

ATTACHMENT TO AGENDA ITEM

Ordinary Meeting

20 May 2014

Agenda Item 8.1 Free Camping and Provision of Caravan Waste Services

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**BIG4 Shepparton East Holiday Park**

An Independent Member of
BIG4 Holiday Parks of Australia Pty Ltd

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2nd April 2013

The Board
Tourism Greater Shepparton
Po box 110
SHEPPARTON VIC 3632

Dear Board members,

COPY

Re: Proposed designation of RV Friendly Town site

We understand that the Board of Tourism Greater Shepparton is currently considering a proposal put forward by one of its members to propose to the Greater Shepparton City Council the option to designate a site within Greater Shepparton as an RV Friendly site [ie free camping].

We are totally opposed to this proposal, because of the potential negative business impact on our caravan park and all caravan parks in this municipality.

We operate to provide affordable accommodation to all travellers. Each year we must meet critical accreditation standards forcing us to comply with a raft of legislation that includes OH&S, CFA fire safety requirements, Council health regulations and the Residential Tenancies Act that sets out park owner responsibilities, and associated building, plumbing, laundry, garbage, waste removal and lighting requirements, just to name a few. Meeting these regulations ensures that our guests have a safe and enjoyable time while they are staying with us.

In addition, all caravan park owners pay rates, taxes and all statutory fees and charges imposed by local Council, the State and Federal Governments.

We hold that all providers of accommodation should operate under the same compliance system to ensure a level playing field.

To that end, the *Trade Practices Act 1974* provides for "competitive neutrality between government and private business activities". This competitive neutrality requires that Government business activities should not enjoy net competitive advantages over their private sector competitors simply by virtue of public sector ownership. In other words, Councils cannot advantage their own business over the private sector.

Just as we pay our rates, taxes and all statutory fees and charges, so must the Council.



Council must also factor in the costs associated with the following:-

- Initial capital purchase of the land for the RV site
- Town planner fees
- Council building and planning permits
- Installation of the dump point
- Installation of septic tanks
- Maintenance of septic tanks
- Installation of water
- Maintenance of water, taps, pipes etc
- CFA emergency management procedures
- Council emergency management procedures
- Waste collection
- Public Liability Insurance

According to the principles of competitive neutrality, Council must accurately cost these services on the basis of a full cost reflective price. In other words, Council must pay the same for these services as would a caravan park operator in the same circumstances.

Councils who act outside of these competitive neutrality guidelines leave themselves wide open to potential legal action.

As we live in a “user pays” society, we wonder whether the residents of Greater Shepparton will accept an increase in their Council rates to cover these incurred costs of offering free camping, especially in light of the recent council rates review strategy.

Waste collection is a major issue in relation to free camping sites, as is the policing of the site, with payment of both borne from our Council rates. We wonder how Council proposes to police the area from October to April every year when backpackers from all over the world converge on Greater Shepparton for the fruit picking season. This would not be a good advertisement for Shepparton. We also wonder what time limits will be placed on free camping and how the Council will police those lengths of stays?

We as caravan park owners support our local retailers by not only directing our visitors where to shop, eat and drink but also by purchasing all of our supplies locally. In basic terms, the more recreational vehicles that stay in our caravan park, the more toilet paper, soap, linen etc we require – this is all purchased from local suppliers. We also use local tradesmen for not only our repairs and maintenance but also all of our extensions and improvements which we have continually made over the years.

We also provide much needed employment options within our area. Our park alone provides employment for ten staff who all spend their wages locally with other local businesses.

With the State industry average being 52% vacancy rate for sites, there are plenty of available sites in caravan parks like ours to house all types of recreational vehicles.

The notion that offering free camping will increase tourism and spending in retail outlets is deeply flawed. According to the most independent and validated research conducted by BDO Australia this year, for every \$1 spent by free campers, guests in caravan parks spend \$4 – that's four times as much money being spent in the local economy.

Any data provided by the CMCA has never been independently researched and/or validated.

With the fantastic family activities and attractions that Greater Shepparton has to offer, we should be concentrating on attracting the family market to stay. It is well known that the spend from families is far greater than that of the "grey nomads" who are generally self-contained and utilise only the supermarkets and areas with free wireless internet such as the library.

No-one has a right to expect either a free holiday or a rent free life and our Council rates should not be spent on giving out freebies.

Our Council rates would be far better spent in maintaining, expanding and marketing our current family attractions and continuing to attract the events, arts and sports visitors, rather than just cleaning up after free campers.

We look forward to your early thoughts on this matter.

Yours faithfully,

KAYE & KYM BERNARDI

Cc Carrie Donaldson

Greater Shepparton City Council	
File No	
Record No	
13 MAR 2013	
Referred To	
Copies To	

To Mr Gavin Cator , C.E.O. Greater Shepparton City Council
06.03.13

I am writing to you as a long term resident and ratepayer of Shepparton. My husband and I have resided in Shepparton for the last 46 years, and have recently acquired a caravan with ensuite to enable us to travel around this beautiful country self sufficient. On returning from one such excursion we were disappointed to find re our travel guide that there were no dump points in Shepparton. We couldn't believe it, there was one in Cobram, one in Tatura and one in Yarrawonga. And yet with a city of our size not one to be found. We cannot access any in the caravan parks as we were not staying in them, we are wondering if this issue could be discussed at your council meeting. We are very sure that it would be an asset to our city, most of the towns and cities that we visited had a dump point located near to the information centre. We are hoping that you will give this matter some thought, and we look forward to hearing what your response will be.

Yours Sincerely,

Glenda and Anton Burtina

358 Archer Street,

Shepparton. 3630

Phone 58221326

Mayor Jenny Houlihan
 Greater Shepparton City Council
 Locked Bag 1000
 SHEPPARTON, VIC, 3632

Greater Shepparton City Council	
File No	
Record No	
18 NOV. 2013	

12 November 2013

Hi Jenny,

I have recently returned from the USA, where I always look for what is happening in the US, and looking for trends that will follow through to us in Australia over the following years. On this trip we used a Motor Home and experienced the facilities and the services provided as we travelled 6,500 kilometres through 10 States.

As Australia's population ages, the use of Caravans and Motor Homes will increase. SHEPPARTON has a great opportunity to capitalize on this group of people and capture some of the dollars they spend as they move through our region. We need to be ahead of the race so to speak, and some Cities have already seen the opportunity and embraced the needs of this group of travellers. See attached list from "Camps Australia Wide Booklet"

The first item is adequate parking close to the CBD. This must be easy in and out for large vehicles, and sufficient to ensure that there are ample spaces available, at all times, as many travel in groups. The information Centre needs to be easily accessible to these travellers and have maps of these parking places for hand out, and should provide a first 2 hour free coupon to display on the windscreen. This socio economic group are in the mid to high income, and have disposable dollars to spend in our town. If we make the experience of visiting and parking easy, they will stop over and spend in our City. These people are self-sufficient in their travel units, but do require facilities to take on water and dispose of waste, if these facilities are not available, they simply drive through town to the next available point, and in turn stop and spend in that town. This service must be FREE. This service could be provided by private businesses, and Council should assist them in implementing such facilities.

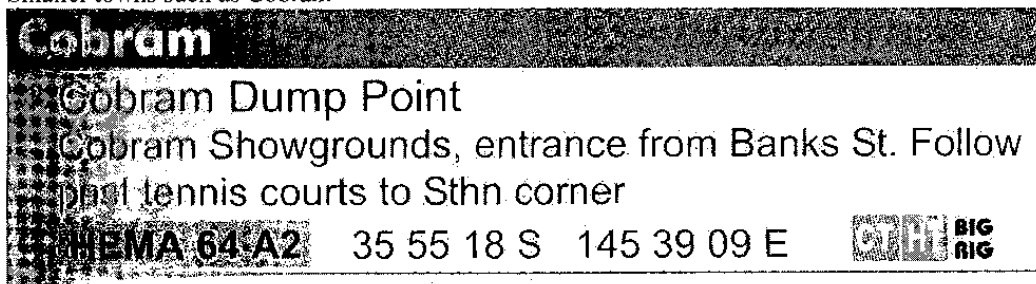
Now, I know most Caravan Parks would say they have these facilities, and these travellers can pay to use them. This is simply not the case, most of this group are conscious of the cost, they worked hard and know the value of money, and as such will vote by moving to the town that next provides these facilities. A lot of this group want to stop for several days, and have spent the money on their "rigs", and as such are self-sufficient and need some where to stop that is pleasant and can provide temporary parking (3 days max) and water and waste facilities.

Can Shepparton provide these, and how quickly?

The information Centre has had much debate. I believe it should be located prior to entering town where there is adequate large space parking with easy in and out access, and WELL sign posted. Travellers can then obtain the necessary information and plan their visit to our City, taking into account the suitable parking for their vehicle.

In the future we will see even larger vehicles and particularly if the maximum 8'6" width rule is changed, (this would allow a standard wooden pallet two wide in a semi). The US standard Motor Home width is now 8'6", once this rule is changed we would see an influx of 40+ foot Motor Homes being imported. This is the choice of retirees wanting comfort, self-sufficiency, and luxury. Are we ready?

Smaller towns such as Cobram



have already embraced this group and have waste disposal and overnight facilities, should we sit back and wait or be pro-active now.

I ask that a committee be formed within the next 60 days to report back to Council on how this can be implemented and Shepparton can benefit from this group of well healed tourists.

Shepparton is the greatest place to live, let's make it even better.

Kind Regards,

Ken Muston.
0418 575 065

Victoria		
<p>Ararat</p> <p>Ararat Dump Point Alexander Ave HEMA58C7 37 16 49 S 142 56 00 E CT HT AHS</p>	<p>Donald</p> <p>Donald Lakeside Caravan Park (03) 507 7164 See also Victoria site 368. 2 Corack Rd. 1 km N of PO HEMA62J7 36 21 52 S 142 59 16 E CT HT</p>	<p>Horsham</p> <p>Horsham Dump Point Firebrace St, outside Caravan Park HEMA58J5 36 43 21 S 142 11 58 E CT HT AHS</p>
<p>Avoca</p> <p>Avoca Caravan Park (03) 5465 3073 See also Victoria site 379. Lobby St. 1.2 km W of PO. Dump is outside caravan park HEMA59C9 37 05 35 S 143 28 06 E CT HT AHS</p>	<p>Eagle Point</p> <p>Eagle Point Caravan Park (03) 5156 1183 See also Victoria site 33. Camp Park Rd. 12 km S of Bairnsdale. Opposite Reception HEMA65H6 37 53 31 S 147 40 53 E CT HT AHS</p>	<p>Kaniva</p> <p>Kaniva Caravan Park (0458) 687 054 See also Victoria site 472. Caravan Park at Kaniva. Baker St. Dump is near Dungey St gates. Public access HEMA62J2 36 22 54 S 141 14 25 E CT AHS</p>
<p>Benalla</p> <p>Benalla Showgrounds (0407) 094 805 See also Victoria site 408. Holmes Rd. 2 km N of PO HEMA63K10 36 44 18 S 143 16 23 E CT HT AHS</p>	<p>Girgaree</p> <p>Girgaree Town Park See also Victoria site 398. Corner of Winter & Station St. Dump beside hall near toilets HEMA63J12 36 23 53 S 144 58 48 E CT HT AHS</p>	<p>Korumburra</p> <p>Korumburra Showgrounds Dump (03) 5655 2326 Point Victoria St. Rear entrance gate, next to toilet block. Key must be collected from Caravan Park in Bourke St. Deposit required for key HEMA63V10 36 40 S 145 49 02 E CT HT AHS</p>
<p>Cann River</p> <p>Cann River Caravan Park (03) 5158 6369 See also Victoria site 5. 7536 Princes Hwy, just W of Cann River Bridge HEMA65G12 37 33 59 S 149 08 46 E CT</p>	<p>Heathcote</p> <p>Heathcote Dump Point (03) 5433 3121 Barrack St, outside of Queen Meadow Caravan Park HEMA59B13 36 55 20 S 144 42 47 E CT HT AHS</p>	<p>Kyabram</p> <p>Kyabram Dump Point (03) 5852 2883 Fauna Park Road, off Lake Rd. Next to toilet block. Obtain key from Fauna Park office HEMA63J12 36 19 16 S 145 02 52 E CT</p>
<p>Charlton</p> <p>Charlton Travellers Rest (03) 5491 1043 See also Victoria site 340. 43-45 High Street HEMA65J8 36 16 06 S 143 21 03 E CT</p>	<p>Heyfield</p> <p>Heyfield RV Rest Stop (0418) 108 011 See also Victoria site 42. 700m SE of Heyfield Post Office, cnr MacFarlane & Clark Sts. HEMA64N6 37 59 06 S 146 47 15 E CT HT AHS</p>	<p>Lakes Entrance</p> <p>Lakes Entrance-Gippsland Lakes Fishing Club See also Victoria site 31. Opposite Information Centre, Bullock Island Rd HEMA65H8 37 52 58 S 147 58 18 E CT HT AHS</p>
<p>Cobram</p> <p>Cobram Dump Point Cobram Showgrounds, entrance from Banks St. Follow past tennis courts to S turn corner HEMA64A2 36 55 18 S 145 39 09 E CT HT AHS</p>	<p>Heywood</p> <p>Heywood Dump Point Hunter St East HEMA58G3 38 07 51 S 141 37 57 E CT HT AHS</p>	<p>Leongatha</p> <p>Leongatha Apex Caravan Park (03) 5662 2753 14 Turner St. 800m N of PO. Fee for non guests HEMA57K14 38 28 18 S 145 56 52 E CT S</p>
<p>Corryong</p> <p>Corryong Dump Point Next to toilet block at Saleyards, Donaldson St (School Lane) HEMA65B8 36 11 17 S 147 53 56 E CT AHS</p>	<p>Holland Landing</p> <p>Holland Landing Dump Point (03) 5142 3333 Holland Landing Rd. Near public toilets at the Jetty HEMA64N7 38 03 13 S 147 27 36 E CT AHS</p>	<p>Lorne</p> <p>Lorne Dump Point (1300) 891 152 Behind Lorne Visitors Centre. Turn into Otway St, follow road towards the spit. Dump is on the RH side at 2nd toilet block HEMA59J11 38 32 06 S 143 58 37 E CT AHS</p>
<p>Dimboola</p> <p>Dimboola Riverside Caravan Park (03) 5389 1416 2 Wimmera St. 200m S of PO HEMA62M4 36 27 25 S 142 01 29 E CT</p>	<p>Hopetoun</p> <p>Hopetoun Rest Area See also Victoria site 559. At Rest Area 1 km NE of Hopetoun HEMA62G5 35 43 21 S 142 21 53 E CT AHS</p>	

Victoria	Public Dump Points	Tasmania
<p>Macarthur</p> <ul style="list-style-type: none"> Macarthur Recreation Reserve ☎(03) 5576 1113 ☑ See also Victoria site 488. 700m S of town off Port Fairy - Hamilton Rd, entry to reserve just S of river crossing. Signposted [HEMA58[G4] 38 02 17 S 142 00 26 E CT HT NS 	<p>Port Albert</p> <ul style="list-style-type: none"> Port Albert Parking Area ☎(03) 5886 4382 ☑ See also Victoria site 85. Parking Area Wharf St, near boat ramp [HEMA66[H6] 38 40 22 S 146 41 38 E CT NS 	<p>Sunshine</p> <ul style="list-style-type: none"> Sunshine 7 Eleven Service Station ☎(03) 9310 2694 Western Ring Road, Northbound. Take truck lane, past diesel pumps. Marked as Bus Effluent point [HEMA52[G4] 37 48 16 S 144 48 16 E CT NS
<p>Maffra</p> <ul style="list-style-type: none"> Gippsland Vehicle Collection ☎(03) 5147 3223 1A Sale Rd. Access by arrangement [HEMA64[U5] 37 58 24 S 146 59 05 E CT HT NS 	<p>Rosebud</p> <ul style="list-style-type: none"> Capel Sound Foreshore Reserve ☎(03) 5886 4382 Port Nepean Rd, entry at section B just N of Elizabeth Ave. Near amenities block 3 [HEMA66[U7] 38 21 49 S 144 52 24 E CT 	<p>Sunshine 7 Eleven Service Station</p> <ul style="list-style-type: none"> Sunshine 7 Eleven Service Station ☎(03) 9310 2615 Western Ring Road, Southbound. Take truck lane, past diesel pumps. Marked as Bus Effluent point [HEMA52[G4] 37 48 16 S 144 48 33 E CT NS
<p>Mallacoota</p> <ul style="list-style-type: none"> Mallacoota Foreshore Holiday Park ☎(03) 5158 0300 ☑ See also Victoria site 3. [HEMA65[G4] 37 33 26 S 149 45 32 E CT HT NS 	<p>Rosedale</p> <ul style="list-style-type: none"> Rosedale Bowling Club ☎(03) 5144 6432 1 Dawson St. Near Wood St [HEMA64[U5] 38 09 21 S 146 46 49 E CT 	<p>Swan Hill</p> <ul style="list-style-type: none"> Swan Hill Showgrounds ☎(03) 5144 6432 Entry via Bradbrooke Ave. Left of the Grandstand [HEMA63[U7] 35 20 20 S 143 22 04 E CT HT NS
<p>Mildura</p> <ul style="list-style-type: none"> Mildura Dump Point ☎(03) 5018 8450 Benetook Avenue, between 11th & 14th Sts. Front of council depot, opposite TAFE [HEMA62[A4] 34 12 17 S 142 10 06 E CT HT NS 	<p>Sale</p> <ul style="list-style-type: none"> Port of Sale ☎(03) 5146 4364 Canal Rd, behind Council office. Cassettes only, access via steps behind toilet block [HEMA64[U6] 38 06 45 S 147 03 46 E CT 	<p>Tatura</p> <ul style="list-style-type: none"> Tatura Park ☎(03) 5146 4364 Leslie St, entrance opposite Davy St [HEMA64[C1] 36 26 44 S 145 13 58 E CT NS
<p>Mirboo North</p> <ul style="list-style-type: none"> BP Service Station ☎(03) 5146 4364 Ridgway St, Mirboo North. Key from attendant, fee if no fuel purchased [HEMA64[R3] 38 24 04 S 146 09 39 E CT HT NS 	<p>Sale Showground Caravan & Motorhome Park</p> <ul style="list-style-type: none"> Sale Showground Caravan & Motorhome Park ☎(03) 5144 6432 ☑ See also Victoria site 37. Sale-Maffra Rd [HEMA64[U6] 38 05 31 S 147 03 58 E CT HT NS 	<p>Warracknabeal</p> <ul style="list-style-type: none"> Warracknabeal Caravan Park ☎(04) 738 886 ☑ See also Victoria site 572. 2 Lyle St. Public access [HEMA62[H5] 36 15 11 S 142 23 13 E CT HT
<p>Nicholson</p> <ul style="list-style-type: none"> Nicholson River Reserve ☎(03) 5146 4364 ☑ See also Victoria site 32. Toilet block at boat ramp car park. Cassette only [HEMA64[U6] 37 49 02 S 147 44 24 E CT 	<p>Wellington Visitor Information Centre</p> <ul style="list-style-type: none"> Wellington Visitor Information Centre ☎1800 677 520 8 Foster Street [HEMA64[U6] 38 06 44 S 147 03 27 E CT NS 	<p>Warrnambool</p> <ul style="list-style-type: none"> Surfside Holiday Park ☎(03) 5559 4700 Pertobe St. Public access. Call first, fee for non guests [HEMA60[F2] 38 23 28 S 142 28 59 E CT HT S
<p>Numurkah</p> <ul style="list-style-type: none"> Numurkah Showgrounds ☎(03) 5146 4364 ☑ See also Victoria site 232. Enter via Timlock Rd [HEMA64[B1] 36 05 38 S 145 26 45 E CT HT NS 	<p>Seaspray</p> <ul style="list-style-type: none"> Seaspray Caravan Park ☎(03) 5146 4364 Foreshore Rd. Outside office, collect key [HEMA64[R6] 38 22 37 S 147 11 23 E CT HT NS 	<p>Warrnambool Showgrounds</p> <ul style="list-style-type: none"> Warrnambool Showgrounds ☎(03) 5155 0244 Koroit St [HEMA60[F2] 38 22 37 S 142 28 08 E CT HT
<p>Nyah</p> <ul style="list-style-type: none"> Nyah Recreation Reserve ☎(03) 5153 9500 ☑ See also Victoria site 286. River St, adjacent to Harness Club [HEMA63[E8] 35 10 18 S 143 22 53 E CT NS 	<p>St Arnaud</p> <ul style="list-style-type: none"> St Arnaud Sports Club ☎(03) 5495 1268 Dunstan St, off Charlton St Arnaud Rd, behind sports club [HEMA59[A8] 36 36 32 S 143 15 34 E CT HT NS 	<p>Wulgulmerang</p> <ul style="list-style-type: none"> Wulgulmerang Recreation Reserve ☎(03) 5155 0244 ☑ See also Victoria site 24. Snowy River Rd [HEMA65[E9] 37 04 06 S 148 15 37 E CT HT NS
<p>Paynesville</p> <ul style="list-style-type: none"> Paynesville Progress Jetty ☎(03) 5153 9500 Toilet block on The Esplanade [HEMA64[H8] 37 55 09 S 147 43 10 E CT NS 	<p>Stawell</p> <ul style="list-style-type: none"> Stawell Dump Point ☎(03) 5146 4364 Scallan Ct, near public toilets [HEMA58[C7] 38 03 15 S 142 46 52 E CT NS 	<p>Yarram</p> <ul style="list-style-type: none"> Yarram Recreation Reserve ☎(03) 5144 1989 Railway Ave, via Buckley St [HEMA64[H6] 38 38 25 S 146 40 25 E CT HT NS
	<p>Strathmerlen</p> <ul style="list-style-type: none"> Strathmerlen Dump Point ☎(03) 5146 4364 Murray Valley Hwy, lane behind toilet block. Opposite pub [HEMA63[G1] 35 55 33 S 145 28 46 E CT HT NS 	<p>Yarrowonga</p> <ul style="list-style-type: none"> Yarrowonga Showgrounds ☎(03) 5744 1989 Dunlop St. Collect key from Visitor Information Centre, Irvine Rd. Deposit required [HEMA64[A3] 36 01 03 S 146 00 32 E CT HT NS



VICTORIAN CARAVAN PARKS ASSOCIATION

Free Camping – the Industry Association position:

1. We seek a level playing field

- We support all efforts to introduce Australians to the fun of camping and caravan holidays, and to make our wonderful country accessible to both local and international residents.
- We agree with the principle of “free camping”, **provided** it occurs in areas that fully comply with all relevant regulations, and when it is allowable under law.
- We are not against competition, but our small business operators cannot compete when services are provided free of charge in direct and unfair competition by Councils
- Parks must comply with stringent laws in order to receive their approval to operate. These laws are designed to ensure the preservation of the environment and the safety of guests/customers. Cost of compliance is significant for business owners, and they have a right to expect that their competitors should also be required to be compliant with fire safety regulations, sanitation standards, lighting, road access and all the other requirements of a commercial caravan park.
- We seek a level playing field - the principle of competitive neutrality should be applied.
- We are not about forcing RV or other travellers into commercial caravan parks, but we believe that the demands of a small sector of the travelling public, who want free camping facilities and services to be provided by Councils in urban areas in direct competition with the commercial sector, are completely unrealistic.


2. Nothing is free

- The RV Friendly Town criteria requiring Councils to provide free overnight camp sites, dump sites and water needs to be revised. By all means we support the provision of big rig parking spaces within a town as well as other generic tourism services, but we do not believe Councils should be asked to provide overnight camp sites and services for free and in competition with small businesses.
- We believe the expectation of some RV travellers that overnight camp sites should be provided for free of charge when they travel is unrealistic. Councils, and ultimately rate-payers in the area, must pick up the cost of rubbish removal, cleaning, etc for visitors that demand these services free of charge.

- We believe that the expectation that dump point 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? We believe that asking local rate payers to pay for a free holiday for another group of visitors is un-Australian.
- Councils are being lobbied to provide free overnight camp sites, sewerage and waste disposal facilities, and water replenishment sources, to recreational vehicle (RV) travellers to entice them to visit their towns. Councils are being told that if they do not provide these services, then travellers will by-pass their destinations.
- In response, various Councils now allow free overnight camping within their districts despite the fact that there are already approved commercial caravan parks in operation. In many instances the required approvals have not been obtained.

3. Commercial tourism businesses must be supported to remain sustainable

- Small business caravan parks are an important part of the local economy. They employ local people, pay local rates, and buy goods and services locally. Independent research indicates that for every \$1 that is generated as revenue to the park from visitors, \$1.38 flows out into the broader business community of the town through the park's purchase of supplies and services.
- Additionally, independent research has shown that visitors to a commercial caravan park spend 3 times more at local retail businesses and tourist enterprises in town than "free campers".
- Commercial caravan parks and camping grounds already offer relatively low cost overnight camping options for travellers. In Victoria the price of sites might range from \$20 - \$40 each night outside of the peak holiday seasons which tend to be the times that retired RV owners travel.
- Provision of services for free, or at rates in the vicinity of \$10 - \$15 per night are usually not possible, nor are they commercially viable. Such rates do not reflect the business costs associated with maintenance, staffing, provision of water, electricity and sewerage services, and compliance with government regulation.
- It should also be noted that there are significant risk and liability issues faced by Councils when they operate and promote non-compliant facilities, and travellers face risks when an emergency occurs and there is no one nearby to offer assistance.
- Rather than competing with local small businesses, councils might consider investing in partnership promotions with local operators and tourism organisations and offering specially priced rates for specific periods or campaigns.
- Investing in such activities would also alleviate the need for councils to maintain their own facilities, and they could inject these costs into a partnership project and help drive visitors into established and compliant local tourism infrastructure.



Recreational Vehicle (RV) Friendly City – Implications & Considerations

Independent Report for
Geelong Otway Tourism

April 2013

BILL FOX & ASSOCIATES PTY LTD

Tourism Planning & Management Services

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Purpose of report

This independent report has been commissioned by Geelong Otway Tourism, April 2013.

The Recreational Vehicle (RV) touring segment (motor home, campervan or caravan) is experiencing significant growth, with local governments and communities experiencing both positive and negative impacts as a result. There is a renewed need for clear and consistent policy to guide decision making in order to effectively manage the arising issues.

This report will provide an independent assessment of the issues associated with the rapidly growing RV market and its requirements, along with the impact on local communities, existing businesses and Council infrastructure. It will also outline the legal obligations by Councils and the private sector in providing public facilities when catering for overnight stays.

Executive summary

The growth in the self contained Recreational Vehicle (RV) market has been substantial over the past 5-10 years due primarily to the number of part and fulltime retirees travelling beyond their home base. The international market travelling to primary tourist destinations in RVs has also increased significantly as have the variables in vehicle type and pricing.

There has been a growing trend for domestic RV travellers to seek free camping due primarily to the length of time away from their home base (many months) and the increased costs of staying in established commercial holiday parks. International backpackers are also on limited budgets, away for up to 12 months and predominantly free camp, often illegally.

The self contained RV market is represented by the Caravan & Motorhome Club of Australia (CMCA) with some 64,000 members. The CMCA actively lobbies both state and local governments for the development of RV camping parks with facilities, and members, whilst willing to pay a small fee for such, would prefer them to be free. They also lobby towns and cities to become RV friendly. The self contained RV segment (individually) generates relatively little economic yield other than spend on fuel and basic supermarket supplies.

The commercial holiday park owners have invested significant sums in developing and maintaining their parks to meet increasing consumer expectations as well as compliance with numerous local and state regulations and legislations. The cost of compliance with the Country Fire Authority Act is in excess of \$100,000 per park which is just one of many Acts they must comply with. A recent study found that on average each park contributed \$1.26m/pa to their local economy, not accounting for the flow on effect of tourists spending with other businesses in the region.

It is apparent that in the more remote townships around Australia the concept of RV Friendly Towns has merit and provides an economic model that is sustainable for the budget traveller while providing a modest economic generator for the local area. This is on the proviso that they are not competing in any way with an established holiday park. The solutions for the more remote towns and non-tourist destinations will differ greatly from the highly populated areas and regions where tourism is a primary economic generator such as the Geelong – Bellarine – Great Ocean Road Region.

Executive summary cont.

In agreeing to the development of RV parks, Councils need to be diligent in regards to their compliance with the national competition policy and the competitive neutrality principles. Where there are established commercial holiday parks, it is questionable that a Council could establish an RV park and meet their obligations under the competitive neutrality principles.

As the self contained RV segment is highly mobile, it is important that a region-wide approach is taken or the problem is merely shifted to the neighbouring municipality. Council by-laws, whilst a minor deterrent, are ineffective if patrols are conducted within normal office hours given the planned late arrivals into towns and early departures by the informed free campers.

It is important that in any decision-making around RV parks, Councils consult with their commercial holiday park owners given their significant investments and also the fact that they may offer viable solutions to the growing need to reach a compromise with those seeking an affordable stay.

Background

Many Australians have traditionally experienced camping holidays to the numerous coastal villages and generally relatively close to home, while few ventured to the outback. Those short but memorable camping and caravanning holidays were also relatively inexpensive as supply generally exceeded demand and legislative imposts on park owners were minimal.

However, as our population increased and land prices in the popular beachside villages soared, many of the popular beachside caravan parks were sold for significant sums and replaced with resorts, houses and units.

State and local government through necessity also placed quite stringent regulations on park owners in order to provide greater patron safety. The cost of compliance by park owners was significant thereby changing the business model to one of a much greater sophistication than ever before.

The past 10-15 years has also witnessed much greater freedom by the over 55 market segment with many purchasing a four wheel drive vehicle and caravan to travel Australia in their free time. This significant increase in travel to regional and outback Australia has generally had a very positive impact on tourism particularly along coastal villages, National Parks and the inland tourist destinations.

Not surprisingly, caravanning and camping have remained a popular pastime with the peak summer periods seeing many coastal areas and inland waterways near or at capacity for the month of January.

There has also been a substantial increase in the number of RVs traveling Australia and to our local tourism region. These vehicles range in size, but many are self contained with water, toilet and cooking facilities enabling them to be less reliant on the fully serviced and well managed holiday parks.

This self-reliance of many RV owners and hirers is also resulting in the growth of so called 'free camping' and the re-enforcement of the great Australian tradition of camping where we want to regardless of the season, the popularity of the destination or the local by-laws. Dedicated free camping internet forums and Smartphone apps have also contributed to the popularity of free camping areas.

Background cont.

Many RV owners are members of the strong and well coordinated national organisation, the Campervan & Motorhome Club of Australia (CMCA), who lobby governments on behalf of their members.

This report will focus on the self contained RV segment and provide a narrative that fully explores the issues associated with a growing market and the various demands being placed on Council (community) resources and infrastructure.

RV segments

It is important to differentiate between the main types of RVs that are circulating Australia and to describe their preferences.

International market

Budget RV segment (e.g. 'Wicked Campers') – These are the hire vehicle of choice of European backpackers who have a good appreciation of what Australia has to offer and are generally travelling on a limited budget. They have a strong preference for free camping, enabling them to spend more on adventure type experiences.

Up-market RV segment – These are usually widely travelled internationals aged 35-50, with a high disposable income, well informed of what Australia has to offer and enjoying reasonably long stays. They prefer to stay in holiday parks (well run, secure and at good locations), eat out and experience a range of activities and can be repeat visitors. This is a particularly high yielding market segment and one that most tourism destinations wish to attract.

Domestic market

Caravan/campers – There is a wide range of Australians who travel extensively throughout the country staying at holiday parks as well as free camping. They prefer the comfort and security a holiday park provides but to reduce costs they will also free-camp where appropriate. (The high cost of some holiday parks in Northern and Western Australia is also prohibitive for not so well off travellers who are away from home for several months. However, given the isolation and remoteness of much of Australia, free camping is perhaps appropriate as there is no disturbance to residents and many townships do not have commercial holiday parks.)

Self contained RV segment – owned by retired or semi retired people with a desire to see Australia at their leisure and have a strong preference for free camping. Many belong to the Campervan & Motorhome Club of Australia (CMCA) and enjoy the member benefits of a strong, well managed organisation who actively lobby both state and local government for the provision of facilities. The 64,000 members are kept fully informed by the CMCA via various digital platforms and have very active online forums. The CMCA has lobbied many Councils on behalf of their membership for the creation of RV Friendly Towns and the establishment of free camping areas. A quote from one of their publications:

'Currently the experience demanded by self contained RV tourists is not being matched by the existing network of infrastructure, services and information provided'.

Some members of this segment see free camping as a right; irrespective of population density, peak summer periods and the fact that they maybe in an iconic tourist precinct where everyone else expects to pay market price for the privilege. As stated in a number of their reports, another reason for avoiding holiday parks is that they also object to the possible noise and disruption caused by camping alongside active family groups.

Background cont.

CMCA definitions¹

RV Friendly Town – An ‘RV Friendly Town’ is one that provides amenities and services to the mobile traveller, and adheres to a number of criteria as determined by the CMCA. Among these, the CMCA advocates for the provision of free or low-cost camping services within proximity of a town centre. This no/low cost camping on Council land will require access to toilets, water, preferably power, blackwater dump pits and dog friendly.

Self-contained RVs – Self-contained RVs are motorhomes or campervans that have in-built eating, sleeping, food storage and preparation facilities, and also contain a toilet, shower and holding tanks for both grey water and black water, clean water storage, deep cycle batteries and a hot water service.

National perspective

Throughout Australia there are some 187 RV Friendly Towns with the majority being rural service centres and not primary tourist destinations. There are exceptions with Townsville being one of those. However the Townsville City Council is currently dealing with a number of issues in relation to free camping primarily related to large groups of vehicles parked within the city precincts creating unacceptable noise and community disturbance. (The noise is generated by groups gathering together at the end of the day along with that created by generators.)

Tasmania has recently completed a major review of RV camping and for further reading refer to the case study in *Appendix 1*.

The Queensland Government is shortly to commence a similar statewide study to assist Councils to manage non-commercial camping.

The basis for many regional centres enticing RVs to their area is on the assumption they, one day, may also become a tourist destination. A statement from the CMCA regarding the economic benefit RVs bring to regional Australia:

‘This may well be the last chance at injecting life back into small and struggling communities’.

It is understandable that in these more remote towns throughout regional Australia, RVs are made very welcome as they do contribute to the local economy i.e., fuel purchases. It is also likely that few of these towns would have a commercial holiday park so there would be no local objections to catering for this segment and no breach of the national competitive neutrality principles.

However in the popular tourist destinations where seasonality and supply and demand may dictate accessibility and pricing, Council by-laws will generally prohibit sleeping in vehicles in public areas.

¹ CMCA paper ‘The Self Contained Recreational Vehicle Market: 2010 and beyond’

Background cont.

Number of RV Friendly Towns per state:

New South Wales	41	(no tourist destinations, mainly inland towns)
Queensland	47	(with only two tourist destinations Townsville, Kuranda)
South Australia	27	(three minor tourist destinations)
Tasmania	27	(a third tourist destinations)
Victoria	23	(three tourist destinations mainly smaller more remote townships)
Western Australia	22	(mostly non-tourist towns).

State perspective

Victoria has 23 RV Friendly Towns with three of those being tourist towns: Beechworth, Yarrawonga and Heathcote.

However, as in most other states, the majority of these towns have a limited economic base, relatively small populations and little or no tourism appeal. Therefore the invitation to acquire RV Friendly status and an opportunity to enter the business of tourism sounds highly appealing.

Where there are no commercial holiday parks within and around these towns, some have taken the initiative and allowed camping in their local show grounds or recreational areas and have local arrangements with local sporting or service clubs to service these low key facilities.

The Melbourne City Council recently had an issue with backpackers sleeping in their vans in the long term out-of-hours parking areas along the Yarra River that were set aside to cater specifically for rowers. Whilst they have been effectively moved from that particular precinct, it is been suggested that the problem has simply relocated elsewhere.

Local perspective

The Geelong – Great Ocean Road region is one of Australia’s primary tourist destinations experiencing some 7.5 million visitors each year and growing. While holiday parks are under considerable pressure during January, access for the remaining summer and shoulder periods is less restrictive. Most holiday parks have also created overnight areas for those campers who arrive late without a booking and expect to be accommodated in mid January.

Over the past 3-5 years Geelong and the surrounding coastal areas has experienced an influx of RV travellers wishing to free camp. A drive around the more popular areas on dusk will see numerous vans circulating looking for a quiet location to spend the night before moving on to the next location early the next day to avoid detection. The coastal roadside stops between Torquay and Apollo Bay are the more popular sites well frequented by the illegal free campers.

Most holiday parks have very few campers between April to November with off peak non-power fees averaging \$25 per night and \$35 for shoulder periods.

Background cont.

CMCA Request for RV Park – City of Greater Geelong²

In order to accommodate the growing RV market visiting Geelong, the CMCA has been lobbying Council for a number of years to establish an RV park in the Seagull Paddock precinct and require the following services:

- Safe area to park
- Links with public transport into city centre
- Blackwater dump point
- Public toilet
- Access to water supply.

Note: All of these requirements are available in current commercial parks at a cost of entry.

Economic impact

Holiday parks

Commercial holiday parks account for approximately 12% of accommodation industry revenue and 9% of industry employment.

The Caravan, RV & Accommodation Industry of Australia Ltd (CRVA) commissioned a report in 2012 to evaluate the economic impact that commercial caravan holiday parks have on their region from the spending undertaken by the park and the park operators. The study found that on average, each park contributed \$1.26m to their local economy per year. The \$1.26m did not account for the flow on effect of tourists spending with other businesses in the region.

Other relevant data³ to the end of March 2012 includes:

- The number of cabins in holiday parks has doubled in the past 15 years
- Total industry turnover is approximately \$1.2bn
- 10,500 persons employed in the industry
- 1,614 tourist parks establishments with more than 40 powered sites
- 39,040 cabins
- 54% annual occupancy.

Self contained RVs

The economic contribution by individual Self Contained RVs⁴ is minimal with their major cost being the purchase of fuel and supermarket supplies. They may eat out once a week and prefer budget meals at RSLs and sporting clubs. CMCA membership advises that the economic value is enhanced by the total number of RVs travelling Australia. The CMCA data relevant to Self Contained RVs has not been used in this report as it also includes other recreational camping vehicles and caravans.

² This information has been provided by Mr. John Holliday representing the CMCA.

³ BDO 2012 Australian Tourist Park Industry Distinctively Different Insights: March 2012 based on ABS data.

⁴ Personal comment by CMCA spokesperson John Holliday

Background cont.

Social/community impact

The impact of non-conforming camping on communities varies considerably.

The situation in Townsville has reached the stage where the community has demanded urgent action by Council to address the noise and disruption caused by RVs congregating in the city centre.

Locally, residents are finding RVs camped on their nature strip or main streets with the number of incidents increasing to the point that action needs to be taken. Enforcement is difficult, as the campers know that if they arrive late and depart early they will escape the local by-laws officers.

The litter and human waste (a health hazard) being left in the car parks is also increasing significantly and becoming noticeable to local residents, particularly where there are no toilet facilities.

State legislation

The Department of Sustainability & Environment (DSE) is responsible for the Crown Land Reserves Act 1972 and Parks Victoria is responsible for National and State Parks prescribed under the National Parks Act 1975. DSE has delegated the responsibility to manage the coastal reserve areas on behalf of the state government to Committees of Management (CoM).

In the broader Geelong region there are a number of large caravan and camping parks managed by these committees of management including:

- Barwon Heads
- Breamlea
- Indented Head
- Lorne
- Ocean Grove
- Portarlington (900 sites)
- St Leonards
- Torquay (650 sites).

The primary Acts that Committees of Management must comply with include:

- Crown Land (Reserves) Act 1978
- Coastal Management Act
- The Land Act 1958
- The Local Government Act 1989
- The Country Fire Authority Act 1958
- The Occupational Health and Safety Act 2004
- The Environment Protection Act 19
- Residential Tenancies Act.

(See *Appendix 2* for complete list)

Background cont.

CFA requirements – There are very stringent requirements for commercial caravan park operators to comply with CFA regulations, with the cost of establishment and compliance in excess of \$100,000 for an average sized park.

Legal implications – competitive neutrality

There are both state and federal legislatures providing guidelines on competitive neutrality. The Victorian Competitive and Efficiency Commission (VCEC) is the body responsible to investigate complaints and report on competitive neutrality within Victoria.

The objective of competitive neutrality is to ensure that government business should not enjoy a net competitive advantage as a result of their public sector ownership. The aim is to obtain a fair market environment.

The competitive advantages of public ownership arise from additional costs which would be faced by a government business if it were a private firm. Using as an example a private caravan park operation, the additional costs would include:

- Compliance with relevant Acts and Regulations such as Health Act
- Town planning
- Payment of rates and taxes
- CFA requirements
- Occupational health and safety
- The cost of borrowings and;
- The requirement to earn a rate of return on an asset.

It is also required of the government body that its business costs are based on full service costing. Complaints brought before the VCEC Complaints Unit relate to the pricing of goods and services not being fully cost reflective.

Financial implications

Should any Council consider establishing an RV parking area they must first consider the cost implications of compliance with the competitive neutrality principles.

Establishment and maintenance costs will also be considerable and would need to cover:

- Provision of public toilets
- Provision of water supply
- Provision of black-water dump pits
- Compliance with fire regulations
- Provision and collection of rubbish bins
- Regular patrolling and maintenance.

Background cont.

The suggestion of fee collection using meters would require an honesty system which would most likely be unviable and would also require compliance and fee collection to be managed.

Risk analysis

Community – Given the past growth and anticipated growth in the RV market, it is highly probable that growth will continue at around 6% so doing nothing is not an option for any Council. The community backlash, environmental impact and safety considerations will require all Councils to address these issues. Furthermore, with the effective marketing of the Geelong- Great Ocean Road region, visitor numbers will continue to increase along with the numbers of those wishing to avoid camping in established holiday parks.

Business – In not addressing the issue of uncontrolled free camping, Councils also are disadvantaging established holiday parks who contribute significantly to the local and regional economies via employment and the purchases of local goods and services. All holiday parks have significant infrastructure investment which has taken many years to assemble and ensure compliance with state and local government regulations.

Fire – This region is also regarded as one of the countries' highest fire risk areas and where camping is not contained, that risk escalates considerably as numbers grow.

Competitive neutrality – Should any Council consider setting aside an RV area, they will need to fully comply with the same legislation as commercially run holiday parks as well as introducing full service costing. Any designated RV area would become a public asset, requiring day to day management and a set fee structure to provide some cost recovery.

Current issues

As a result of this burgeoning RV segment, many local Councils throughout Victoria and Australia are now faced with a number of issues including:

- Illegal overnight stays in heavily populated residential areas causing noise and disruption to residents
- The difficulty in enforcing local by-laws (sleeping in vehicles) due to the early departure and late arrivals of well informed free campers
- Litter and waste in roadside pullovers particularly where there are no public toilet facilities
- Refusal by many RV owners to use commercially run caravan and camping holiday parks where fees are charged and services provided
- The creation of 'RV Friendly Towns' and facilities with many Councils unaware of their responsibilities in complying with the National Competition Policy competitive neutrality principles of 'full cost attribution'

Current issues cont.

- Formal complaints to the Victorian Competition and Efficiency Commission (VCEC) by the Victorian Caravan Parks Association Ltd regarding some Councils providing free camping services where the viability of fully established and fully compliant parks is being compromised
- Lack of a coordinated approach at state government level to provide clear and consistent direction to local government (with the exception of Tasmania and Queensland).

Recommendations

1. Any decisions by local and state government regarding the setting aside of an exclusive RV area need to take into account the **competitive neutrality principles** and the need to fully comply with all legislature that applies to commercially run holiday parks.
2. Regional Councils must be consistent in the management of RVs otherwise the 'problem' may only be shifted. The G21 Regional Alliance is the appropriate forum in which consistency may be applied in the management of this issue. DSE and their Committees of Management would need to be consulted.
3. Considering that this segment of travellers (Self Contained RV Segment) will continue to expand, local commercial holiday parks could investigate the viability of setting specific areas aside and determining an appropriate fee for RVs during off peak periods (current average off-peak fee starts at \$24 per night). This arrangement could be promoted to RV owners thereby alleviating any excuses re affordability or access. It would also assist local by-law officers and police to offer a solution when moving potential offenders on. The sites could occupy the less attractive areas of the park and would need to provide sufficient space to accommodate the larger RVs. They would however, still require the use of services such as washing facilities, etc., after being self contained for several days.
(Note: The Great Ocean Road Coordinating Committee (GORCC) is currently considering a number of initiatives to address the situation of illegal camping on their numerous coastal reserves between Torquay and Lorne.)
4. Councils promote via their websites to RV owners/hirers that only stays in holiday parks are catered for in this region. This advice should also include the fact that demand will exceed supply during the month of January and that travellers should plan for stays outside the peak summer and school holiday periods.
5. That GOT, on behalf of member Councils, raise this matter VTIC (Victoria's peak tourism organisation) to discuss the matter with state government to consider a review similar to that undertaken by Tasmania. This would ensure statewide consistency and compliance by all Councils with competitive neutrality legislation but may also allow some towns to proceed with RV friendly status where competition is non-existent.
6. That GOT raise with Greater Geelong City Council the need for short term parking in the Central Activity Area to cater for visiting RVs.
7. That GOT develop an information package for RV owners and hirers and distribute via GOT digital platforms and through their visitor information centre network.
8. Non-payment of Council issued infringement notices for illegal camping by international travellers requires attention and could be addressed similar to that of car hire agreements regarding fines incurred for infringement of state road laws. This matter could be referred to VTIC to raise at state government level on behalf of GOT.
9. Should the City of Greater Geelong Council wish to proceed with investigating the establishment of an RV park, it is recommended that consultation with the commercial holiday park operators be undertaken in the first instance. This could readily be coordinated via Vic Parks.

Appendices

Appendix 1

Case Study – The Tasmanian Experience

Appendix 2

Legislation and Guidelines Applicable to Crown Land Caravan and
Camping Park Management under Committees of Management

Appendix 3

Consultations

Appendix 4

Abbreviations

Appendix 1**Case Study - The Tasmanian Experience**

Following formal complaints from holiday park owners in early 2011, the Local Government Association Tasmania prepared a Discussion Paper on the issue of recreation vehicles and overnight camping. A state government enquiry was held and the Minister for Local Government released the *Statewide Directions Paper - Review of Council Recreational Vehicle Overnight Camping Services* on 10 May 2012.

The Paper aims to assist councils in understanding how to apply competitive neutrality principles under the National Competition Policy when providing overnight camping sites for self-contained recreational vehicles (RVs). See the following link to the full report:
http://www.dpac.tas.gov.au/divisions/local_government/review_of_council_recreational_vehicle_overnight_camping_services

The CMCA response to the review included the following key points (verbatim):

- This paper will have a dramatic effect on Tasmanian Tourism, and its proposals have the potential to spread throughout the rest of the country once a precedent has been set in Tasmania
- The loss of free council rest areas in Tasmania will have dire consequences for RV tourists, the Tasmanian RV tourism industry and businesses throughout the state
- This will point out that if RVers are disadvantaged in Tassie they will travel elsewhere, and that will greatly affect the state's economy
- The proposal to remove or restrict the rights of travellers to enjoy the freedoms currently available in Tasmania will greatly discourage mobile tourists from visiting
- The CMCA's position is that councils should continue to be able to offer low cost and free services
- Exclude all self-contained RVs from any fees or levies incurred while staying in a council owned rest area.

Appendix 2**Legislation and Guidelines Applicable to Crown Land Caravan and Camping Park Management under Committees of Management**

Crown land managers appointed by the Minister for Environment and Climate Change are responsible for the management of Crown land under the following legislative frameworks:

- Land Act 1958
- Crown Land (Reserves) Act 1978
- Forests Act 1958
- National Parks Act 1975
- Alpine Resorts (Management) Act 1997
- Residential Tenancies Act 1997.

The following legislation and policies apply specifically to caravan and camping park management:

Planning and development

- Planning and Environment Act 1987 (and other local government planning requirements)
- Coastal Management Act 1995
- Victorian Coastal Strategy 2007
- Landscape Setting Types for the Victorian Coast (VCC 1998/2007)
- Siting and Design Guidelines for Structures on the Victorian Coast (VCC 1998/2007)
- Australian Building Standards
- Australian Safety Standards.

Managing a Crown land caravan and camping park

- Crown Land (Reserves) Act 1978
- Land Act 1958
- Local Government Act 1989
- Residential Tenancies Act 1997
- Residential Tenancies (Caravan Parks and Movable Dwellings Registration and Standards) Regulations
- Improving Equity of Access to Crown Land Caravan Parks
- Committee of Management Responsibilities and Good Practice Guidelines
- Plumbing Code of Australia 2004.

Occupational health and safety

- Occupational Health and Safety Act 2004
- Road Safety Act 1986
- Electricity Safety Act 1998
- Country Fire Authority Act 1958.

Country Fire Authority

- Caravan Park Fire Safety Guideline 2006.

Appendix 2**Legislation and Guidelines Applicable to Crown Land Caravan and Camping Park Management under Committees of Management** cont.**Managing for the environment and cultural heritage**

- Environment Protection and Biodiversity Conservation Act 1999
- Environment Protection Act 1970
- Native Title Act 1993
- Aboriginal Heritage Act 2006
- Victorian Heritage Act 1995
- Victoria's Native Vegetation Management: A Framework for Action 2002
- The Environmental Protection Authority's Code of Practice for Septic Tanks & Treatment Plants
- Traditional Owner Settlement Act 2010.

Running a small business

- Retail Leases Act and Regulations 2003
- Land Tax Act 2005
- Equal Opportunity Act 1995
- Occupational Health and Safety Act 2004
- GST Bulletin GSTB 2001/2
- DSE's Committee of Management Responsibilities.

Appendix 3

Consultations

Vin McKay	-	CEO Bellarine Bayside
Richard Davies	-	CEO GORCC
Steve Sodomaco	-	Manager Health and Local Laws CGG
John Holliday	-	CMCA Geelong Representative
Lynne Hultaine	-	Melbourne City Council
Officers Peers, Bickley, Ferrara	-	Geelong Police
Miguel Del Rio	-	Lessee Crown Land Caravan Park/private holiday park owner
Elizabeth White	-	CEO Victorian Caravan Parks Association

Appendix 4**Abbreviations**

CCG	City of Greater Geelong
CFA	Country Fire Authority
CMCA	Campervan & Motorhome Club of Australia
CoM	Committees of Management
CRVA	Caravan, RV & Accommodation Industry of Australia Ltd
DSE	Department of Sustainability & Environment
GORCC	Great Ocean Road Coordinating Committee
RV	Recreational Vehicle
VCPA	Victorian Caravan Parks Association
VTIC	Victorian Tourism Industry Council