



Submission  
Tablelands Regional Council:  
Proposed Planning Scheme  
Amendment No.5 of 2021

This submission has been prepared by AMA Clubs to support the Tablelands Regional Council on their commitment toward the RV and caravan sector.

Dear Tablelands Regional Council (TRC)

First of all, AMA Camps is thrilled with the proposal to change planning laws to allow private landholders to accommodate both self contained caravans and RVs on their properties throughout the region.

For many years now we've been working with local government across Australia to develop progressive policies to grow the sector by providing more options for families as they travel our beautiful country.

### **Who is AMA Camps**

Through AMA Camps landowners affiliate with the Association of Motorcycle and Automobile Camps Ltd (the NFP events company) and pay an upfront yearly fee. All campsite users join AMA Camps Pty Ltd (the membership company). Members book to camp through the AMA Camps website and pay the booking fee directly to the landowner. We stay out of the user/ landowner transaction altogether. Membership of AMA Camps Pty Ltd is \$50 for 2 years.

There are four to five different types of camps based on successful international examples.

#### **Home Camps**

Free overnight driveway or yard parking for your self contained RV. Make new friends and sleep soundly at an AMA Home Camp.

#### **Private Camps**

Campsites on private property that can accommodate a small number of caravans, motorhomes and tents. A more affordable way to get outdoors.

#### **Club Camps**

One of the main benefits of becoming a member of AMA Camps is the exclusive access you'll receive to our 'member only' sites. As soon as you stay on a club camp you'll be so pleased you joined. This is to do with the Association of Motorcycle and Automobile Camps Ltd securing and leasing land from Councils to establish our own campgrounds.

#### **Member Camps**

Properties owned by members for use by those members only. Share in the cost of buying land for camping and associated activities through an AMA Co-operative.

#### **Holiday Camps**

Camps for kids on school holidays to get outdoors and learn to drive and ride motor vehicles in off road areas.

AMA Camps is a part of the broader national AMA family. The Australian Motorcycle Association for example is a not-for-profit organisation representing the interests of motorcycle riders and club across the following sectors: adventure, enduro, motocross, trials, road, scooter and ATV / quad bike. The Australian Motorcycle Association is currently the fastest growing Association for the sector in Australia and known for having the most progressive insurance platform for riders; insuring hundreds of clubs and tens of thousands of participants annually.

In summary, we appreciate the challenges these changes pose the TRC. We are working daily with State agencies and local governments to design similar solutions. We've proven time and time again that managing access and building relationship through education is the key to success; not locking people out.

So again we applaud the TRC on this wonderful initiative and thank you for the opportunity to present this submission.

Kind regards

Daryl Petch

Director AMA Camps

# Our Views on the Proposed Changes

## **Economic benefits**

The broader economic benefits, brought about by spreading RV and caravan owners across the Tablelands, are clearly evidenced. The result of opening the market beyond fixed caravan parks results in a broader distribution of economic wealth and activity, to areas that would not necessarily benefit from fixed caravan park patronage. This outcome has to be good for smaller businesses dotted throughout the region.

## **Concerns raised by existing caravan owners**

We understand the concerns raised by existing fixed caravan park owners and licensees, however agree with the broader argument that with COVID and more Australians travelling internally, more options and increased competition is a positive outcome for everyone. Moreover, once implemented the concept will no doubt be promoted heavily and pull RV and caravaners to the area specific to take advantage of some unique, peaceful and less congested locations on private property.

## **Numbers of RVs and Caravans on site**

The changes generally allow for up to six self-contained RVs on-site at any one time without a development permit providing certain conditions are complied with. Council also highlight that in some areas 20 self-contained vehicles will be able to stay without a development approval, but they must be on a site that is two hectares or larger.

Our view on this is that there should be a defined calculation of allowable RVs and caravans based on the size of the property and number of sites offered by the landholder; as opposed to setting an arbitrary maximum number. We say this because in some instances a landholder may have a large property and four separate camp areas spread across hundreds of acres. On this basis the landholder may be able to accommodate six self-contained RVs at each location adding up to 24 RVs at anyone time. On this basis, arbitrarily capping the total number by property, regardless of property size and the number of camping options, doesn't seem to make sense.

## **Length of stay**

We agree with the maximum length of stay: 13 consecutive nights in the Rural Zone (Agricultural Investigation and Broad Hectare Precincts) and six consecutive nights in all other relevant zones. We believe that capping the length of stay is not only crucial but a sensible measure to ensure people don't take advantage of the program.

## **Nature Based Tourism - Infrastructure Charges**

We don't agree with the way the Council has gone about charging for these changes to a new Nature Based Tourism Framework. The Council stipulate the following:

“Council would continue to levy infrastructure charges for the use as it has done in the past. Infrastructure charges are a legislated funding mechanism whereby Council may collect monetary contributions from the proponents of development that is likely to place additional demand on Council's infrastructure networks. The monies are directed towards the upgrade and renewal of key infrastructure items identified by Council's Local Government Infrastructure Plan.”

## Our concerns?

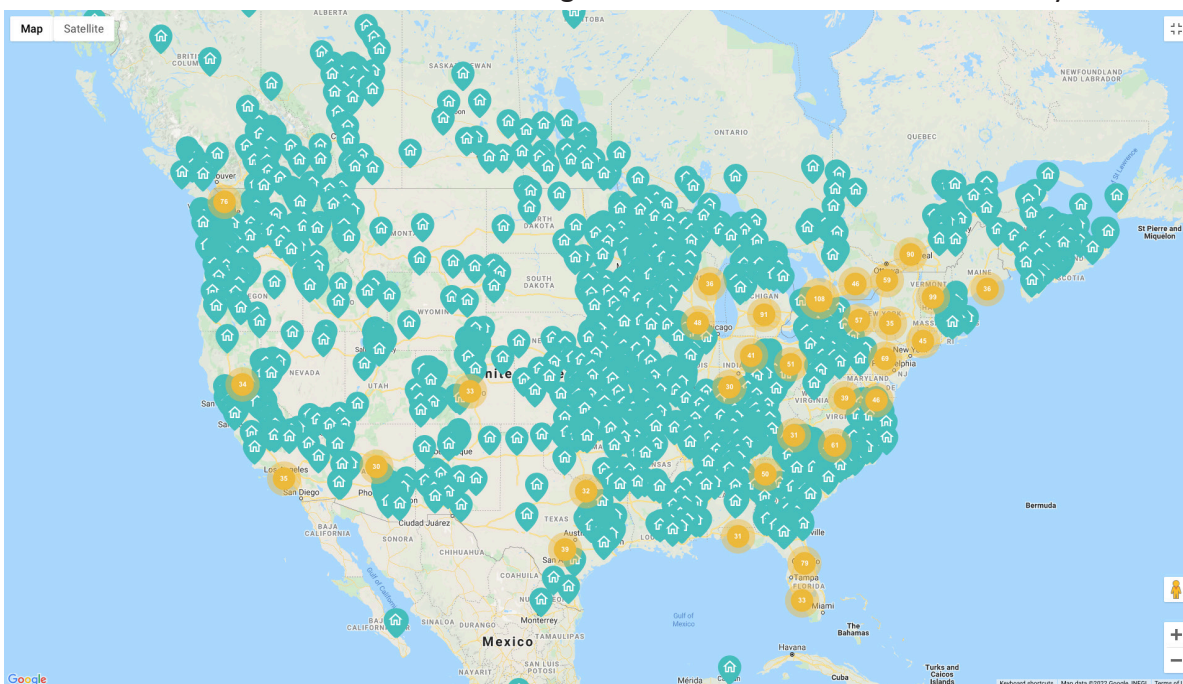
1. The TRC will need to clarify 'may'. Landholders wishing to invest and take advantage of these changes - including organisations like us - will want to know up-front, what the TRC will charge them prior to being apart of this program.
2. The proposal suggests Council 'may' collect monetary contributions from the proponents where an additional demand on Council's infrastructure is evidenced. What needs to be noted, is that we are talking about 'self-contained' recreational vehicles. Many of them can stay on the road for weeks without accessing local infrastructure like dump points.
3. Providing facilities like dump points free of charge helps ensure compliance and goes a long way to showing genuine support for the changes. In New Zealand, rules forcing all free-campers in campervans to be self-contained were welcomed, but local government failed to support the initiative with additional infrastructure solutions and policy innovation. Whilst campervans were legally obliged to have the mandatory 'self contained' sticker on the vehicle, campers were still forced to break the rules by parking overnight in shopping centre car parks. Local government failed to provide simple yet cost effective support - in this instance areas for campervans to park self-contained overnight - in return for the millions of dollars of additional revenue thousands of campervans brought to regions. The TRC can easily avoid making the same mistakes via simple yet cost effective solutions.
4. The TRC initiative will no doubt increase economic activity across the region. In our view the economic benefits will outweigh any need to charge additional fees. The TRC needs to accept that a cafe owner does not start to charge for the use of their toilets when they increase their clientele by 50%. They gratefully take the additional revenue and invest in additional infrastructure. They don't penalise those spending money in their cafe.

In saying this we accept the TRC note:

"This means that the majority of Nature Based Tourism uses would only attract charges for Council-controlled roads and public open space, in which case the charges would be reduced (from \$2,500 to \$750.00 per accommodation site."

## Environmental concerns

Allowing private landowners to accommodate self-contained RVs and caravans isnt a new concept. It has successfully been implemented around the world and has posed few concerns in areas where environmental regulations are strict. The below map is of thousands of private properties that allow self-contained RVs and caravans in North America. There is a strong focus on environmental sustainability and the model works.



## TRC partnering with AMA Camps

In our view the first step is zoning and ensuring the concept of self-contained RV and caravanning sits within a flexible yet compliant planning regime. The second element which is often missing is the linkage between the initiative and ongoing support from Council to grow the idea.

Other Councils around Australia are also reshaping planning regimes to accommodate these very same ideas. This has allowed App based booking systems to take hold of the changes and work with landowners. But there is one element always missing: there is rarely if ever a 'value-add' or educational component.

Local Councils have a genuine role to play in supporting the likes of AMA Camps to make these initiatives work. In our view the partnership should not cease at the point of planning changes. We'd like to see the likes of the TRC work with us, to explore how we can make these changes even more exciting and economically more successful for the region and your communities.

### How does this look?

AMA Camps already works with landowners; but having a more strategic approach with the TRC, with a broader infrastructure, marketing and tourism plan, would be amazing. For example:

- Liaise with us so we can promote, through our national network, local events throughout your region. Let us promote jazz festivals, agricultural shows, wineries, breweries, art galleries etc, on a consistent basis; thereby bringing people to your region from across the country.
- Rather than just have an App based 'booking system' - which is what everyone has these days - work with us to educate campers on environmental issues. Let's talk about the environmental uniqueness of the Tablelands. In our view, engagement, relationship and ongoing education is the key.
- Our alliance with TREAD Outdoors is an amazing partnership and a great example of what can be achieved. TREAD Outdoors works with traditional Indigenous owners and Land Councils to secure preferential access to key camp areas on traditional lands. TREAD Outdoors has a certification process and all members must display a TREAD Outdoor sticker with a unique number linked to their registration. Poor behaviour means that member lose access all together; there are no exceptions.
- Moreover, whilst TREAD Outdoor members secure exclusive access to traditional land, traditional owners are asked through the initiative to run cultural awareness programs for campers. It's an amazing connection where traditional owners share what 'country' means to them to camping families and their children. Doing so builds relationship and ensures camp sites are left clean for the next traveller.
- In our view, similar ideas and programs around Indigenous history and culture - and not just exclusive to Indigenous people - to link campers with the Tablelands region can also be developed by the TRC.

### Summary

Again congratulations on this initiative. You have our full support. We will now reach out to landowners and continue to work with the TRC to ensure this is a success. We would therefore value any ideas you might have or wish to pursue to make this an even bigger success for your community.

