, which will provide that inconsistent uses by trustees (such as local councils) of reserve land require Ministerial approval. Under the amendment, the Minister will be required to assess the level of impact such uses will have on nearby businesses before granting an approval.