

Free camping and public access dump points

Background

Our Association has no issue with the principle of “free camping”, provided it occurs in areas that comply with all relevant regulations, and when it is allowable under law.

There are numerous places throughout the State where compliant free camping is available.

We believe it's important that a full range of services and experiences be available in the caravan and camping sector, so that it can continue to appeal to such a broad and growing market.

Everything from free compliant sites in pristine natural environments to fully equipped holiday parks!

We celebrate the growth of the RV industry and its increasing popularity, especially amongst the retiree market. It's a terrific way for people to experience the best of NSW/Australia.

Key facts

- NSW State government legislation sets stringent laws under which commercial caravan parks need to operate. These laws help ensure the preservation of the environment and the safety of guests/customers.
- Caravan parks in NSW are required under law (i.e. their approval to operate) to have a dump point if they are in a location that is connected to sewer.
- In instances where small outback villages provide water/dump point facilities, Councils are likely providing these because there is no small business operator or caravan park in town providing the service.
- Governments at all levels normally provide services when there is market failure – i.e. something is not being delivered because it is not being financially viable for commercial businesses to provide these services.

There is no such thing as a free dump point or water service

- RV users create waste that needs to be discharged responsibly as they continue on their travels, to ensure that the pristine natural environment is maintained.
- There is a cost for the installation, ~~monitoring~~, maintenance and insurance of dump point and water facilities used by travellers.

Received by *Ms Lyndel Gray*

Date: *26 / 8 / 2013*

Resolved to publish Yes / No

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- These costs need to be funded by someone – be it a caravan park operator, a local council via its ratepayer contributions or another provider.
- It is correct that dump points are properly designed facilities intended to receive and appropriately dispose of wastewater from RVs to the local sewage system. Therefore, the resources needed to ensure their proper function can be significant. The Environmental Protection Authority (EPA) issues environmental protection licenses (EPLs) to local sewage operators. These operators, which are the local councils in many smaller towns, are responsible for what goes into their systems to make sure they are able to comply with the requirements on their licence. They are required to actively manage the potential for inappropriate discharges to sewer systems and should have requirements in place to monitor discharges to dump points. They should also have security arrangements in place. Where licence holders manage the possibility of inappropriate substances being disposed of through contractual arrangements, this places further requirements on the host of a disposal point.

As indicated by the EPA, all EPL licence holders must comply with the conditions of their licence, prepare pollution incident response management plans; publish and/or make pollution monitoring data available, pay annual administrative fees and submit annual returns. The provision of a “free” and unsecured dump point increases the burden.

- The expectation that these facilities should be available to RV users free of charge is unrealistic – home owners pay for sewer and water services, and many local tips charge for the dumping of waste: why should RV users expect to be able to dump their waste free of charge?

Councils providing free services in competition with caravan park operators

- Caravan parks are very important small businesses in regional towns.
- However, it’s extremely difficult for small businesses to compete when services are being provided by local councils free of charge or deeply discounted.
- The local baker does not have to compete with councils giving away free bread to visitors, nor the greengrocer compete with them giving away free fruit and veg, so why does the small business caravan park operator have to compete with Councils giving away free or deeply discounted camp sites?
- Caravan park owners have invested significant capital into businesses that provide an environment that enhances the appeal of the local township.
- Caravan parks develop and maintain facilities that add to the visitor appeal of a destination.

- If they can't be provided an equal playing field, these small businesses will not be able to compete, and hence they will go out of business, with a resulting loss to the town of valuable tourism infrastructure.
- Small business caravan parks are also an important part of the local economy. They employ local people, pay local rates, and buy goods and services locally.
- Creating a business environment that allows local small businesses to flourish should be a priority for local councils.
- If Councils offer services for free in competition with local businesses it makes it extremely difficult for these small businesses to remain commercially viable.
- A recent study demonstrated that for every \$1 taken by a caravan park, \$1.38 in economic benefit flows on to the local economy.
Source BDO/CRVA study – fact sheet available.
- Another recent study demonstrated that commercial campers spend an average of \$576 per stay compared to an average of \$213 spent by free campers. This means commercial campers inject 2.7 times more money into the local town than free campers.
Source BDO/CRVA study to be released

Non-compliant campgrounds and potential environmental impacts

- Free dump points/water provision can be the catalyst for the establishment of non-compliant caravan parks.
- Non-compliant, non-approved caravan parks have been known to spring up around dump point facilities without regulations to ensure environmental protection, nor with any of the mandated safety requirements under which commercial parks need to operate to safe guard their guests.
- The ongoing maintenance of the facilities and rubbish removal creates a significant cost impost on the local community, with ratepayers funding the cost of services delivered by the Council.
- Dump points within a secure caravan park environment provide added vigilance to guard against the potential misuse of facilities, which can lead to environmental degradation. The dumping of substances such as formaldehyde is extremely damaging to waste systems as well as the wider environment.
- Discharge of grey water from sinks, laundries and showers via hoses under vans and RVs will increase nutrient loads into local waterways causing significant algal blooms including Blue

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Green algae (Cyanobacteria) which is known to be toxic to humans and cause death in wildlife, stock and domestic pets.

- Compaction of soils from stationary large vehicles and vans contributes to erosion, soil degradation and silt accumulation in waterways.
- Flora and fauna are at risk through loss of habitat and damage/attack from domestic pets accompanying campers. Compliant camp grounds engage pet policies to avoid such issues.

Recent Council Decisions

- Following it's receipt of information on options to improve RV facilities in the Ballina Shire to encourage greater visitation and associated tourism benefits, in March 2013 Ballina Shire Council resolved not to support the provision of free camping and dump point facilities within the Shire due to the negative impact this may have on existing licensed operators. The preferred option was to support existing accommodation providers.

Council's Tourism Section believed that the RV market would continue to visit the Ballina Coast & Hinterland regardless of a dump point or RV friendly status and that it was difficult to justify the provision of infrastructure when there is no readily available measure to account for the economic benefit of this market.

- On request from Tweed Shire Council in February 2013, Destination Tweed reported on the benefits and constraints of Tweed Shire joining the CMCA RV Friendly Town Scheme. Destination Tweed concluded that the key tourist markets that contribute to the tourist economy in Tweed are not the RV tourist and that its focus is on higher yielding markets - those that come to the region for longer stays, pay for accommodation, eat out and spend money within the community.

The risk of RV's from pulling into free spots at 5pm, using the facilities that would be supplied free of charge, before heading out at 7am the next morning to head to their next destination without actually having spent a cent in the region, was highlighted.

It was also noted by Destination Tweed that the full costs involved to become RV friendly would be burdened by the Tweed Shire Council and funds would need to be allocated in order to achieve at a minimum the essential criteria. Because these facilities are already provided successfully by the private sector, at no costs to the rate payer, it would arguably be better for Tweed Shire Council to encourage private investment and development.

About Us

We are the Caravan, Camping and Touring Industry and Manufactured Housing Industry Association of New South Wales Ltd. The Association is made up of caravan and holiday park

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businesses, manufactured home communities, caravan, camping and RV dealers and manufacturers, manufacturers of homes and those that provide services to these industries.

This gives us the collective strength of more than 640 caravan, camping, RV, Holiday Park and manufactured housing businesses throughout NSW. We actively work for members to encourage and promote the use of touring products, caravan parks and manufactured home communities across government, businesses and the general public.

Disclaimer

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Printed: Wednesday, 21 August 2013

