PLAN OF MANAGEMENT

for the

SILVER SANDS HOLIDAY PARK (Part of Reserve 82910 for Public Recreation)

for

NSW CROWN HOLIDAY PARKS TRUST





November 2015

This Plan of Management for Silver Sands Holiday Park (part Reserve 82910 for Public Recreation) prepared for NSW Crown Holiday Parks Trust & Department of Primary Industries – Lands is adopted in accordance with Section 114 (1) – Crown Lands Act 1989.

3.3.16 (Date) (Signature)

The Hon. Niall Blair MLC, Minister for Primary Industries and Minister for Lands and Water

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report prepared by

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A note to the Evans Head local community, businesses, organisations and visitors to the region

On behalf of the Board of the NSW Crown Holiday Parks Trust and our management team I am pleased to present for your consideration this Plan of Management for the Silver Sands Holiday Park.

In June 2015, the Minister for Lands and Water, the Honourable Niall Blair MLC announced the appointment of a new Board of Directors to oversee the NSW Crown Holiday Parks Trust on behalf of the people of NSW.

The Trust was formed to consolidate the operations of twenty six coastal and eight inland holiday parks and reserves located on Crown Land throughout NSW in some of the State's most iconic locations.

Under the Crown Lands Act (1989) (the principal Act governing the administration of Crown Land in NSW) land resources are to be shared equitably in accordance with the principles of environmental protection, conservation and ecological sustainability, public use and enjoyment as well as encouraging multiple use of the land.

The Trust Boards' role is to set the framework and oversee the management of and provide accountability for these holiday and recreational reserves which are enjoyed by hundreds of thousands of domestic and international visitors each year and are an important part of local and regional communities and economies. This role is particularly relevant given the competitive recreational and tourism market and complex regulatory requirements facing holiday parks not only in NSW but also throughout Australia today.

The Board recognises the economic, environmental and social importance of Crown Land to local communities and to the State. It also recognises the ongoing need to improve existing facilities and develop new ones, providing for the sustainability of Crown Land assets for the benefit of the people of NSW - now and into the future.

The Board understands that the ongoing use and management of Crown Land is an important issue for local communities. It is committed to ensuring that local communities and other stakeholders are well informed about plans for the upgrade of Holiday Parks and public recreation areas in their area which come under the management of the Board.

It is important for local communities to be aware of the need to plan for the sustainability - both economically and environmentally - of that Crown Land.

This Plan of Management for Silver Sands Holiday Park details the Trust's proposals to ensure the sustainability of the Park in the longer term. Improvements have been designed to provide for the longevity of the Park, for the convenience and comfort of its users and to continue to meet safety and other regulatory requirements, as well as recognising the role of the Park in the local community.

In preparing the Plan, the Board has ensured relevant feedback from the community and stakeholder groups following the exhibition of a Draft Plan of Management in 2014 has been considered.

Some of the key aspects of the Plan of Management include:

- Dedication and upgrade of public recreation area in the centre of the reserve providing a direct connection between the town centre and the Evans River
- Provision of new community facilities in the community reserve including pathways, playground and BBQ facilities
- Relocation of the main park entry and reception to the central precinct to alleviate traffic congestion that occurs at the current location
- Establishing a separate entry to the riverside precinct of the park removing vehicles from the central public recreation precinct
- Development of the riverside precinct to provide fully services sites and waterfront cabins
- Provision of reliable and functional infrastructure and services
- High quality and functional amenities and communal facilities
- A mix of accommodation types with scope for additional accommodation in the future
- Larger sites, some with capacity to accommodate motorhomes and large vans
- Improved road networks with improved access on to sites
- Compliant wheelchair accessible accommodation and facilities
- Efficient and functional receptions, entry and exit points
- Providing more car parking within the park and less reliance on street parking

It is the Board's belief that Holiday Parks that are well designed and managed have the best potential to support local economies and communities. Silver Sands Holiday Park has been part of the Evans Head community for many decades. However, in order to keep pace with forecast user need, regulatory and safety requirements and maintain competitive standards it is essential that the Park undergoes continuous improvement. The directions outlined in this Plan of Management will underpin the sustainability of the Holiday Park into the future. In doing so, it will also ensure the Park is able to provide needed funding for recreation facilities, community infrastructure and environmental projects in local reserves and ultimately provide a continuing sustainable economic and environmental asset for the community, visitors to the region and the people of NSW.

Yours sincerely

Wendy Machin Chair NSW Crown Holiday Parks Trust

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- **Appendix A** Survey Diagram Proposed Consolidation of Existing Lots
- **Appendix B** Section 68 Approval to Operate a Caravan Park

DRAWINGS

SS – 01	Silver Sands Holiday Park – Existing Site Plan
SS – 02	Silver Sands Holiday Park – Proposed Development and Improvement Plan
SS – 03	Silver Sands Holiday Park – Proposed Development and Improvement Plan - Central Precinct and Riverside Precincts
SS – 04	Silver Sands Holiday Park – Concept Plans for Proposed Facilities

REFERENCES

1 PREAMBLE

1.1 Introduction

This Plan of Management has been prepared in accordance with the provisions of the *Crown Lands Act 1989* to provide a framework for the future management, use and improvement of the reserved Crown land and property known as the Silver Sands Holiday Park at Evans Head in the Richmond Valley Council local government area. The Crown land covered by the Plan comprises a community resource in a coastal setting that provides holiday accommodation and recreation opportunities for the enjoyment of the community. The land to which the Plan applies is indicated in Figures 1 and 2.

The Plan of Management outlines a management direction for the next 5 to 10 years for the reserved land in accordance with the requirements of the *Crown Lands Act 1989*.

1.2 Land Status

The Holiday Park occupies part of Reserve 82910 for Public Recreation which was originally gazetted on 18th November 1960. The North Coast Accommodation Trust was appointed on 25th February 2011 to manage the land addressed by this Plan of Management and was replaced in June 2013 by the NSW Crown Holiday Parks Trust. The Trust is managed by a Trust Board and is responsible for care control and management of the part of the Reserve that supports the Holiday Park together with some adjoining areas that form an integral part of the public open space network for Evans Head. The land managed by the NSW Crown Holiday Parks Trust is shown in Figures 1 and 2 and comprises a number of lots with a total area in the order of 14.74 hectares.

Deposited Plan	Lot
DP 1091080	549
DP 1091080	Part 550
DP 1045792	11
DP 1136547	7304
DP 1136547	Part 7303
DP 1113078	7036
DP 755624	372
DP 755624	Part 172
DP 755624	Part 405
DP 755624	Part 287
DP 755624	Part 281
Total Area a	approx 14.74 ha



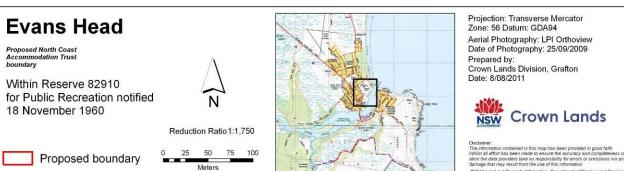


Figure 1- Reserve Boundaries – part Reserve 82910 for Public Recreation

Silver Sands Holiday Park

Plan of Management



Figure 2 – Part Reserve 82910 for Public Recreation – Land Covered by this Plan of Management

1.3 Basis for Management

The care, control and management of this part of Reserve 82910 is to be in accordance with the objects and principles of Crown land management described in Sections 10 and 11 of the *Crown Lands Act 1989* and the land management provisions of Part 5 of the Act. The land will therefore be used and managed in accordance with the following:

- The Plan of Management applying to the land;
- Crown Lands Act 1989;
- *Environmental Planning and Assessment Act 1979* and any planning instrument permitting the use of the land for a specified purpose or otherwise regulating the use of the land;
- Local Government Act 1993;
- Residential Parks Act 1998;
- Holiday Parks (Long-term Casual Occupation) Act 2002; and
- The provisions of the Local Government (Manufactured Home Estates, Caravan Park, Camping Grounds and Moveable Dwellings) Regulation 2005;
- Any other relevant or applicable legislation.

The preparation of this Plan of Management has included, over a period of time, site inspections, consultation with the Trust, discussions with the caravan park manager, reviews of relevant Crown Land's reports, policies and data and reviews of relevant Council reports, policies and data.

1.4 North Coast Holiday Parks

North Coast Holiday Parks is the trading name that has been adopted for the management and marketing of a number of caravan parks and reserves on the North Coast of New South Wales. A majority of these properties are managed by the NSW Crown Holiday Parks Trust which is a land management corporation established by the Minister for Lands under the provisions of the *Crown Lands Act 1989*.

While a key focus of North Coast Holiday Parks relates to the operation of caravan parks there is a range of wider land management responsibilities addressed. In this context the operational and administrative framework of North Coast Holiday Parks has been structured to ensure;

- the Crown and the community assets are used in accordance with legislative provisions, policy goals and best practice commercial management;
- accurate information is available to the government on the performance of the Reserves and the caravan parks;
- financial and human resources are used efficiently;
- environmental impacts are minimised;
- probity is achieved in the operation of the reserve and the caravan park;
- contractors and employees comply with established policies and procedures including legal requirements with respect to work health and safety, industrial relations, etc;

- the value of the assets of the community and the Crown are safeguarded and enhanced; and
- the administration and management of the Reserve and the associated commercial activities delivers ecological sustainability, intergenerational equity and identifiable public benefits.

1.5 Planning Precincts

Within this Plan of Management the subject reserved land will be described and referenced in terms of three Planning Precincts (see Figure 3);

- Northern Precinct which is the largest portion of the Holiday Park with an area in the order of 9.8 hectares and supports 372 approved sites;
- **Central Precinct** which has an area in the order of 2 hectares and is comprised of public open space that supports 38 approved sites and a variety of passive and active recreational facilities; and
- **Riverside Precinct** which is the southern portion of the Holiday Park with an area in the order of 3 hectares with frontage to the Evans River estuary and supports 167 approved sites.

1.6 Purpose of this Plan

The purpose of this Plan of Management is to establish objectives, environmental and management strategies and actions and identify the means the Trust will employ in the care, control and management of the Reserve to meet the needs and expectations of the local and wider community.

The Evans Head Coastal Reserves Plan of Management, 2010 already applies to the Reserve, however, among its principle objectives are to "present a long-term strategy for the management of the Evans Head Coastal Reserve" and "rationalise the strategies set out in [past] plans and implement additional approaches to ensure the future management of the Evans Head Coastal Reserve is coordinated and achievable in both the long and short term". As a result the Evans Head Coastal Reserves Plan of Management examines issues at a higher overall strategic level. This Plan of Management aims to resolve the specific detail with respect to the ongoing improvement and management of the subject land. Therefore it is compatible with and complements the Evans Head Coastal Reserves Plan of Management and is integral to the Trust's responsibility to implement the actions and strategies of that adopted Plan of Management.

The most significant issues to be addressed in relation to the ongoing management of the Reserve and the Holiday Park are:

• Implementing the strategies and actions in the Evans Head Coastal Reserves Plan of Management that apply to the part of Reserve 82910 covered by this Plan of Management;

- Implementing the relevant proposals from the Masterplan and Business Development Strategy for the Evans Head Recreation Reserve, 2009;
- Ensuring the improvement of the Reserve and the Holiday Park addresses all relevant requirements of the *Crown Lands Act 1989*;
- Improving equity of access to public facilities and to accommodation and facilities for Holiday Park guests;
- Maintaining and improving the financial performance of the Holiday Park by expanding the range of accommodation provided and exploring market opportunities particularly in the shoulder and low seasons;
- Ensuring sustainability principles are incorporated into the development and management practices adopted for the Reserve and the Holiday Park;
- Ongoing compliance with the technical standards and other provisions of the *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005;*
- Authorising consolidation of the land portions that make up the Reserve and the Holiday Park into a single allotment. This action includes authorising boundary adjustments and subdivision to accurately define the areas managed by the NSW Crown Holiday Parks Trust and Richmond Valley Shire Council in their respective roles as the appointed Trust managers of reserved Crown land. This will rectify anomalies with respect to the position of existing public infrastructure in relation to land boundaries - see Appendix A for an in principle indication of the proposed lots and boundaries;
- Creating a substantial area of public domain open space which will provide a link from the Town Centre to the foreshore;
- Meeting the needs of guests through the provision of additional and improved facilities;
- Improving the presentation, entry and site layout of the Holiday Park;
- Fauna protection and management;
- Vegetation protection, preservation and management;
- Storm water management;
- Security; and
- Appropriate risk management.

The management actions in this Plan of Management will be formulated to address and achieve the following;

- **Social equity** decision making that leads to greater physical, cultural and financial access in the delivery of services and facilities;
- Environmental quality using only the resources that are required to deliver facilities and services and improving overall physical amenity while reducing detrimental impacts on natural assets;
- **Economic prosperity** promoting the development of jobs, business improvement and market growth in a sustainable manner; and
- **Corporate governance** managing assets and resources in a way that is accountable, transparent, responsive, efficient, equitable and complies with all applicable legislation.

2 STATUTORY AND POLICY FRAMEWORK

2.1 Introduction

This Plan of Management has been prepared in accordance with the *Crown Lands Act 1989*, to provide a framework for the future management, use and development of the Silver Sands Holiday Park. Other legislation including environmental planning policies, guidelines and strategies also require consideration especially where any new development proposals are contemplated.

2.2 Crown Lands Act 1989

The objects and principles of Crown land management are listed in Sections 10 and 11 of the *Crown Lands Act 1989* and form the starting point for the preparation of Plans of Management. The principles of Crown land management are that;

- Environmental protection principles be observed in relation to the management and administration of Crown land;
- The natural resources of Crown land (including water, soil, flora, fauna and scenic quality) be conserved wherever possible;
- Public use and enjoyment of appropriate Crown land be encouraged;
- Where appropriate, multiple use of Crown land be encouraged;
- Where appropriate, Crown land should be used and managed in such a way that both the land and its resources are sustained in perpetuity; and
- Crown land be occupied, used, sold, leased, licensed or otherwise dealt with in the best interests of the State consistent with the above principles.

The Act and existing policy for the management of Crown land has always encouraged the appropriate commercial use of reserved Crown land. Commercial activity can meet the needs of public users of a reserve as well as generate the financial means to manage and improve the Crown Reserve system generally. A specific requirement of the Act is the proceeds of commercial activities on reserved Crown land are to be spent on the management of reserved Crown land.

Part 5 of the Act deals specifically with the management of Reserves and matters related to the appointment and responsibilities of Reserve Trusts. The purpose of establishing reserve trusts is to allow reserved Crown land and potentially other land (Crown and freehold) to be managed - to varying degrees of independence from the Crown Lands Division - but subject to Ministerial direction. "Reserve" is a term for an area of land set aside for a public purpose in the sense used in Part 5 of the Act. A reserve trust can manage an unlimited number of reserves or parts of reserves. The affairs of a reserve trust can be controlled by any one of the following;

- The Minister;
- A board of Trustees (up to seven) plus any number of ex officio appointments;

- A corporation (including a Council); or
- An administrator.

Reserve trusts have a statutory responsibility to manage land in the public interest and to achieve the Principles and Objects of Crown Land Management as defined by the Act. The focus of a reserve trust's activities in relation to land under its control is generally defined by the public purpose(s) of the reservation. Where a Plan of Management has been adopted by the Minister for Lands the trust is required to implement the actions described in the Plan. In the absence of a Plan of Management the detail of how a reserve is developed and used is a matter for the trust provided always its actions are consistent with the purpose of the reservation and in conformity with the relevant requirements of the Act. Money generated from commercial activities on the reserve must be spent on the management or development of the reserve although the Minister may direct that money is applied for the improvement of other reserves.

Provided a trust complies with legislative and policy requirements there is no limit placed on the activities of a trust, its organisational structure or the method of its operations. But, the Minister has the statutory right to review a trust's behaviour and performance and may terminate a trust's appointment. The Minister can issue directions in relation to the functions of a reserve trust and how funds are employed in relation to debt and where the proceeds of a sale or lease are applied. A trust can employ its own staff, use contactors or enter into agreements with other entities, organisations and individuals to manage the land.

2.3 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979 (EP&A Act)* provides the statutory basis for the development consent process in New South Wales. Section 79C of Part 4 of the *EP&A Act* outlines the factors that must be must considered when a Development Application is assessed. These include:

- any environmental planning instrument;
- any draft environmental planning instrument that has been placed on public exhibition and details of which have been notified to the consent authority.
- any development control plan;
- the Regulations;
- the likely impacts of the development, including environmental impacts on both the natural and built environment, and social and economic impacts on the locality;
- The suitability of the site for the development;
- any submissions made in accordance with the Act or the Regulations; and
- the public interest.

The *EP* & *A Act* has a range of other provisions that may take effect depending upon the nature of a development proposal and the issues that may be encountered.

2.4 Local Government Act 1993

While the *Local Government Act 1993* (*LG Act*) contains many provisions that have an impact on the management of the Reserve there is one aspect of particular importance: the approval requirements for the operation of caravan parks that flow from Section 68 of the Act. Section 68 of the Act requires the owner or manager of a caravan park to seek an approval from Council to operate a caravan park and, in certain circumstances, the prior approval for the installation of moveable dwellings. Council may impose conditions on the operation and structure of a caravan park. The Section 68 Approval to Operate for the Silver Sands Holiday Park provides for the following numbers and categories of sites;

Site Types	Number
Long term	45
Short term	380
Campsite	154
Total Sites	579

The current Section 68 Approval to Operate Silver Sands Holiday Park commenced on 17 May 2012 and will expire on 30 June 2015. A copy of the Approval is included at Appendix A.

2.5 Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005.

The technical standards for the development and operation of caravan parks are defined in the *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005.* The Regulation addresses technical requirements with respect to site types, setbacks, site coverage, road dimensions, parking, provision of amenities and the like.

Clause 74 of this Regulation provides that the prior approval of a council is not required for the installation of a relocatable home or an associated structure on a dwelling site within a caravan park so long as it is designed and constructed in accordance with the requirements of the regulations. This exemption is modified by sub clauses 6 and 7 which deal with installation on flood-liable land and moveable dwellings of more than one storey.

2.6 Holiday Park (Long Term Casual Occupation) Act 2002

The *Holiday Parks (Long-term Casual Occupation) Act 2002* and the associated Regulations set out the rights and obligations of long-term occupants of moveable dwellings in caravan parks in New South Wales. The Act recognises that while the occupant has a right to occupy a site there is no interest in the land. In essence, the Act provides for an occupation agreement, which runs for at least 12 months, between the manager of a caravan park and the owner of a moveable dwelling for the use of a site. Some of the principal issues addressed by the Act include:

- Information that a park owner must provide prospective occupants;
- The form and content of agreements;
- What happens at the end of an agreement;
- Occupation fees and charges;
- The formation and amendment of Park Rules;
- Dispute resolution mechanisms and the role of the Consumer, Trader and Tenancy Tribunal constituted by the *Consumer, Trade and Tenancy Tribunal Act 2001*.
- The fate of abandoned goods (i.e. moveable dwelling) and sites.

The former Department of Lands introduced an Information Sheet on the creation of occupation agreements which provides policy guidance on the principles to be followed. The policy states that agreements for sites on reserved Crown land must be limited to no more than 12 months. The Trust will administer the holiday van occupancy agreements in accordance with the Act and under the prevailing Crown Land's policies and guidelines.

2.7 The Residential Parks Act 1998

The Residential Parks Act 1998 was developed by the Government to ensure the rights of permanent park residents and obligations of park owners were clearly defined and appropriate processes and procedures were implemented which recognised these rights.

The Act provides for rental tenancy agreements, methods for rental determination and procedures for resolving any disputes between park owners and residents.

2.8 Residential (Land Lease) Communities Act 2013

The Government has replaced the Residential Parks Act 1998 with a new Act which responds better to the needs of both home owners and operators. The Residential (Land Lease) Communities Act 2013 commenced on 1st November 2015. The Act provides appropriate protections for home owners while recognising the needs of operators to develop and sustain efficient and effective business operations. Key reforms include:

- new rules of conduct for operators and sanctions for non-compliance;
- mandatory education for all new operators;
- a community-based approach to dealing with increases in site fees;
- improved processes for making, amending and enforcing community rules;
- new arrangements for disclosure of information to prospective home owners; and
- new rules to clarify and streamline the process for owners selling their home on site.

2.9 Rural Fires Act 1997

Amendments to the *Rural Fires Act* have led to mapping of bush fire prone land and a requirement for development proposals to respond to the requirements of the *"Planning for Bushfire Protection 2006"* Guidelines. In addition the Act defines a number of land uses including tourist accommodation in the category of "special fire protection purpose". Development proposals in this category must respond to a more restrictive set of requirements in the Guidelines.

2.10 Water Management Act 2000

The management of works and activities along "waterfront land" adjacent to rivers and creeks emerges from the requirements of the *Rivers and Foreshores Act, 1948* which was repealed in 2008 and replaced with relevant provisions in the *Water Management Act*. Land in the Riverside Precinct is "riverfront land" in terms of the definition in the Act. Section 91 of the *Water Management Act* requires controlled activity approvals from the NSW Office of Water for works in a zone which is up to 40m from the top of the bank of a creek or estuary.

Clause 6.8 of *Richmond Valley LEP 2012* also makes provision for detailed consideration of development near watercourses and riparian lands. In addition LEP 2012 identifies the entire Evans River estuary as "key fish habitat. As a result a due diligence process by the Trust that takes account of the requirements of the *Water Management Act 2000* and the *LEP 2012* provisions will be undertaken for any works in proximity to the estuary.

2.11 The Native Vegetation Act 2003 and Regulation 2005

The Act deals with the management of native vegetation. It aims to ensure key safeguards are in place with respect to water quality, biodiversity and the prevention of salinity or land degradation when native vegetation is to be removed. To do this the Act provides for certain assessment procedures to be followed which may include the preparation of property vegetation plans. At the same time the Act provides exemptions and exclusions for certain lands and vegetation types as well as the possibility of providing off-sets to balance the loss of significant vegetation.

2.12 Federal Disability Discrimination Act 1992

While this Act has been in place for some years in 2010 Access to Premises Standards were developed in association with the Act and these took effect in May 2011. A key requirement in this legislation is the proportion of holiday accommodation structures (eg cabins) that must be provided as fully compliant with respect to accessibility requirements for disabled guests.

The proportion is expressed as a ratio. Where 4 to 10 short term accommodation dwellings are provided, at least one must be fully compliant. Where 11 to 40 short term accommodation dwellings are provided, at least 2 must be fully compliant. These provisions apply when new accommodation units are constructed or installed and will be addressed as changes and upgrades are made to the stock of cabins in the Silver Sands Holiday Park.

2.13 Relevant Environmental Planning Instruments

2.13.1 Richmond Valley Local Environmental Plan 2012

Richmond Valley Local Environmental Plan 2012 commenced on 21st April 2012. Under this instrument the land covered by this Plan is zoned RE1 – Public Recreation Zone (see Figure 4). Development of a "caravan park" is a permissible land-use in the zone with consent.

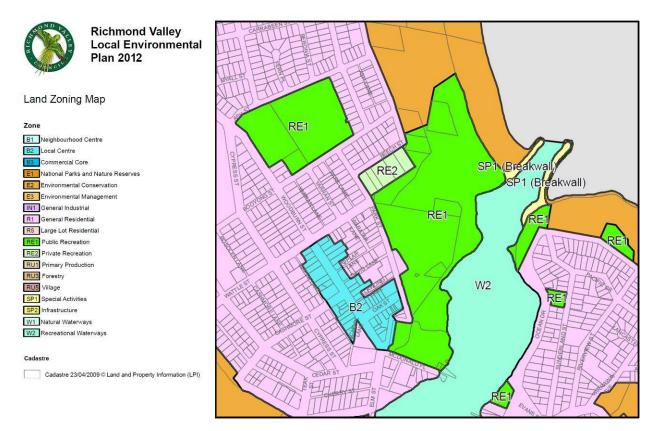


Figure 4 - Land Zoning – Image compiled from published LEP 2012 mapping.

There are a range of other provisions within the *LEP* that apply to the Reserve. The *LEP* mapping identifies the following matters and issues that are subject to specific provisions.

- The LEP Heritage Mapping identifies an item of local landscape heritage significance which comprises Norfolk Island pines and stands of paperbarks within Lot 172, DP755624, Lot 7303, DP1136547 and Lot 550, DP1091080 in the Riverside Precinct (see Figure 5);
- 2. Other vegetation within the reserve is identified in the Terrestrial Biodiversity map as "Biodiversity" (see Figure 6) and is subject to the provisions of Clause 6.6 of the LEP which has the objectives of protecting native fauna and flora and the ecological processes necessary for their continued existence and encouraging the conservation and recovery of native fauna and flora and their habitats.
- 3. Acid sulphate soils of Class 2 and 3 (see Figure 7); and
- 4. The estuary adjoining the Central and Riverside Precincts is identified as "key fish habitat" (see Figure 8).

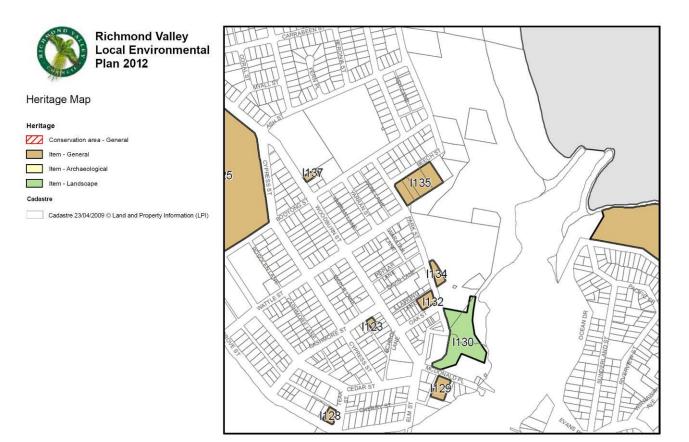


Figure 5 – Heritage Map – Image compiled from published LEP 2012 mapping.

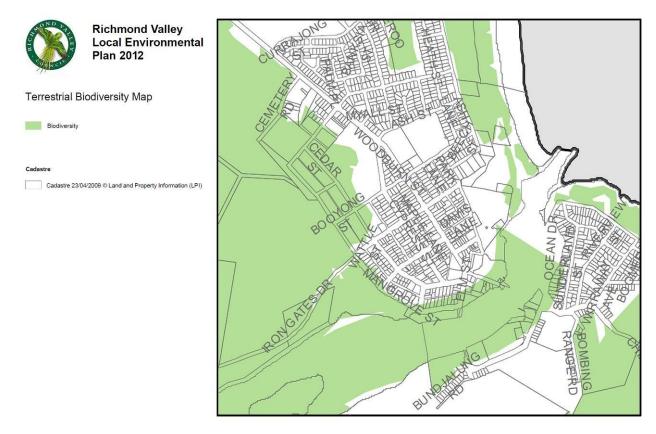


Figure 6 – Terrestrial Biodiversity – Image compiled from published LEP 2012 mapping.



Richmond Valley Local Environmental Plan 2012

Acid Sulfate Soils Map

Acid Sulfate Soils

 1
 Class 1

 2
 Class 2

 3
 Class 3

 4
 Class 4

 5
 Class 5

Cadastre
Cadastre 23/04/2009 © Land and Property Information (LPI)

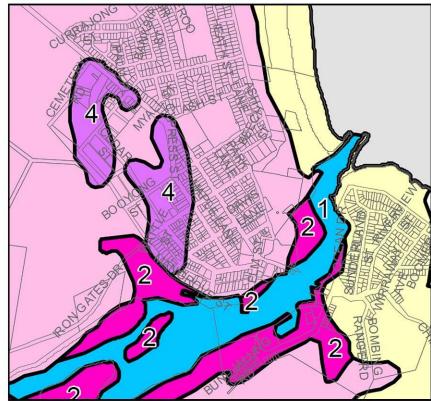


Figure 7 – Acid Sulfate Soils – Image compiled from published LEP 2012 mapping.

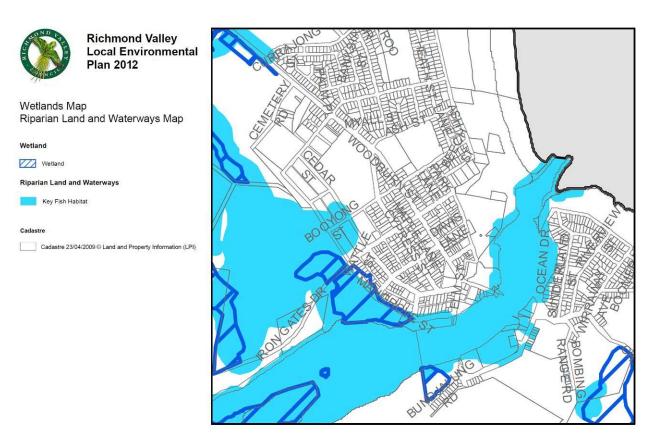


Figure 8 – Riparian Land – Image compiled from published LEP 2012 mapping.

2.13.2 Richmond Valley Development Control Plan 2012

The Development Control Plan (DCP) also commenced on 21st April 2012 and contains a range of provisions in relation to development within the local government area. In large measure the provisions of the DCP identify in more detail the issues that need to be addressed when new development is proposed. There are sections that deal specifically with caravan parks, heritage, acid sulfate soils, flooding, vegetation and other issues that would need to be addressed where new development is proposed. It is noted that on 1 March 2013 a new planning reform came into effect which among other things provides that DCPs are now;

- to provide 'guidance' to development proponents and consent authorities;
- are about 'facilitating development that is permissible'; and
- DCP provisions are **not** 'statutory requirements'.

2.13.3 State Environmental Planning Policy No. 21 – Caravan Parks

In 1986 the Government made changes to the prevailing legislation to allow both short-term and long-term accommodation to occur in caravan parks by way of moveable dwellings. This brought about a wider definition for caravan parks.

State Environmental Planning Policy No. 21 – Caravan Parks (SEPP 21) was prepared in order to ensure that this wider meaning applied to all relevant planning instruments whether existing or proposed. In essence SEPP 21 stated that where caravan parks are a permissible land use they will take on this wider meaning.

In addition, the Policy makes development consent mandatory for all new caravan park proposals regardless of local instruments. Councils are also required to have regard to the impact of new long and/or short-term dwelling sites on residential and tourism land uses and operations in their local government area.

A key element of the Policy is found in Clause 8, sub-clause (4A). The clause removes the effect of any other environmental planning instrument and the need for a development application with respect to the installation of moveable dwellings on land approved for use as a caravan park.

2.13.4 State Environmental Planning Policy No. 71

State Environmental Planning Policy No 71 – Coastal Protection (SEPP 71) was introduced in October 2002 as part of the NSW Government's Coastal Protection Package. SEPP 71 applies to the coastal zone of the State as defined in the Coastal Protection Act 1979. The Policy gives statutory force to some of the elements of the NSW Coastal Policy 1997 and makes the Minister for Planning the consent authority for certain developments. The Policy also defines a category of sensitive coastal locations and the Policy identifies master plan requirements for certain developments in the coastal zone. While the policy primarily comes under consideration when a development application is submitted for determination the objectives and principles established in *SEPP 71* should be recognised as relevant to any coastal planning exercise. The objectives of *SEPP 71* are:

- a) to protect and manage the natural, cultural, recreational and economic attributes of the New South Wales Coast, and
- b) to protect and improve existing public access to and along coastal foreshores to the extent that this is compatible with the natural attributes of the coastal foreshore, and
- c) to ensure that new opportunities for public access to and along coastal foreshores are identified and realised to the extent that this is compatible with the natural attributes of the coastal foreshore, and
- d) to protect and preserve Aboriginal cultural heritage and Aboriginal places, values, customs, beliefs and traditional knowledge, and
- e) to ensure that the visual amenity of the coast is protected, and
- f) to protect and preserve beach environments and beach amenity, and
- g) to protect and preserve native coastal vegetation, and
- h) to protect and preserve the marine environments of New South Wales, and
- i) to protect and preserve rock platforms, and
- *j)* to manage the coastal zone in accordance with the principles of ecologically sustainable development (within the meaning of section 6(2) of the Protection of the Environment Administration Act 1991), and
- *k*) to ensure that the type, bulk, scale and size of development is appropriate for the location and protects and improves the natural scenic qualities of the surrounding area, and
- *I)* to encourage a strategic approach to coastal management.

Clause 8 of the Policy establishes a list of the matters that a consent authority must take into consideration in assessing developments in the coastal zone.

2.13.5 State Environmental Planning Policy – Major Development and State Environmental Planning Policy (State and Regional Development) 2011

State Environmental Planning Policy (Major Development) 2005 commenced on 29th July 2005 and underwent a substantial revision which came into effect on 1st July 2009. Further amendments were made in 2011. The purpose of the Policy was to identify projects to which the development assessment requirements under Part 3A of the *EP&A Act* should apply and to set out the functions of Regional Planning Panels in determining specified development applications. Changes were made in 2011 which relate to the removal of Part 3A from the *EP&A Act*. Consequently the *SEPP Major Development* now only contains some basic transitional provisions related to that previous regime. *State Environmental Planning Policy State and Regional Development (SRD) 2011* commenced when Part 3A of the Act was repealed.

Among other things this Policy establishes which types of development constitute State Significant Development and State Significant Infrastructure as well as Regional Development (in conjunction with Schedule 4A of the *EP&A Act*). Review of the Policy highlights that for tourist caravan park

development to be classified as State Significant Development the site must be classified as a "sensitive coastal location", the capital investment value of the work must be \$10 million or more and the facility must be considered to be a tourist related facility which is other than a "commercial premises".

The capital investment value for a project has been determined to be the cost of establishment of the facility. In the case of a caravan park development this value excludes components such as cabins. The facility comprises the creation of the infrastructure which includes the short term dwelling sites and all services but cabin accommodation is viewed as 'discretionary spending' because the sites can be used with or without the cabins.

It is also possible proposed development work could constitute Regional Development. This occurs by way of Schedule 4A of the *EP&A Act* coupled with the provisions of the SEPP. The Schedule indicates that development with a capital investment value of more than \$20 million is classified as Regional Development and is determined by a Joint Regional Planning Panel. Similarly, a Crown Development (a particular type of development) having a capital investment value of more than \$5 million is classified as Regional Development and is determined by a Joint Regional Planning Panel.

The improvement program proposed as part of this Plan of Management for the Silver Sands Holiday Park does not fall within the various provisions of the *SEPP State and Regional Development* outlined above.

2.13.6 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 provides that certain types of works do not require development consent under Part 4 of the EP&A Act. However, it does not prevail over SEPP 14 – Coastal Wetlands, SEPP 26 – Littoral Rainforests or SEPP State and Regional Development where there are inconsistencies. Further, the Infrastructure SEPP does not remove the requirement to obtain consent from the Minister in relation to State Significant Development.

Clause 20 of *SEPP (Infrastructure*) provides that a range of works are "exempt development" when carried out on behalf of a public authority. These works are itemised in Schedule 1 of the *SEPP* and include paths and ramps for disabled access, fencing, small decks, prefabricated sheds of up to 30 m² in area, retaining walls up to 2m in height, landscaping including paving and access tracks, minor external and internal alterations to buildings, open car parks (size is not specified) and demolition of buildings covering an area of up to 100m².

Clause 65 (2) (d) of the Policy provides that in respect of land reserved within the meaning of the *Crown Lands Act 1989*, development can be carried out without consent by or on behalf of the Director-General of the Land and Property Management Authority, a trustee of the reserve or the Ministerial Land Corporation, or an administrator of the reserve if the development is for purposes of implementing a plan of management adopted for the land. It should be noted that where this occurs, a review of environmental factors (REF) under Part 5 of the Act is usually undertaken.

Pursuant to the provisions of Clause 66(2) a number of additional works may be able to be undertaken as exempt development on a Crown reserve where a plan of management has been adopted.

Clearly the provisions of this *SEPP* are relevant to the future implementation of this Plan of Management as well as to the Trust's ongoing management of the reserved land.

2.14 Policies, Guidelines and Plans

The following non-statutory policies and guidelines are relevant to the implementation of this Plan of Management. It is expected the management of the Reserve will review policies and guidelines as they are updated or changed and will modify operational and development activities accordingly.

2.14.1 NSW Coastal Policy 1997

The *NSW Coastal Policy 1997* was released by the New South Wales Government to replace the *1990 Coastal Policy*. The stated purpose of the Policy is:

The main challenge for the Government and the community in the coastal zone is to provide for population growth and economic development without putting the natural, cultural and heritage values of the coastal environment at risk. In recognition of this challenge, the Coastal Policy incorporates the principles of ecologically sustainable development (ESD) into coastal planning. ESD aims to ensure that development occurs in such a way that the ecological processes on which life depends are maintained.¹

The definition of the coastal zone takes in areas within one kilometre of the ocean, as well as an area of one kilometre around coastal lakes, lagoons, islands, estuaries and rivers. The Policy is described as integrative based on the principles of ecologically sustainable development and

- Conservation of biological diversity and ecological integrity;
- Intergenerational equity;
- Improved valuation, pricing and incentive mechanisms; and
- The precautionary principle.

The Policy sets out a hierarchy of goals, objectives and strategic actions which include an emphasis on improving water quality and maintaining public access to the coastline.

The Coastal Policy proposes a range of management planning approaches including catchment management plans be implemented in consultation with relevant agencies to ensure sustainable development and use of natural resources occurs in harmony with the protection of the environment. A Plan of Management under the *Crown Lands Act 1989* is one of the most valuable management tools available to implement the Policy.

¹ Coastal Policy, A sustainable future of the NSW Coast - Fact Sheet, 1997

2.14.2 Sea Level Rise

In September 2012 the NSW Government made a number of significant changes to the way in which the planning and development on the coast is managed. As part of the reform package the 2009 NSW Sea Level Rise Policy Statement was withdrawn with a view to providing greater flexibility in considering local conditions in the determination of future hazards and preparing coastal management plans. The key components of the first stage of the NSW Government's coastal reforms have;

- Removed the recommendations in regard to statewide sea level rise benchmarks;
- Given support local councils in the determination and adoption of projections with specific relevance to the local conditions;
- Provided clarity with respect to the preparation and issue of Section 149 planning certificates; and
- Made it more straightforward for landholders to install temporary works to reduce the impacts of erosion.

Richmond Valley Council has developed a range of policies and programs that allow for ecologically sustainable growth in coastal areas while addressing the risk to life and property from coastal hazards and flooding. This Plan of Management will provide a planning framework for the next five to ten years and it is anticipated that as the accuracy of sea level rise projections improve over time the Plan may need to be reviewed. Most of the existing infrastructure of the Holiday Park has a short to medium term design life and new development will be engineered to meet the requirements of the relevant planning and regulatory controls with respect to coastal development.

2.14.3 NSW Floodplain Development Manual, April 2005

The primary objective of the *NSW Government's Flood Prone Land Policy* is to reduce the impact of flooding and flood liability on individual owners and occupiers of flood prone property, and to reduce private and public losses resulting from floods. At the same time, the policy recognises the benefits flowing from the use, occupation and development of flood prone land. The policy promotes the use of a merit approach which balances social, economic, environmental and flood risk parameters to determine whether particular development or use of the floodplain is appropriate and sustainable.

This approach is aimed at avoiding the unnecessary sterilisation of flood prone land. Equally it ensures that flood prone land is not the subject of uncontrolled development that is inconsistent with the exposure of the land to flooding. The policy highlights that primary responsibility for floodplain risk management rests with local councils, which are provided with financial and technical support by the State Government.

The *Floodplain Development Manual* accords with the *NSW Government's Flood Prone Land Policy*. The provisions in the Manual guide councils in the development and implementation of detailed local floodplain risk management plans to produce effective floodplain risk management outcomes. The Manual also outlines the technical assistance provided by the State Government throughout the floodplain risk management process. The Manual is concerned with the consequences of flooding as they relate to the human occupation of the floodplain for both urban development and agricultural production. It addresses flood risk in full recognition that management decisions taken in respect of the human occupation of the floodplain need to satisfy the social and economic needs of the community as well as being compatible with the maintenance or enhancement of the natural ecosystems that floodplains sustain.²

2.14.4 Crown Lands Caravan Park Policy

April 1990 the former Department of Lands issued the *Crown Lands Caravan Parks Policy*. The primary impetus for the creation of the Policy was to address issues of long-term residency, the numbers of holiday vans and to improve the appearance and management of caravan parks. The Policy establishes policies, objectives and strategies relevant to the future management and development of caravan parks on Crown land in NSW.

The objectives of the Crown Lands Caravan Parks Policy are:

- a. to develop a caravan park and camping ground system on Crown land which meets the needs of the community and provides a range of facilities for short-term use, long term use and camping.
- b. to manage caravan parks on Crown land in an environmentally acceptable manner, to provide for the protection of important scenic, natural and cultural resources consistent with the objects and principles of the Crown Lands Act, 1989.
- c. to ensure that caravan parks and camping grounds on Crown land are managed in a way that provides appropriately for the recreational and social needs of the community.
- d. to encourage the entrepreneurial management of caravan parks on Crown lands in order to provide the community with an appropriate standard of facility and the government with an optimum financial return for the land it provides.

It is clear, particularly from objective (d) above, that the intent of the Crown Land Caravan Parks Policy is that there will be a commercial orientation in the management of Crown caravan parks. However, this objective is one of a set of objectives of equal weight and therefore matters of environmental and community need must be addressed alongside financial considerations. The Policy requires that no more than 50% of the short term and long term sites in "Holiday Parks" on Crown reserves be used to accommodate long term residents and holiday vans. However, there are also sound business reasons for lower proportions of holiday vans to release prime sites for year round tourist use.

The policy for caravan parks on reserved Crown land is being reviewed by the Lands Division of the Department of Primary Industries. Recent assessment of the operation of caravan parks on

² Foreword, Floodplain Development Manual, NSW Government, 2005

Crown land has concluded little has changed in relation to the validity of the principles that shaped the 1990 policy, however, two further issues have emerged which are seen as adding weight to the position the Crown has consistently held;

- Since 1990 the number of approved caravan parks in New South Wales has declined by around 10% with an accompanying reduction in the number of available approved sites; and
- 2. Demand for tourist sites in caravan parks has steadily increased.

Park management will need to address the requirements of the revised policy when it is finalised and adopted by Crown Lands.

2.14.5 Evans Head Coastal Reserves Plan of Management, 2010

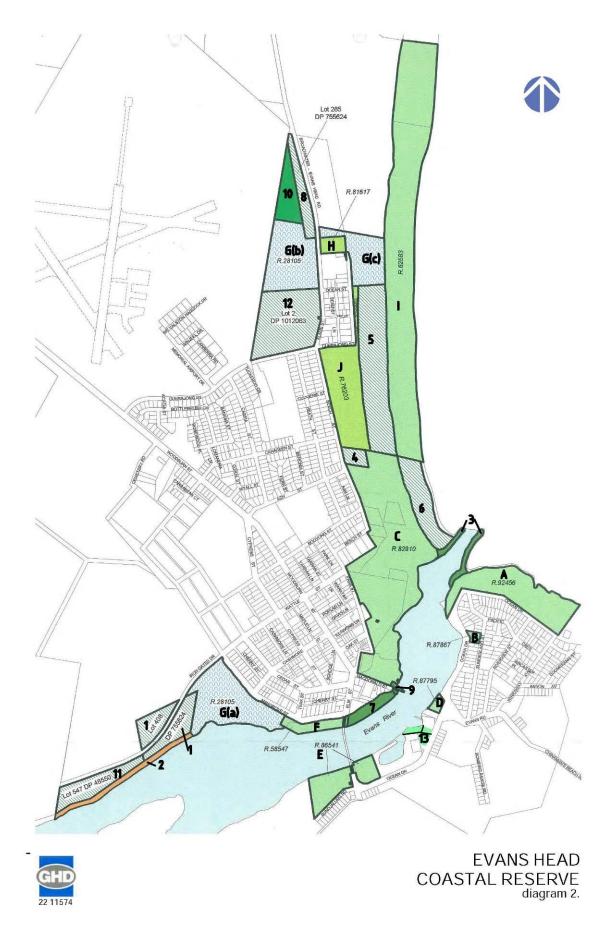
The primary aim of the Evans Head Coastal Reserves Plan of Management (2010) is to "present a long-term strategy for the management of the Evans Head Coastal Reserve" and sets out a management vision, goals, strategies and actions with the expectation of an implementation phase over 10 years. The Plan of Management applies to a number of parcels of contiguous and non-contiguous reserved Crown land at Evans Head (see figure 9 below which identifies the land included in the Plan). In the past, these reserves had been managed as individual reserves and therefore lacked an integrated and holistic approach. In this regard the plan proposes to "rationalise the strategies set out in [past] plans and implement additional approaches to ensure the future management of the Evans Head Coastal Reserve is coordinated and achievable in both the long and short term".

When the Plan was adopted by the Minister for Lands on 9th November 2010 the Silver Sands Holiday Park was managed by the Richmond Valley Council as the corporate manager of the Reserve Trust. In 2011 this part of the reserve was added to the portfolio of the former North Coast Accommodation Trust, now the NSW Crown Holiday Parks Trust.

The role of the Holiday Park is endorsed by the Plan of Management and viewed as a strength of the Reserve. Included in the Plan's principles for management is a requirement to *"Utilise the commercial opportunities of the Evans Head Coast Reserve and especially the Silver Sands Holiday Park to ensure the financial sustainability of the Reserve"*.

The strategies and actions set out in the Plan which apply to the Silver Sands Holiday Park include:

- Implement the environmental management recommendations of the Flying Fox Plan of Management for Silver Sands Holiday Park, 2008. (page 71)
- Various actions relating to Littoral Rainforest restoration and management in Reserve 82910. (page 71)





- Investigate long-term protection/management of Silver Sands Holiday Park including asset protection methods with respect to Coastal erosion. (page 72)
- A floodplain risk management plan for Evans Head land in the vicinity of the Silver Sands Holiday Park should be undertaken in accordance with the Floodplain Development Manual (2005). (page 73)
- Silver Sands Holiday Park recommended to be zone SP 3 Tourism in the *Richmond Valley LEP 2012*. (page 75)
- For Public Safety, fence off the concrete wall on the northern bank of Evans River near the Caravan Park. (page 76);
- Implement the Silver Sands Holiday Park Business/Operation Plan and Business
 Development Strategy. As such initiate a planned program of capital investment to
 maintain the commercial performance of the facility and meet the legitimate demands of
 its users. Increase the quality and quantity of cabin stock. Establish year round operation
 of the Riverside Precinct and improve the basic facilities offered to park users. (page 79)

Other applicable strategies and actions are to:

- Ensure consistency and cooperation between the Evans Head Coastal Reserves Plan of Management and the management strategies for Dirawong Reserve, Bundjalung and Broadwater National Parks (and) the Silver Sands Holiday Park. Participate in the preparation of the Richmond Coast Regional Crown Reserves plan of management. (page 67);
- Implement the environmental management recommendations of the Evans River Estuary Management Study and Plan 2002. (page 71);
- Develop and implement an overall vegetation management strategy including bush regeneration, weed control and management of bushfire hazard reduction throughout the Reserve including provision for any necessary vegetation clearing;
- Implement the Fire Management Plan. (page 73);
- Improve safety and security in the Reserve. Install minimal impact lighting at barbeque areas, car parks, skate parks, and along cycle way/walkways. (page 76);
- Provide an appropriate level of recreation facilities on the Reserve for the current and future use. Rationalise the existing playground areas to maximise their usage and minimise their impact throughout the Reserve. Consolidate playground facilities in Reserve 82910 to turn it into a regional facility. (page 83); and
- Provide a range of sustainable public recreation opportunities within the Reserve that have maximum accessibility for people with disabilities. (page 83)

2.14.6 Draft Coastal Zone Management Plan: Evans Head Coastline and Evans River Estuary, 2012

The following outline is taken from the Executive Summary included in the Draft Coastal Zone Management Plan which was on public exhibition for a period ending on 11th February 2013.

The Draft Coastal Zone Management Plan for the Evans Head Coastline and Evans River Estuary provides a ten year strategic plan for the implementation of key actions that are recommended to achieve the objectives for management of the Evans Head coastline and Evans River estuary. The main aim of the Plan is to protect and enhance the key values of this area by increasing resilience of the coastal zone and addressing key threats through efficient, effective and timely management. This will be achieved through implementation of integrated, balanced, responsible strategies to address coastal risks and restore and maintain the ecological sustainability of the coastline and estuary as well as associated recreational and commercial activities.

The Draft Plan is the culmination of the coastal zone management process for the Evans Head Coastline and Evans River Estuary. The Plan is supported by the scientific knowledge from the *Evans Head Coastline Hazard and Estuarine Water Level Definition Study* (WorleyParsons, 2012), the *Evans River Processes Study* (PBP, 1999), *Evans River Estuary Management Plan* (WBM 2002), and a range of other background information.

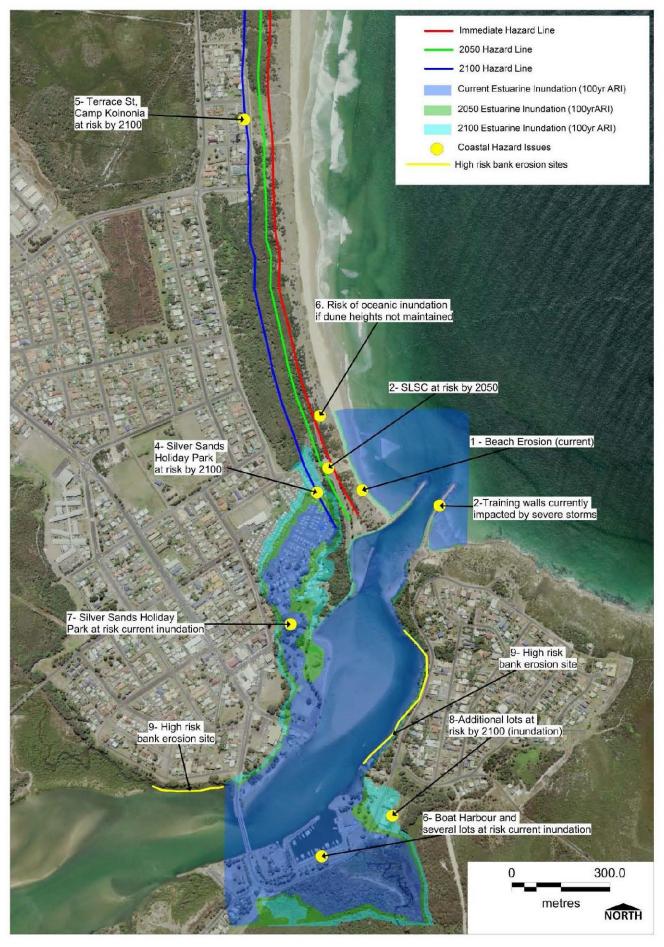
Management issues addressed by the Plan were collated from the review of background information and stakeholder consultation activities and fall into three main categories:

- Coastal Risks issues associated with beach erosion and coastline recession impacting
 public safety and property. The Plan considers the projected 2050 and 2100 coastal hazard
 lines/areas defined as part of the preceding study undertaken by WorleyParsons in 2012.
 While 2100 risks and potential issues are reported, this Plan focuses on addressing risks to
 2050 and does not include detailed scenario building to address 2100 impacts.
- Coastal Ecosystem Health key factors affecting the ecological health of the Evans River estuary and Evans Head coastline; and
- Community Uses of the Coastal Zone issues associated with the on-going use and enjoyment of the estuary and coastline areas including amenity, public access, recreation and cultural heritage.

A total of thirteen management strategies have been developed to address the identified issues. The Draft Plan specifically identifies Silver Sands Holiday Park as being threatened by extreme water level conditions within the estuary as well as coastal erosion risks. Two broad strategies are identified to address the inundation risk:

- Separate the low lying area from the estuary such that estuarine inundation does not propagate into the park; and/or
- Raise the land to be protected above the projected inundation levels (or to minimise the depth of inundation).

In the longer-term (2100), sea level rise will exacerbate the extent of estuarine inundation with a 1 in 100 year ARI inundation event as well as the frequency of more minor events. To prevent inundation of the park in the longer-term, a broader level of protection is likely to be required. Within this timeframe, it is projected that the eastern portion of the Silver Sands Holiday Park will be threatened by coastal recession and the potential for wave run up into the park area.





Raising of the low-lying land through filling of the site is likely to be the most viable strategy to address inundation risk. This action could be implemented progressively over a number of decades to achieve the target land levels. Any dredging of the Evans River for navigability could potentially gain fill material for this use, thereby achieving multiple community benefits.

The adopted approach in terms of management of Main Beach recession in the long-term will affect the overall strategy for the Silver Sands Holiday Park and therefore the combined issues of coastal recession and estuarine inundation need to be considered in unison for long-term planning.

2.14.7 Flying Fox Plan of Management, Silver Sands Holiday Park Evans Head, 2008

Since 2002 grey-headed and black flying-foxes have been roosting on a seasonal basis in the littoral rainforest remnant located on the eastern side of the Northern Precinct of the Silver Sands Holiday Park. The adjoining reserved lands have a range of natural attractions with diverse coastal and estuarine landscapes that add to the area's character and appeal. The land uses around the site are intensifying with increasing village population and visitation.

The animals are migratory and generally arrive at the site each year in late autumn in response to an abundance of food in the area. They roost at the site for six to eight months with pregnant mothers giving birth to young in spring. Most flying-foxes leave the site well before the year's end in search of other food sources.

Much of the grey-headed flying-fox population is concentrated in northern NSW and Queensland in May and June where animals exploit winter-flowering trees such as Swamp Mahogany (Eucalyptus robusta), Forest Red Gum (E. tereticornis) and Paperbark (Melaleuca quinquenervia). The core roosting area at Evans Head is approximately 0.3 hectares in size and is located at the south end of the site adjacent to long term holiday park residents, the skateboard park and the children's playground.

The Flying Fox Plan of Management lists a number of key recommendations and actions some of which relevant to the Holiday Park;

- Implement an education program addressing health and safety issues and flying-fox ecology for local residents, park residents and visitors;
- Mobilise community groups to assist with vegetation management at the site;
- Relocate the children's playground to a location within the reserve at least 100m from the roost site;
- Facilitate the construction of awnings and carports to minimise damage and affect to Park resident's property;
- Create a buffer zone between the Flying Fox Camp and the Holiday Park. This may affect the current use of land by park residents and tourists;
- Identify suitable alternative sites for residents most impacted by flying-foxes and offer to relocate mobile homes from the buffer zone;

- Undertake additional in-fill/enhancement and edge planting in core roosting area to fill gaps, reinforce edges, create a dense under storey and boost canopy replacement stock. Works to focus in centre and eastern edge away from the holiday park. Ensure landscape plantings surrounding the site are of non-roosting plant species with mature heights no higher than three or four metres in non flying-fox roosting habitat areas;
- Review site bushfire management emergency responses for the holiday park;
- Review street sweeping program in the holiday park in the period when large fig trees are fruiting and flying foxes are feeding;
- Close out and plant out informal tracks to discourage public access under roosting flying-foxes and direct people to designated tracks only; and
- Construct boardwalks along tracks connecting the holiday park to beach car park. The northern track connecting the holiday Park to the beach car park is not designated and needs to be either constructed as a boardwalk or closed.

2.14.8 Landscape Masterplan: Evans Head Street Beautification & Parking Plan, 2011

The Landscape Masterplan for the Evans Head town centre was prepared for Council by GeoLINK. The Masterplan was developed over a nine month period which involved the following tasks;

- background information and data review;
- site analysis;
- initial community consultation,
- conceptual design;
- preliminary draft Masterplan;
- opinion of probable cost;
- public exhibition and presentation; and
- final draft Masterplan.

The preliminary draft Masterplan underwent a public exhibition period. A number of proposals were generally supported, including the enhancement of footpaths and street furniture in Oak Street and additional car parking and improved through access into Oak Lane. There was considerable concern, however, for proposed central medians with tree planting along Oak and Woodburn Streets. The community preference was for these streets to remain unchanged with a reduced emphasis on new tree planting. Other proposals were set aside on the basis of cost implications. As a result the final Masterplan incorporates a simpler range of initiatives that reflect community preferences and opinions.

Implementation of the Masterplan will have a positive impact on the character of streets adjoining the boundaries of the area managed by NSW Crown Holiday Parks Trust including Park Street and Oak Lane. While not part of the original study area, GeoLINK also prepared proposals for a community park within the Central Precinct of the land managed by the NSW Crown Holiday Parks Trust because of the significance of the open space connection. The proposed enhancements were supported by the Trust and the community. A refined version of the plan was included as part of the Final Draft Masterplan for the town centre (see Figure 10). It is noted that the Final



Figure 11 – Concept Plan for Landscape Enhancement of the Central Precinct.

Draft Masterplan does not make any recommendations in relation to the landscape heritage area within the Southern Precinct of the reserved land covered by this Plan of Management.

2.15 Summary

The management, operation and improvement of Reserve 89210 and the Silver Sands Holiday Park must take account of a range of statutory controls and policies. The above provides information with respect to a number of the principal legislative requirements and polices but is not a complete summary of all that may be applicable. Importantly a number of local policies and plans specifically recognise the importance of the Silver Sands Holiday Park in relation to the local economy and the provision of tourist accommodation. It is a fundamental requirement of this Plan of Management that the Reserve Trust Manager will comply with the requirements of all applicable legislation, regulations, approvals and policies.

3 EXISTING SITUATION

3.1 Existing Development

Silver Sands Holiday Park (Silver Sands) is located within a narrow but substantial area of reserved Crown land on the eastern edge of the town of Evans Head. The Park is a substantial asset of the Reserve Trust and the New South Wales government and occupies a significant and valuable area of reserved coastal Crown land. The Park is important in the context of the regional caravan park and tourist industry and the economy of Evans Head and has been popular with campers and caravanners for many decades.

The Evans Head Locality Plan, October 2008, emphasises the significance of tourism for the economic well being of the community and states "Stakeholders in Evans Head are keen to take a proactive role in keeping Evans Head prosperous. The town has excellent opportunities for economic prosperity through business and tourism and is both surrounded by and within close proximity to many natural assets".

The Holiday Park occupies part of Reserve 82910 for Public Recreation and was gazetted on 18th November 1960. The Reserve, including the Holiday Park, forms a buffer separating commercial and residential land use from the Evans River estuary and the beach. The Reserve has extensive frontage to the estuary with pathways, roads and parking areas providing links and access from the town to the river, the estuary and the beach. The Holiday Park adjoins the town's residential and commercial area with restaurants, clubs, retail outlets and general service stores all within easy reach.

Silver Sands has two distinct operational areas separated by a fragmented open space link to the foreshore and riverside recreation areas which are used by the public throughout the year. The Park is approved for a total of 579 sites with 577 sites currently in use. Drawing SS 01 illustrates the existing layout of the Holiday Park and the allocation of sites.

3.1.1 Northern Precinct

The Northern Precinct of the Holiday Park is bounded by Park Street on the west, the Evans Head Bowling Club and Beech Street to the north and public parking areas and vegetated hind dune and riverfront areas to the east. The vehicular entrance to the Park is taken from Park Street with a reasonable space allocated to arrival and departure bays and the reception, office and manager's residence. This office and reception facility provides the check in, check out and guest management services for the entire Park. The Precinct is divided by an open storm water drainage swale which has a general north-south alignment. The Precinct currently supports 372 sites which are allocated and used as follows;

- 43 long term sites occupied by long term residents;
- 2 long term sites occupied by holiday vans;

- 311 short term sites which comprise;
 - 54 en-suite sites for tourists;
 - -104 holiday vans including 2 en-suite sites;
 - 23 units of on-site accommodation; and
 - 130 powered tourist sites; and
- 16 campsites.

The Northern Precinct also supports a majority of the Park's capital infrastructure which includes;

- Three amenity blocks;
- Manager's residence and reception area;
- A children's playground;
- Separate Park laundry;
- Camp kitchen;
- A large barbecue shelter; and
- 56 brick en-suite units.

The Precinct can be further described on the basis of four sectors which are characterised by the allocation and use of the sites;

- The Bowling Club Sector is to the west of the drainage swale and adjoins the boundary of the Bowling Club and contains 94 sites. Twenty self contained cabins of older basic design occupy the sites immediately to the west of the drainage swale. The siting of the cabins is regimented and unimaginative with no landscaping or other features to soften the impact of the structures or improve the presentation and amenity. While these cabins are in serviceable condition they will need to be progressively replaced with more contemporary products over the coming 5 to 10 years. Having said this, these units have reasonable occupancy rates and provide a value for money holiday accommodation for families. At the northern end of this line of cabins are three cabins, one of which is an accessible unit, that were installed in December 2008. The remaining sites in this area are short term powered sites with 29 occupied by holiday vans. The area is serviced by a single central amenity building which provides male and female ablutions and a laundry but does not contain disabled access facilities.
- The En-suite Sector is the northernmost part of the Park and supports 56 sites with brick en-suite facility units that were constructed in the 1970's with money provided under the Federal government's Regional Employment Development Scheme. The units are in reasonable condition in relation to their age and attract consistent occupancy rates. A small building straddles the drainage swale adjacent to this area and provides these sites with laundry facilities and associated drying areas. A contemporary camp kitchen which also straddles the drainage swale was installed in 2013. This facility provides amenity and a communal gathering point for sites in each of the adjoining sectors.
- The Beach Sector is the largest area in the Northern Precinct and is on the eastern side of the drainage swale and to the north of the Park entrance road. The Sector contains

Silver Sands Holiday Park

a total of 155 sites comprising 1 long term site, 138 short term powered sites and 16 campsites. 67 short term sites are occupied by holiday vans. The sites along the eastern side of the area are bounded by mature hind dune vegetation which contains some littoral rainforest species. The area is serviced by a single central amenity building which has male and female sections, a laundry and an accessible bathroom. Other facilities in the area include a basic camp kitchen, a children's playground and a sullage dump point.

 The Long Term Sector is on the southern side of the main entrance road and contains 67 sites, including 42 long term sites occupied by long term residents. A proportion of the long term sites are occupied by substantial relocatable homes which are generally well maintained and presented. A number of the remaining sites are occupied by holiday vans with the balance available for tourist use. The area is serviced by a central amenity which is the oldest in the Park. Again this building does not provide any facilities for disabled access. The eastern edge of the area adjoins significant vegetation that supports a colony of flying foxes which includes grey-headed, black and little red species. The flying fox colony has an impact on around thirty sites which are close to and under the trees where the animals camp. A number of these sites are occupied by long-term residents. Three two bedroom self contained cabins are located on the southern boundary of the Precinct.

3.1.2 Central Precinct

The Central Precinct provides an open space linkage from the Evans Head town centre through to the estuary and on to the ocean beach. In the past a greater proportion of this area was used for camping during peak holiday periods. Currently there are 20 short term sites and 18 campsites in the Precinct which are used primarily during peak holiday periods. The location of these sites has a detrimental impact on the width and character of the open space corridor, particularly during periods of peak visitation when the population of the town increases significantly. These sites are serviced by an amenities block which is divided into separate sections for the Holiday Park and for public use.

The Kiosk is operated on the basis of a lease and management agreement with the Reserve Trust and is important facility for the community and visitors. Aspects of the building that accommodates the kiosk could be improved to achieve better integration with the adjoining public open space.

The Central Precinct is dominated by a large poorly organised day-use parking area which detracts from the character of the open space. While public parking is required in this location the layout could be vastly improved. A pathway system provides a pedestrian link from the Town Centre to the riverfront and the beach. Other improvements in the Precinct include a section of the foreshore pedestrian pathway.

The Precinct includes areas of significant vegetation, some of which is nominated as having local heritage and biodiversity values. Nominated areas within the Central Precinct have been excised

and are under the care, control and management of the Evans Head Recreation Reserve Trust rather than the NSW Crown Holiday Parks Trust. These include the Community Centre, a large day-use picnic shelter, a section of open storm-water drainage channel and a sewer pump station.

3.1.3 Riverside Precinct

The Riverside Precinct provides 51 short term sites and 116 campsites. In the past this Precinct was primarily used during Christmas and Easter peak holiday periods. Since 2009 the use of these sites has been successfully extended to operate throughout the year. At present the sites in the Precinct are accessed through the Central Precinct.

The sites are serviced by a large communal amenity building which has male and female sections, a laundry and a disabled access family bathroom. The northern most sites also access the shared amenity building in the Central Precinct. A third older style building is located on the western edge of the Precinct but only provides toilets. This building is now prohibitively expensive to maintain. Part of the future improvement of the Riverside Precinct should address a rationalisation of the provision of ablution facilities for public and Holiday Park use. The road access to and the layout of the sites is relatively informal with only a limited proportion of the Precinct roads being formed or sealed.

The western edge of the Precinct is bounded by Park Street and Oak Lane and the southern edge adjoins Macdonald Street which runs from the town centre to the estuary and riverfront. Public parking is located at the end of Macdonald Street and a pedestrian pathway provides a link from the car park through to Main Beach at the southern end of Airforce Beach. A group of day use picnic shelters is positioned on the eastern side of the pathway and close to the water's edge.

Two tennis courts and a small brick Clubhouse are located to the west of the Macdonald Street parking area. It is intended that new tennis courts will be developed, possibly at Stan Payne Oval, however the details with respect to funding and timing are yet to be finalised. This is a matter that will need to be resolved through consultation involving Crown Lands, the Trust, the Tennis Club and Council, however, the Trust has made a commitment to assist in funding the relocation of the courts providing this can be achieved by January 2016.

Mature Norfolk Island pines, Queensland kauri, paper barks and figs are highly recognisable features of the Riverside Precinct and the estuary foreshore with a majority of the trees being identified as having local significance as landscape heritage items.

The Evans Head War Memorial is located on MacDonald Street on reserved Crown land to the south of the Holiday Park boundary.

3.1.4 Summary

The Silver Sands Holiday Park is maintained to a reasonable standard although some of the infrastructure and facilities are relatively dated in the context of the quality and significance of the location and the commercial potential of the business. Holiday vans and long term occupations account for about 40% of the total sites in the Northern Precinct and as a consequence are a significant component of the visual character of the Holiday Park and the overall presentation of the property.

The Park has a 3 ½ star AAA Tourism rating which is indicative of the age of much of the Park infrastructure and the limited provision of ancillary recreational facilities for a caravan park of this size. The accommodation rating is also 3 ½ stars which may be indicative of the overall age and quality of the Park's cabin stock. While the provision of disabled facilities addresses the letter of the Regulations because the Northern and Southern Precincts are approved as one caravan park the intent of the provisions would suggest a caravan park of this size should have more than two disabled bathrooms.

With the Riverside Precinct now being used by caravanners and campers throughout the year the roads, site layout and servicing, lighting and provision of ancillary facilities needs to be improved to match the requirements of the Regulations and current industry standards.

Existing sites in the Central Precinct are located on land that forms an integral part of the local open space network and as a consequence the use of these sites should be phased out as the Riverside Precinct is progressively improved.

3.2 Adjoining Public Reserve

The adjoining public reserve supports a range of significant community facilities which include;

- Evans Head Surf Life Saving Club;
- The community recreational hall;
- Extensive parking areas; and
- A skateboard facility.

3.3 Strategic Analysis

The Reserve and the Holiday Park has been inspected on a number of occasions to establish an understanding of the quality of the development and to identify strengths, weaknesses, opportunities and threats.

Strengths

• Location – a unique and attractive beachfront and estuary foreshore setting;

- Evans Head is a recognised tourist destination with an established reputation with fishers and surfers;
- Established clientele with good levels of loyalty and return visitation the year round occupancy rates are higher than average with consistent demand for sites and accommodation throughout the year;
- Views over the estuary and to the ocean from the foreshore and the Riverside Precinct;
- Ease of access to the waterway and the patrolled surf beach;
- Boat launching facilities are available nearby;
- Proximity to the Evans Head township and the facilities it provides including retail, cafes and Clubs;
- Access from the Pacific Highway is straightforward and is well signposted;
- Extensive land area with over 500 approved sites in a variety of settings;
- There is a substantial stock of self-contained accommodation;
- Mature and iconic vegetation littoral rainforest species, paper barks, ficus and Norfolk Island pines;
- A sound income base which has grown substantially over the past two years; and
- The Park is part of a larger group of Holiday Parks and benefits from the management, administration and marketing resources of NSW Crown Holiday Parks.

Weaknesses

- The open space link from the Town Centre to the estuary foreshore is fragmented by existing infrastructure which includes roads, pathways, camping sites and buildings;
- Amenities in the Central Precinct are shared between day visitors and campers;
- The Holiday Park does not supply a range and quality of recreational facilities commensurate with the size of the Park the quality of the location or current industry expectations;
- The physical separation of the Northern and Riverside Precincts has a range of management and administrative drawbacks;
- A substantial proportion of the cabin stock is of older design and does not match contemporary client expectations;
- The siting of the existing accommodation stock is regimented and does not occupy the prime locations within the Park;
- Although there are high levels of year round demand for cabin accommodation the range and quality of the cabins has not been significantly enhanced in recent years and as a result the client base is restricted;
- On site accommodation does not take full advantage of the setting and location and landscaping around most of the cabins is limited or non-existent;
- There is no accommodation that fully complies with requirements for disabled access;
- There is no accommodation that addresses higher end demand for quality cabins;
- Space and storage for service and maintenance equipment is limited, fragmented and not well resolved;

- The open character of the Park and its boundaries creates problems related to security for guests and the impact of anti-social behavior in the adjoining reserve;
- The core of the Park supports some older long term vans, holiday vans and annexes some of which have become unattractive and require increasing levels of repair;
- The amenity blocks and associated spaces and facilities do not present well and in some instances are surplus to requirements or no longer economic to maintain;
- Use of some sites in the Northern Precinct is restricted because of the impact of the flying fox colony;
- Some sites in the Riverside Precinct do not comply with regulatory requirements with respect to site area, access and parking;
- Many sites are in locations that are inappropriate to the role of the Central Precinct of the Reserve as an integral component of the Evans Head open space network;
- Road alignment and form in the Riverside Precinct is unresolved; and
- Camp kitchen and communal meeting areas or spaces are limited.

Opportunities

- Establish a clearly defined open space linkage between the Town Centre and the estuary and the foreshore pathway system including the elimination of sites that interfere with the integrity of that connection;
- Improve the facilities for public use in the Central Precinct by progressively implementing relevant concepts from the Draft Concept Plan prepared by GeoLink;
- Improve the kiosk and the outdoor spaces adjoining the kiosk;
- Upgrade all aspects of the Riverside Precinct and make appropriate use of the quality of the setting and the existing Section 68 Approval by improving infrastructure and introducing cabin accommodation;
- Investigate the introduction of purpose designed and sited cabin accommodation that takes full advantage of the unique location and setting of both Precincts of the Holiday Park – new cabins should generally be designed to achieve a 4 star AAA Tourism rating but overall the Park should retain a range of ratings and price points;
- Improve the range and quality of Park facilities;
- Resolve the presentation and arrangement of the communal amenity blocks;
- Increase occupancy with targeted marketing that includes packaging with other local and regional attractions; and
- Rationalise the allocation of sites for holiday vans with a view to creating quality holiday accommodation precincts capable of generating optimum financial returns.

Constraints

- Age and condition of some Park buildings and infrastructure;
- Ongoing costs of improvements will be significant if the Park is to consolidate its existing market share as well as capture new clients;
- Other parks in the region provide superior facilities and accommodation at competitive prices;

- The entrenched position and character of the holiday vans in the Northern Precinct;
- Delay in the application of a substantial capital injection could mean the Park falls further behind its competitors;
- Mature vegetation in the Riverside and Central Precincts is heritage listed;
- Planning priorities of relevant government instrumentalities; and
- Requirements of coastal planning legislation and policies.

3.4 Environmental Context

The land addressed in this Plan of Management has significant natural environmental attributes and adjoins lands that require protection and management because of their high ecological and conservation values.

3.4.1 Vegetation

The land managed by the Trust supports a significant variety of vegetation which includes species and associations that are endemic as well as the iconic but introduced Norfolk Island pines that have been planted along the estuary foreshore. The *Richmond Valley Local Environment Plan 2012* identifies the importance of the vegetation both in terms of terrestrial biodiversity and heritage significance.

A small area of remnant littoral rainforest is found in the Northern Precinct and extends into the Central Precinct. Due to its small size, isolation and impacts from adjoining human activity the area has limited species abundance and diversity. The remnant has been identified as predominantly a simple notophyll littoral rainforest which is characterized by Tuckeroo (*Cupaniopsis anacardioides*) and Lilly Pilly (*Syzygium sp*).³ Tulipwood (*Harpulia pendula*), Weeping Lilly Pilly (*Waterhousia floribunbda*), *Ficus sp* and other rainforest species are also present. The part of this vegetation community to the east of the Long Term Sector provides habitat for grey-headed and black flying-foxes which are a threatened native species.

The mature vegetation in the Central and Southern Precincts which is identified as having landscape heritage value is comprised of a mix of endemic and introduced species which include Broad Leaved Paperbark (*Melaleuca quinquenervia*), River She Oak (*Allocasuarina cunninghamiana*), Tuckeroo (*Cupaniopsis anacardioides*), *Ficus sp*, Norfolk Island Pines (*Araucaria heterophylla*), Queensland Kauri (*Agathis robusta*) and *eucalyptus sp*.

The ongoing care and management of vegetation in the Reserve is undertaken on the basis of a comprehensive tree management strategy which balances the issues of tree health, amenity, heritage and environmental values.⁴

³ Flying Fox Plan of Management, Silver Sands Holiday Park Evans Head, Richmond Valley Council, 2008

⁴ Silver Sands Holiday park Tree Management Report, Arborsite, August 2013

3.4.2 Flooding

While the Holiday Park is not currently defined as "flood prone land" the Coastal Zone Management Plan⁵ states that the north bank of the Evans River estuary including Silver Sands Holiday Park and southwards to MacDonald Street is currently at risk from estuarine inundation during severe storms including more localised catchment flooding effects. This situation is predicted to be exacerbated into the future as a consequence of the impact of climate change and sea level rise. The Coastal Zone Management Plan further recommends that work be undertaken to establish a better understanding of the likely frequency, duration and depth of inundation for Silver Sands so as appropriate action can be taken to ameliorate and reduce risks.

3.5 Business Context

3.5.1 NSW Tourism and the Visitor Economy

The government's NSW Plan 2021 is focussed around rebuilding the State's economy – "The Government's number one priority is to restore economic growth and establish NSW as the first place in Australia to do business." Growth in the economy will not only generate more jobs but also produce more revenue to improve services, reduce taxes, build more infrastructure and tackle the cost of living. The Plan is a "whole of state" initiative and identifies a number of high potential growth industries including tourism. A key goal of the Plan is to double tourism expenditure in NSW with the Visitor Economy Taskforce and Destination NSW being established to provide strategic direction and funding support to regional tourism organisations.

In June 2012 the NSW government released the Visitor Economy Industry Action Plan. ⁶ The plan outlines a number of key priority actions required to enable the achievement of the goal. A number of immediate actions outlined in the plan are pertinent to the supply of tourist accommodation and other visitor economy related facilities on Crown land. These include improving planning processes to encourage quality and appropriate accommodation on Crown land in locations of high natural amenity (Action 35D) and identifying and releasing land for visitor economy purposes (Action 6C). The Plan also advocates the implementation of Destination Management Planning to enable a coordinated approach to addressing demand and supply, and policy and planning issues including infrastructure requirements and the role of Crown land within the identified zones (Action 18A).

In this context the NSW Crown Holiday Parks Trust has a responsibility to support the government's objectives and respond to tourism demand by recognising the dynamic nature of the tourist marketplace in the State and the region. This has particular relevance to the continuing operation of the Silver Sands Holiday Park and the contribution it makes to the local economy and the ongoing development and management of the Reserve.

⁵ Draft Coastal Zone Management Plan: Evans Head Coastline and Evans River Estuary, 2012

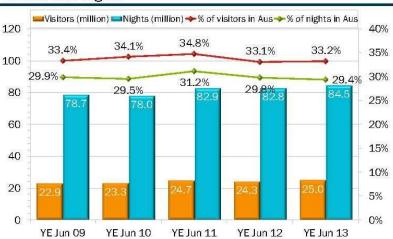
⁶ Visitor Economy Industry Action Plan, NSW Trade & Investment, December 2012

3.5.2 NSW Tourism

Tourism's contribution to Australia's Gross Domestic Product (GDP) has reached \$87.3 billion or 5.9% of total GDP with average annual growth in the order of 4.6%. Total travel in New South Wales for the year ending June 2013 produced expenditure in the order of \$26.7 billion dollars. Total expenditure in relation to domestic overnight travel in New South Wales for the same period resulted in expenditure of \$14.5 billion which was an increase of 4.9% when compared to the previous twelve month period.

The visitor economy supply chain generates added economic multipliers, which means every dollar spent on tourism generates an additional 90 cents in other parts of the economy. At 1.9 tourism's multiplier is greater than mining(1.6) and retail trade(1.7).⁷ Of all Australian states, NSW continues to attract the highest number of domestic overnight visitors maintaining 33.2% of national market share and receiving 25 million domestic overnight visitors in the year to June 2013.

As the table below shows, visitors spent 84.3 million nights in the state. When compared to 2012, visitor nights increased by 0.8% and visitor numbers increased by 2.4%. Over half of the expenditure by domestic overnight visitors (62%) occurs in regional areas of NSW and contributes \$8.7 billion to regional communities across the state.



Visitors and nights

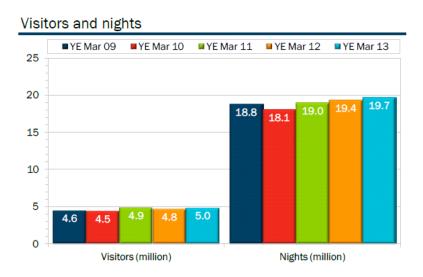
3.5.3 North Coast Tourism

The North Coast tourism region of NSW extends from in the north Tweed Heads and to the Port Stephens local government area in the south. In the twelve months to March 2013, the region received 5 million domestic overnight visitors, up by 3.5%. ⁸ Visitors spent 19.7 million nights in the region, staying on average 4 nights per trip. Expenditure by domestic overnight visitors to the North Coast region directly contributes \$2.8 billion to the region's local economy.

⁷ Tourism's contribution to the Australian economy, 1997-98 to 2011-12, Tourism Research Australia, July 2013

⁸ Travel to North Coast NSW, Year ended June 2013, DestinationNSW

Caravan Parks and commercial camping grounds are a popular choice on the North Coast NSW with domestic visitors spend almost 4.3 million nights in caravan parks or commercial camping ground accommodation in the twelve months to March 2013. Given the coastline and scenery it is not surprising that one in two domestic overnight visitors to the region travel for holiday or leisure purposes. A further 36.5% of domestic travel to the region is to visit friends and family. Together these groups account for almost 90% of the domestic overnight visitor market.

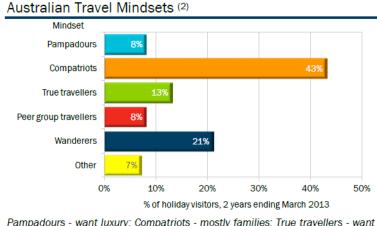


The Richmond Valley receives 96,000 visitors annually who stay 352,000 nights in the region and contribute \$45 million to the regional economy. Visitors to the Richmond Valley comprise two main groups – older adult couples and families with young children (aged 14 or less). ⁹

Regional communities and Queensland are important source markets for the Richmond Valley, accounting for 80% of all visitors to the LGA. 40% of domestic visitors to the LGA stay at the homes of friends and relatives which is not surprising given that 46.7% of visitors to the Richmond Valley travel to the region with the main purpose of catching up with Visiting Friends and Relatives ('VFR' market). However, caravan parks and commercial camping grounds are the 2nd most popular form of accommodation in the LGA, accounting for 35.2% of nights in the region. This is significantly higher than the state average which sits at 12.4% of domestic overnight nights.

The travel mindset of domestic visitors is also an important consideration when establishing the types of accommodation and recreational facilities appropriate for the visitors to the region (see graph below). The 'compatriots', comprising mostly of families, account for almost half the domestic overnight visitors to the region, followed by the wanderers (21%) who are characterised by taking time out to explore and discover.

⁹ Travel to Richmond Valley LGA, Four year average annual to September 2011, DestinationNSW



Pampadours - want luxury; Compatriots - mostly families; True travellers - want depth of experience; Peer group travellers - seeking a fun experience with friends; and Wanderers - taking time to explore and discover. (2) Source: Inside Story, 2YE Mar 13

3.5.4 Caravan Parks on Crown Land

In New South Wales there are approximately 900 caravan parks, camping grounds and primitive camping grounds of which about 30% are on Crown land managed by the Lands Division of the Department of Primary Industries. Caravan parks on Crown land supply a disproportionately large component of the available sites for tourists in New South Wales and occupy some of the State's premium tourist accommodation locations. Over the past 20 years the number of caravan parks in New South Wales has declined by about 10%. In the coastal zone there is often development pressure on existing caravan parks on freehold land. In many instances the strategic value of the land has increased resulting in re-zoning and re-development for residential or other forms of commercial and tourist land-use.

The number of tourist sites in the remaining caravan parks is also decreasing. Most parks were originally developed in the 1960's and 1970's. The design parameters from that time are no longer appropriate for many contemporary vans, 5th wheelers, motor-homes, cabins or even large tents. As a consequence the redesign and improvement of caravan parks to meet current and future consumer expectation can result in reductions in the total number of sites in any given park. At the same time there has been significant growth in the caravan, camper trailer, campervan and motor-home marketplace. In this context the Trust Managers of caravan parks on Crown reserves have a responsibility to maintain the supply of sites and the range of site types for tourists while recognising the wider land management objectives of the *Crown Lands Act 1989*.

3.6 Holiday Vans

Holiday vans are those owned by individuals and families which, subject to an executed written agreement, are able to be located in the Holiday Park for the payment of an annual fee. Owners of the vans are entitled to a maximum of 180 days use in any 12 month period. The tenure arrangements for holiday vans are subject to the provisions of the *Holiday Parks (Long Term Casual Occupation) Act 2002*. Occupation Agreements are renewed on an annual basis.

The Silver Sands Holiday Park has capacity to increase the supply of tourist sites through the release of holiday van sites for year round tourist use. Management of holiday vans will continue to be undertaken in accordance with the provisions of the *Holiday Parks (Long Term Casual Occupation) Act 2002*.

3.7 Summary

The principal strength of Silver Sands Holiday Park is the spacious beach front and river estuary location which is within easy reach of all essential services and close to the Pacific Highway. The expansive land base and existing mature vegetation provides numerous options for the provision of quality facilities within an attractive relaxed setting. The Park has developed a very strong existing clientele and income base.

Research and statistics from Destination NSW demonstrate that the North Coast NSW Region is performing well in terms of visitors and visitor nights. Importantly caravan parks are the most popular choice for commercial accommodation accounting for 21.9% of visitor nights in the Region. Statistics for the period to the end of March 2013 have identified the two main groups of domestic overnight visitors to North Coast NSW as those aged between 25-44 years (30.2%) and those aged between 45-64 years (36.5%).

The design of new facilities needs to continue to be focused on the development of a family friendly holiday destination that also caters effectively for groups and older travellers. During peak holiday periods the Park population is in the order of 1,500 to 2,000 people and as a consequence the facilities that are provided must be able to safely accommodate high levels of use. In this context the availability of large adjoining spaces is often as important as the size of the actual facility.

Specific issues that should be addressed in any medium term development and improvement program include;

- Protection and rehabilitation of significant vegetation communities including appropriate re-establishment of endemic vegetation species;
- Achieving a balance between the allocation of reserved land for tourism and public open space;
- Adequate provision of facilities and accommodation for people with disabilities;
- Re-allocation of sites occupied by holiday vans for tourist use to comply with the requirements of the Crown Lands Caravan Parks Policy;
- Consolidation of the use and presentation of areas within the Holiday Park that have already been the subject of significant investment;
- Improvement and expansion of the range of cabin accommodation with a specific objective of addressing the requirements of families, people with disabilities and older travelers and investigating opportunities for securing new business from groups; and
- Additional en-suite and drive through sites required to service short stay touring vans and RV's.

4 MISSION AND OBJECTIVES

4.1 Evans Head Coastal Reserves Plan of Management

In the first instance the management of the land under the care, control and management of the NSW Crown Holiday Parks Trust must address the following Vision and Principles for Management established in Evans Head Coastal Reserves Plan of Management which was adopted by the Minister for Lands in November 2010.

4.1.1 Vision

"The Evans Head Coastal Reserve will retain its outstanding natural and cultural values in perpetuity. The values will be respected, protected and conserved by all who use the Reserve. The Reserve will be passed on to future generations with its values intact or restored."

4.1.2 Principles for Management

"Eleven principles have been developed for this plan of management¹⁰ to help achieve the vision described above. They are:

- Utilise current information and sound management practices to conserve, protect and rehabilitate where required the natural and conservation values of the Evans Head Coastal Reserve.
- Protect the cultural heritage values of the Evans Head Coastal Reserve through actively managing each heritage item.
- Protect the scenic and aesthetic values of the Evans Head
- Coastal Reserve.
- Manage the risks from recreation and tourism within sustainable thresholds and to ensure the health and safety of Reserve users.
- Provide for multiple use of the Evans Head Coastal Reserve wherever appropriate.
- Engender a greater understanding and respect for the Evans Head Coastal Reserve and community involvement in its management wherever possible.
- Monitor and review the use and management of the Evans Head Coastal Reserve to ensure the Reserve's values are maintained for future generations.
- Provide for future recreation needs of the community (residents and visitors).
- Provide for the long term management of the Coastline in relation to coastal hazards and especially in light of predicted climate change.
- Utilise the commercial opportunities of the Evans Head Coastal Reserve and especially the Silver Sands Holiday Park to ensure the financial sustainability of the Reserve.

¹⁰ i.e Evans Head Coastal Reserves Plan of Management

• Ensure that governance of the reserve is in the public interest and of the highest legal and ethical standards."

4.2 Silver Sands Holiday Park

This Plan of Management has been formulated to enable Reserve 89210 for Public Recreation and the Silver Sands Holiday Park to have an effective role in;

- Appropriate provision of public open space;
- Providing tourist accommodation, sites and facilities;
- The generation of business income to support ongoing land management initiatives and the improvement of reserved Crown land for the benefit of the community; and
- Ongoing management of environmentally sensitive reserved Crown land.

Sustainable development and management of the Reserve is essential to maintaining the tourism use which contributes to the local economy, while protecting the natural resources on which continued tourism depends and for which the local area is recognised.

In the case of the Silver Sands Holiday Park these outcomes will be achieved through the implementation of a Vision supported by specific management objectives, strategies and actions. The structure of the action plans will allow the Trust to be responsive to economic factors, new information and social and technological change.

The Vision Statement adopted by the Reserve Trust for the ongoing management of the land covered by this Plan of Management is;

To provide a high quality contemporary caravan park accommodation facility, which meets the needs of long term residents and tourist visitors to the Park and Richmond Valley local government area;

and

To manage the adjoining public open space areas to appropriately address the passive and active recreational requirements of the residents and visitors who use the Reserve.

4.3 Management Precincts

The following provides an outline of how each of the planning and management precincts in the Park will function as the improvement program for the Park is implemented over the next 5 to 10 years.

The Northern Precinct will be focused on fulfilling the needs of the Park's tourist clientele and establishing an ambience characteristic of a coastal holiday destination. The aim for this Precinct is to support sites, accommodation and facilities for tourists. New cabins will be installed and the

existing cabins will be upgraded and in some instances replaced over the next five to ten years. New cabins will include units designed to cater for people with disabilities. The number of holiday vans in the Precinct will be progressively reduced to allow for improvements to be undertaken and to maintain the supply of sites for tourists.

The Central Precinct will provide an open space link from the Town Centre to the Evans River Estuary with existing short term sites and campsites removed. The day use facilities including public amenities, car parking, pathways and picnic facilities will be progressively improved. The kiosk building will be upgraded to the adjoining areas improved. The identified heritage listed landscape in the Precinct will be preserved and protected.

The Riverside Precinct will be focused on fulfilling the needs of the Park's tourist clientele through the provision of short term sites and campsites for caravans, tents and camper vehicles and cotemporary cabin accommodation. Formal road access to existing approved sites will be developed but the design will ensure the open spacious character of the Precinct is preserved. The Precinct will not provide any sites for holiday vans. The identified heritage listed landscape in the Precinct will be preserved and protected.

4.4 Key Result Areas

The Mission Statement for the Silver Sands Holiday Park will be achieved through the implementation of Strategies and Actions with respect to the following Key Result Areas.

Regulatory Compliance - ensure the Holiday Park complies with all applicable statutory standards.

Health Safety and Risk Management - provide and maintain facilities in a manner which minimises risk to caravan park users and park management and promotes appropriate use and enjoyment of facilities provided on reserved Crown land.

Business Management - maintain a management and operational structure which ensures commercial viability, promotes timely and responsible decision-making, and is responsive to environmental, legal, social and technological imperatives.

Environmental Management - ensure the environment of the Reserve and the Holiday Park is managed and protected in accordance with sound ecological principles and for the enjoyment of the community.

Sustainability - ensure principles of ecological and environmental sustainability are incorporated into the design and management of the accommodation, facilities and infrastructure within the Park with the ultimate goal that resources are used efficiently throughout their lifecycle and to meet the needs of the community.

Facilities for Management and Guests - optimise the recreational and tourist potential of the Holiday Park consistent with the principles of ecological sustainability while improving park presentation and providing a range of recreation and communal facilities for guests and their visitors.

Accessibility - design and develop facilities and accommodation that enable people with disabilities and others with restricted mobility to access and enjoy the full range of holiday and recreation opportunities provided in the Holiday Park.

Tourist Sites and Accommodation - optimise income to the Holiday Park by providing a range of quality tourist accommodation including opportunities for family and traditional camping within the bounds of ecologically sustainable development.

Integrated Land Management - promote and assist integrated land management associated with the use of Silver Sands Holiday Park.

5 PROPOSED IMPROVEMENT PROGRAM

5.1 Introduction

Inspection and analysis of the Silver Sands Holiday Park and the associated reserved Crown land has resulted in identification of a range of desirable improvements, facilities and accommodation products which are required if the Park is to optimise its potential. Proposed improvements need to be assessed against their potential to enhance future financial outcomes for the business enterprise, its contribution to the community and the management of reserved Crown land. The opportunities offered through the improvement of the Riverside Precinct have the potential to grow the business by providing a greater range of site and accommodation options. In formulating a practical improvement program, a number of factors have been considered including;

- Safety, security and regulatory compliance;
- The principles and parameters established in relevant legislation and policies of the New South Wales government and Council;
- Potential to achieve environmental objectives;
- Potential to improve visitor amenity and maintain income and profit;
- Potential to improve the interface with public access to and enjoyment of the foreshore Reserve; and
- Cost and contribution to the local economy.

Given budgetary constraints and operational considerations any program will of necessity take a number of years to implement. In terms of the future financial performance of the Silver Sands Holiday Park the proposed improvement program has been formulated with four principal aims;

- To create an appropriate balance between the provision of public open space and achieving profit outcomes from a business enterprise on public land;
- To maintain and improve the family focus of the accommodation, facilities and management of the Park;
- To enable Silver Sands to capture a fair share of the existing overnight tourist visitation to the region at tariff levels that are appropriate to the quality of the location; and
- To provide Silver Sands with the opportunity to capture new visitation from recognised growth areas in the caravan park and tourist accommodation marketplace.

5.2 Priorities

In terms of expenditure on physical improvements to the Holiday Park and the Reserve the Trust will address issues in the following order of priority;

- 1. Safety and regulatory compliance;
- 2. Provision of facilities that will contribute to improved access to and public enjoyment of foreshore open space and a quality holiday experience;

- 3. Presentation of existing tourist accommodation products(landscaping of existing cabins, refurbishment and relocation of some cabins, etc);
- 4. Establishing a framework for efficient year-round operation of the Riverside Precinct;
- 5. Maintaining acceptable industry standards for infrastructure; and
- 6. Expansion of the range of tourist accommodation products offered by the Park.

Expenditure in relation to physical improvements must be matched by a commitment to a comprehensive approach to marketing and promotion.

5.3 Proposed Improvement Program

The proposed program for the Silver Sands Holiday Park and associated public domain open space has been structured to build on existing strengths and attractions. There will be some redesign and redevelopment of the layout of parts of the Park road system. This will require the relocation of sites to facilitate the introduction of new on-site accommodation and improved communal amenities and facilities. Most importantly the program also allows for a range of enhancements to the adjoining public reserve which will be integral to a fundamental change in the balance between the area allocated to the Holiday Park and to public open space.

The structure of the program is designed to bring improvements on-stream in a way that will progressively enhance the income earning capacity and profitability of the business. The construction of some items will require prior development consent and adequate time needs to be allowed for the preparation of documents, assessment and approval. In addition works will be undertaken within the context of an operating business environment and will be programmed for the period from May to September each year. While this will minimise the adverse impact of construction activity on occupancy rates and financial performance it is a significant restriction in terms of timing and planning.

Implementation of the proposed program will result in a reduction in the total number of sites in the **Northern Precinct** of the Park from 372 to 336 due to;

- Development of a new Park entry, manager's residence and maintenance compound;
- Creation of a central recreational area with active and passive components designed with a focus on the needs of families; and
- Development of a new cabin precinct which will allow for the installation of larger better quality cabins for families.

The proposal for the **Central Precinct** will see 38 existing sites removed with improvements focussed on the role of this area as an integral component of the public open space network.

The proposal for the **Riverside Precinct** will provide for a total of 151 sites comprising 146 short term sites and 5 campsites. The reduction in the number of sites is due to;

• Removal of sites from inappropriate locations and protection of significant vegetation;

- Reduction in the available land area;
- Alteration of site areas, setbacks, access and parking to meet regulatory standards; and
- Installation of cabins which require site areas greater than one existing short term site.

Proposed Improvement Program – see Drawings SS-02 to SS-04

Northern Precinct	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5
Office Reception and Manager's Residence					
New Cabins and Cabin Replacements					
Cabin Relocation and Upgrade					
Amenity Block Renovation					
Road alterations					
Maintenance and Storage Compound					
Recreation Facilities – Water Play, Camp					
Kitchen, Guest Lounge and Playground					
Barbecue Shelters					
Site rationalisation and upgrades					
Bollards and fencing					
Landscaping & Vegetation Management					

Central Precinct	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5
Develop Holiday Park arrival and departure					
lay bys and visitor parking					
Upgrade day use car park and access					
Decommission existing Holiday Park sites					
Alterations to existing amenity block					
Playground					
Landscaping and Vegetation Management					
Amphitheatre					
Upgrade Kiosk and Surrounds					
Pathways					

Riverside Precinct	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5
Establish entry and install boom gates					
Internal road construction					
Install Cabins					
Site upgrades					
Camp Kitchen					
Install Relocatable Amenities					
Develop the area currently occupied by					
Tennis Courts and Clubhouse					
Landscaping & Vegetation Management					
Fencing					

5.4 Proposed Precinct Improvements – see Drawings SS-02 to SS-04

The drawings attached to this document illustrate the way in which the implementation of the above program will change Silver Sands and improve both the Holiday Park and the reserved lands with frontage to the river and estuary foreshore. Key features of the proposed Improvement Plan are outlined below.

Improvements to the Northern Precinct of the Silver Sands Holiday Park will involve;

<u>Establishment of a new principal Park entrance</u> which will be accessed from Park Street through the Central Precinct. This will involve relocation of three existing cabins and provision of a new reception, office and manager's residence. The manager's residence will be a relocatable home installed pursuant to the relevant provisions of the *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005*. This will establish a management presence that is central to the entire Holiday Park and all check-in and check-out functions will be handled from this facility;

<u>The existing entrance to the Northern Precinct from Park Street will be retained</u> to function as an entry and exit for long term residents and holiday van owners and for other guests once they have completed check in requirements. It will also function as a service entrance with a new maintenance and storage compound being developed. These changes will involve improvements and alterations to the existing road surfaces and changes to signage;

(The above initiatives will be accompanied by the introduction of arrangements and technology to streamline the guest arrival process. Where guests have a prior booking it would not be necessary for those guests to come to Reception before entering the Park. Sites will be allocated at the time of booking and entry codes provided by email or text message prior to arrival. This will enable guests to go directly to the allocated site or accommodation and will significantly reduce the concentration of traffic at a single Park entry point. With the proposed improvements to the Park there will be three available entrance points with guests directed to the entry that is most appropriate to their allocated site. This process will be particularly advantageous during peak visitation periods as all sites and accommodation for the Christmas New Year holiday period are booked by the end of the previous October. Therefore every guest will be able to proceed directly to their allocated site. Similar circumstances apply to other peak visitation periods. This also means arriving guests can be advised of the most suitable route to their specified entrance point which will in turn reduce the likelihood of vehicles and caravans contributing to traffic congestion in the Town Centre.)

<u>Establishment of a new precinct for cabin accommodation</u> designed to achieve a 4 star AAA Tourism rating. The proposed location takes advantage of proximity to the beach and the Surf Club but will require the removal of existing holiday vans and modification of the Park road layout. The objective is to establish a greater range in the quality, price points and appeal of the Park's accommodation stock. This will strengthen the capacity of the Park to grow shoulder and low season occupancy rates;

Development of a comprehensive central recreational facilities area to provide an improved range of recreational facilities for Park guests. The existing small amenities block will be demolished, some existing road removed and traffic patterns in this part of the Park altered. The centerpieces will be a contemporary children's water play area with shade and shelter and a new camp kitchen and guest lounge. Other features will include a new children's playground, paving and landscaping. The area is to be an integrated design with pedestrian links to other parts of the Holiday Park. A number of holiday vans will need to be removed to accommodate these works;

<u>Retention and external renovation of the existing brick en-suite units</u> with improvements to the presentation of the area through landscaping; and

Provision of power to every site.

The improvements to the Central Precinct will involve;

<u>Creation of a strong public open space corridor</u> linking the Town Centre to the foreshore with a defined transition between public open space and the Riverside Precinct of the Holiday Park. This will involve removal of sites from the area to the south of the existing building which provides both public and caravan park amenities and provision of clearly defined parking areas for public access to the foreshore. The amenity block will be altered to establish an increased provision of public facilities and will no longer be used as part of the Holiday Park's required provision of ablution facilities. The sites that will be removed are currently in locations that compromise the character and function of the Reserve in providing the open space link between the Town and the foreshore. Fencing and landscape plantings as proposed in the Landscape Masterplan will define the boundary between the public open space and the Riverside Precinct;

<u>Upgrade of the kiosk building and the adjoining</u> areas to create a facility that is more integrated with the character of the foreshore and complements other improvements and facilities in this part of the Reserve.

<u>Reconfiguration of the public parking area which services day visitation</u> to the foreshore areas to provide a more efficient solution, allow an increase in the number of defined parking spaces and reduce the intrusion of vehicles within open space areas. Public pedestrian access from the Town Centre to the beach and foreshore will also be upgraded with detailed design solutions that will protect and preserve significant vegetation and visual and recreational amenity. Eight(8) spaces will be provided for disabled parking;

<u>Removal of the existing playground and establishment of a new facility for public use</u> closer to the foreshore that complies with relevant Australian Standards. Existing picnic and barbecue shelters will be modified and upgraded to create more appropriate and expansive spaces for public use;

<u>Development of a comprehensive but low key signage system</u> to inform people of the available facilities, access routes, proximity to the beach etc.

The improvements to the Riverside Precinct will involve;

<u>Development of a new entrance to the Riverside Precinct from McDonald Place.</u> Sufficient space has been provided to enable an arriving towed caravan to be completely with the Park boundary before the boom gate is activated. The proposed design also recognises that in the long term this Precinct may need a small reception facility. The setbacks from MacDonald Street will comply with current regulatory requirements with new landscape plantings to complement the existing vegetation and address the principles established in the Evans Head Street Beautification and Parking Plan.

<u>Creation of a clear delineation of the boundary between the Holiday Park and the foreshore public</u> <u>open space system</u> through use of low unobtrusive fencing integrated with landscape plantings that are appropriate to the character of the foreshore and the existing vegetation;

<u>Upgrade of the existing principal road loop within the Riverside Precinct</u> and alteration and improvement of the road pattern so as access to all sites in this part of the Park complies with the technical requirements of the Regulations. Visitor parking will be provided in accordance with the regulations although the final locations will be determined in response to operational requirements and the need to protect existing vegetation. The road design will incorporate measures for control of storm water drainage to ensure protection of the estuarine environment;

<u>Establishment of an area for cabins</u> to target demand for quality waterfront cabin accommodation. The proposed location takes advantage of proximity to the estuary and the water with views to the ocean and excellent access to the Town Centre. These cabins, as with new cabins that are installed in the Northern Precinct, are to be purpose designed to achieve a 4 star AAA Tourism rating and to establish a unique aesthetic character and quality which recognises and complements the intrinsic features of the reserve and the town;

<u>Renovation of the interior of the existing amenities block</u> and alteration of the road layout in and around the building to provide a better relationship between sites and facilities;

Provision of power to every site;

<u>Development of a camp kitchen</u> including campers' wash-up facilities and undercover seating. Guests in the Precinct will also have access to the central facilities in the Northern Precinct;

<u>Establishment of roads to the existing sites in the area bounded by Oak Lane and MacDonald</u> <u>Street</u> to achieve compliance with the requirements of the Regulations. Detailed design is to take account of and protect and preserve existing mature significant vegetation which is identified as a local Landscape Heritage item; <u>Establishment and implementation of an ongoing Vegetation Management Program</u> designed to protect and preserve the existing vegetation in the entire Precinct. Importantly the significance of existing vegetation will be addressed through provision of setbacks to site boundaries, active management of areas where camping does occur under existing trees and location of underground services to minimise disturbance of root systems during construction; and

<u>Removal of the tennis courts</u> to facilitate the relocation of existing approved short-term sites. Importantly the design of this part of the Precinct will take account of the position of the War Memorial. The detailed design process will include consultation with the RSL to ensure the final solution maintains a proper context that respects the significance and integrity of the Memorial.

5.5 Future Allocation of Sites

Implementation of the above planning, development, management and business initiatives will deliver a range of benefits to the community as well as holiday makers and generate funds for allocation to the ongoing responsible management of the entire Reserve.

Northern Precinct		
Site type	Number of sites	
Long Term	43	
Short Term – powered site	210	
Short Term – en-suite	56	
Short Term - cabin	27	
Total	336	
Riverside Precinct		
Site type	Number of sites	
Short Term – powered site	133	
Short Term - cabin	13	
Campsites	5	
Total	151	
Silver Sands Total Sites	487	

The allocation of sites when the Improvement Program is fully implemented will be as follows;

5.6 Assessing Proposed Improvements

This Plan of Management proposes that a number of improvement projects should be brought forward by the Reserve Trust over the next 5 to 10 years. While there has been wide ranging analysis and consideration of these proposals during the preparation of this Plan the following are some of the key issues that should still be considered by the Reserve Trust when deciding whether a particular land use or development is to proceed within the Reserve;

- The compatibility of the proposal with the notified purpose of the Reserve;
- The compatibility with the Vision Statement and Key Result Areas for the Reserve;

- The provisions of relevant planning instruments including the *Richmond Valley Local Environmental Plan 2012*;
- The need for the proposal, it will promote and be ancillary to the use and enjoyment of the reserve as distinct from satisfying a requirement generated by an adjoining property or by an unassociated community need;
- Design and aesthetic integrity is the detailed design appropriate to the character of the Reserve and does it contribute to an integrated approach to the design and development of improvements to the Reserve?
- The benefit the improvement will bring to people who use the Reserve;
- The impact on the existing use of the Reserve; and
- The capacity of the Trust to continue to maintain the improvement.

5.7 Reserve Improvements

Silver Sands Holiday Park is situated within a larger public reserve which provides a variety of passive and active recreation and day use opportunities for local residents and visitors to Evans Head. These areas include the estuary foreshore spaces that adjoin the operational boundaries of the Holiday Park. The public facilities in the reserve include public amenities, car parking, children's playground, pedestrian walkways and picnic facilities. The progressive improvement of the Holiday Park to achieve enhanced profits will over time make additional funds available for the improvement of facilities in the public domain components of the Reserve.

5.8 Financing Improvements

The Silver Sands Holiday Park generates income primarily from rental of tourist sites for holiday accommodation. The Holiday Park is currently trading profitably and each year contributes a levy from Gross Revenue to the Public Reserves Management Fund (PRMF). While the total number of sites in the Park will be reduced from 579 to 493 revenue projections show the business will be able to maintain and improve the current revenue and profit outcomes because:

- A substantial number of the sites that have been decommissioned were campsites that were used for very limited periods and therefore had very low average annual yields;
- Improvements to the quality of the sites and facilities will result in growth in shoulder and low season occupancy rates;
- Increased supply and quality of cabin accommodation will attract growth in occupancy rates and allow for increased tariffs; and
- Progressive reduction in the number of holiday vans will release sites for tourist use.

Funding for new initiatives will therefore be made from two sources: net profit (gross profit less operational expenses, PRMF contributions and depreciation) and loans. The only area where additional financial assistance may be considered relates to the application for grant funding to undertake environmental works and contribute towards the cost of public facilities. The Trust can apply for loan finance from the PRMF to fund implementation of aspects of the proposed Improvement Program.

6 MANAGEMENT ACTIONS AND STRATEGIES

6.1 Strategies and Actions

A range of measures have been identified as required to implement this Plan of Management to ensure the Silver Sands Holiday Park is improved and managed in accordance with the Principles of Crown Land Management. The following tables detail the Strategies and Actions to be implemented by the Reserve Trust in relation to each Key Result Area.

In the first instance the Strategies and Actions are designed to achieve the Vision, Mission Statement and Statement of Objectives outlined in Section 4. The implementation of the identified Actions will address the Management Issues identified in Section 3 and support the orderly implementation of the Improvement Program outlined in Section 5.

6.2 Regulatory Compliance

Strategy	Actions
Sites and facilities to conform to relevant regulations.	 Ensure sites are sized, located and provided with utility services and amenities in accordance with the <i>Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005.</i> Progressively implement the proposed Improvement Program to provide the mix of sites and facilities indicated on Drawings SS – 02, SS – 03 and SS - 04. Comply with the conditions of the current Section 68 Approval to operate a Caravan Park. Apply for renewal of the Section 68 Approval in a timely manner. Design, construct and install moveable dwellings and submit documents in accordance with requirements of the Regulations. Maintain the Park's Community Map to accurately reflect the current layout and use of sites. Through sound design ensure that proposed improvements comply with the requirements of the Regulations and any applicable statute, code or policy.

6.3 Health, Safety and Risk Management

Strategy	Actions
Continue to provide health, safety and risk management for the public and for staff involved in maintenance and management activities.	 Undertake ongoing comprehensive risk assessment of the Holiday Park and Reserve on the basis of a structured Work Health and Safety Management Plan. Minimise public risk through the ongoing implementation of a risk management strategy. Ensure all staff and management is appropriately trained. Maintain and use any equipment in accordance with regulations and manufacturer's specifications. Store and use chemicals as required by regulations and in accordance with manufacturer's recommendations.
Ensure the enjoyment and use of the reserve is not compromised by inappropriate behaviour.	 Undertake ongoing review of the activities that should be prohibited or regulated on the reserve.
Maintain facilities and accommodation to appropriate standards.	 Continue to maintain an asset management register and fund the ongoing implementation of the Park's asset management plan.
Protect life and property from consequences of natural events such as flooding or emergencies.	 Maintain, review and upgrade the Park's Emergency Management and Disaster Recovery Plan.
Ensure the Park, cabins and facilities are maintained and presented to a high standard.	 Provide consistent supervision and review of the maintenance and cleaning responsibilities of the Contract Manager.
Address the relevant recommendations of the Flying Fox Management Plan.	 Implement an education program addressing health and safety issues and flying-fox ecology for local residents, park residents and visitors. Relocate the children's playground to a location within the reserve at least 100m from the roost site. Facilitate the construction of awnings and carports to minimise damage and impact to Park resident's property. Create a buffer zone between the Flying Fox Camp and the Holiday Park sites in response to in response to seasonal roosting if required. Identify suitable alternative sites for residents most impacted by flying-foxes and offer to relocate mobile homes from the buffer zone.

6.4 Business Management

Strategy	Actions
Continue to maintain a process for business planning and performance review.	 Prepare an annual budget for the operation and improvement of the Holiday Park and management of the Reserve. Establish financial performance targets and undertake regular review of the operation of the Holiday Park against targets, budget and other management objectives. Report financial outcomes to the Crown Lands Division on an annual basis.
Preserve the financial contribution the Holiday Park makes to the management of the Crown estate and to the local community.	 Review and set tariffs for all sites and on-site accommodation in line with a comprehensive marketing plan on at least an annual basis. Establish tariffs for sites, which reflect the market potential for the form of accommodation being offered.
Market and promote the Park to achieve optimum commercial outcomes.	 Identify new and emerging market opportunities. Prepare and implement an annual marketing and promotional strategy.
Provide competent day to day management.	 Seek and engage competent and qualified contractors. Create, implement and maintain policies and procedures to ensure best practice for all aspects of the operation of the business and maintenance of the Crown's asset.
Provide high levels of customer service and asset and business management.	 Maintain a human resource management strategy which ensures appropriate qualifications and skills are available. Identify, prepare and implement training programs.
Manage sites occupied by long term residents and holiday van owners in a consistent and transparent manner.	 Ensure all occupancy agreements are current and in accordance with the respective provisions of the <i>Residential Parks Act 1998</i> and the <i>Holiday Park(Long Term Casual Occupation) Act 2002</i>. When long term sites are vacated those sites will revert to short term tourist use and when holiday vans sites are vacated those sites will become available for tourist use. Ensure the process to remove holiday vans from the Holiday Park is in accordance with the provisions of the <i>Holiday Park(Long Term Casual Occupation) Act 2002.</i>

6.5 Environmental Management

Strategy	Actions
Maintain environmental integrity.	 Formulate and implement an Environmental Management Strategy to identify, minimise and manage the environmental impacts of the Trust's activities on the environment by systematically integrating environmental management into daily operations, long term planning and other quality management systems. Undertake an independent Review of Environmental Factors before proceeding with implementation of proposed improvements and development.
Promote and maintain the health of existing and proposed native vegetation in the Holiday Park and along boundaries with adjoining reserves.	 Preserve and protect the Landscape Heritage areas within the Reserve. Preserve and protect existing native vegetation in the Reserve in accordance with the Vegetation Management Plan for the Park and the relevant requirements of local planning controls. Only use native species for landscaping and tree replacement; Only use non invasive grass species for turfing. Remove weeds and re-vegetate areas appropriate to land-use, design and management of facilities. All arboricultural work in the Reserve shall be best practice and undertaken by a qualified arborist in accordance with the Vegetation Management Plan. Do not permit attachment of signs, clothes lines or tent ropes to trees. Ensure lawn clippings and garden waste is disposed of correctly, and not deposited on adjacent lands.
Preserve and protect the habitat of the grey- headed flying fox	 Implement the strategies actions for the flying fox camp identified in the Flying Fox Plan of Management; Develop appropriate and practical management initiatives with respect to the establishment of exclusion zones or other measures required to protect the camp and the habitat; Manage access to and through the area occupied by the flying fox camp.
Improve and maintain environmental and visual amenity.	 Implement the relevant aspects of the Landscape Masterplan to improve the public domain open space in the Central Precinct. Provide additional landscaping to the surrounds of amenities buildings, clothes drying areas and cabins. Implement a replacement planting program for any trees required to be removed and provide protection during establishment.

Minimise disturbance to native vegetation.	 Use appropriate siting for facilities and walkways. Carefully manage pedestrian and vehicle access. Define buffer areas and protect vegetation through mulching, edge planting and/or fencing as appropriate.
Implement effective catchment management to minimise impacts on water quality.	 Implement erosion control measures, litter and silt traps and drainage line filters where required to control storm water. Use chemicals in accordance with approved Trust and AS guidelines. Promote catchment management principles as appropriate.
Minimise fire hazard to property and appropriately manage natural coastal vegetation.	 Provide and maintain adequate fire control access. Provide and maintain fuel free and fuel reduced zones where necessary. Minimise disturbance to natural vegetation. Do not allow solid fuel campfires or cooking fires.
Manage and respond to the impacts of coastal processes and climate change while allowing for natural occurrences.	 Close access and repair damage as necessary after storm events. Develop specific climate change adaptation plans in accordance with government policy.

6.6 Sustainability

Strategy	Actions
Sustainable Development	 Assess improvement and development proposals in the light of sustainability principles. Implement best practice approaches to achieving sustainable resource management.
Resource Sustainability	 Promote sustainability in the design, construction and management of assets including use of low embodied energy materials, replaceable resources, plantation timbers, etc. Price goods and services to recover the full life cycle costs of providing the goods and services including the use of natural resources and assets and disposal of waste.
Reduce carbon footprint.	• Progressively reduce dependence on high CO ² energy sources by considering acquisition of electricity from renewable energy sources.
Minimise use of water and energy.	 Manage resources with an emphasis on minmisation of energy and water use, water harvesting and re-use, and environmentally responsible waste management. Recycle waste where possible and appropriate.

6.7 Facilities for Residents, Guests and Management

Strategy	Actions
Provide facilities that reflect the quality of the location, land management priorities and current industry and market benchmarks.	 Improve the Holiday Park and develop facilities as described in this Plan of Management and as generally indicated on Drawing SS - 02, SS - 03 and SS - 04. Provide communal facilities within the Holiday Park in accordance with the relevant regulations and progressively expand and improve ancillary facilities for guests. Maintain an adequate supply of short term sites for caravans, tents and recreational vehicles. Over time provide power, water and sewer to every site in the caravan park in order to satisfy the requirements of guests. Maintain and where possible improve the AAA Tourist rating for the Park.
Implement a staged development process that is achievable in terms of planning and financial constraints.	 Undertake improvements to the Park based on the internal capacity of the Holiday Park to support the funding of the works.
Improve the presentation and efficiency of the Park entrance and reception facilities.	 Establish a new Park entry, reception, office and manager's residence. Introduce new technology to streamline booking and check-in procedures. Ensure signage and lighting throughout the park meets the safety needs of visitors, guests, residents and staff and addresses current regulatory requirements.
Remove inefficient and redundant facilities and improve amenity for guests.	 Install and construct new facilities for guests as detailed in Drawings- 02 to SS - 04 including roads and sites, barbecue facilities, camp kitchen, development of a water play area and renovation and upgrade of amenities as required.
Consolidate the maintenance and storage facilities required to service ongoing operational requirements	• Establish and new maintenance and storage compound adjacent to the existing Holiday Park entry from Park Street. Provide and an adequately sized secure compound with colourbond clad steel framed storage shed. Provide direct access from the entry area to limit the requirement for service vehicles to enter the Park.

6.8 Accessibility

Strategy	Actions
Provide facilities that facilitate equity of access.	 Design and construct communal amenities, barbecue shelters, camp kitchens, swimming pools and other communal facilities to address the relevant requirements of AS 1428 – Design for Access and Mobility; Ensure the public areas of the Park Reception and Office have access complying with the relevant requirements of AS 1428 – Design for Access and Mobility; Where possible and practical construct pathways at grades and widths complying with the relevant requirements of AS 1428 – Design for Access and Mobility; Where possible and practical construct pathways at grades and widths complying with the relevant requirements of AS 1428 – Design for Access and Mobility; Progressively improve accessibility to existing facilities; Install park furniture that takes account of the requirements of people with restricted mobility including parents with young children and carers; Provide visitor parking for people with disabilities that complies with Clause 68 of <i>the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005.</i>
Provide accommodation that addresses the requirements of people with restricted mobility.	 Design and install cabin accommodation that addresses the relevant requirements of AS 1428 – Design for Access and Mobility and where possible provide more than one bedroom within the cabin that complies with those design requirements; Progressively provide a number of units of accessible cabin accommodation that at least addresses the proportions set out in the Disability Discrimination Act, 1992 - Disability (Access to Premises - Buildings) Standards 2010

6.9 Tourist Sites and Accommodation

Strategy	Actions
Improve existing sites and accommodation.	 Progressively extend power and sullage to every site. Progressively renovate the en-suite facility units in the Northern Precinct. Replace existing cabins that are no longer market appropriate or economic to renovate and refurbish.
Provide additional on- site accommodation and maintain and adequate supply of sites for	 Install additional quality on-site accommodation designed to complement the character of the coastal setting and capable of generating a consistent income stream to finance the ongoing management of the caravan park and contribute to

tourists.	 the management of the adjoining reserved lands. Retain a balance between the provisions of sites for camping and caravanning and self contained accommodation. Progressively reduce the number of holidays vans to release short term sites for tourist use. Maintain a minimum 3 ½ star AAA rating for existing and proposed self contained on-site accommodation.
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6.10 Integrated Land Management

Strategy	Actions
Implement the Plan of Management and relevant statutory requirements in an ongoing, co operative and timely manner within the available resources.	 Liaise with local, regional and state authorities particularly where co-ordination of activities on adjoining lands is involved. In consultation with Department of primary Industries, Lands and Richmond Valley Council finalise the consolidation of the Holiday Park into a single allotment with the establishment of easements to address service infrastructure and public access requirements. Cooperate with and maintain awareness of the activities of other authorities. Obtain approvals and consents as required. Continue liaison with the Crown Lands Division in relation to new and emerging government policy that may impact on the management of reserved Crown land.
Protect and enhance Aboriginal cultural values in the Reserve	 Comply with the requirements of the "Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW" before proceeding with improvement works; Identify and protect significant sites and consult with relevant groups and authorities before commencement of works; Ensure access to significant sites for Aboriginal use; Provide interpretation of significant sites where appropriate; Maintain on-going consultation with local elders and Office of Environment & Heritage. Proactively manage Native Title issues.

6.11 Holiday Vans and Long Term Residents

Holiday vans are those owned by individuals and families which, under agreement, may be located in the Holiday Park for the payment of an annual fee. The owner of a Holiday Van is entitled to a maximum of 180 days use in any 12 month period, with the Park Managers able to issue three (3) months notice at any time for the Van to be removed. The tenure arrangements for holiday vans are subject to the provisions of the *Holiday Parks (Long Term Casual Occupation) Act 2002*. At Silver Sands there are currently 147 sites allocated to holiday vans and long-term residence. While this proportion of sites conforms to the requirements of the Crown Lands Caravan Parks Policy Silver Sands Holiday Park occupies a significant Crown reserve which has been set aside for the purpose of Public Recreation. The characteristics of the land and its location are such that the vast majority of sites in this Park are "prime tourist sites". This is confirmed by the demand for sites and accommodation in the Park by tourists throughout the year. In recognition of the values associated with this Reserve, whenever a holiday van or long term site is vacated or relinquished, that site will be made available for tourist use

The proposed Improvement Plan for Silver Sands requires the removal of holiday vans to allow for the development of facilities that are critical to the long term financial outcomes for the business. The structure of the proposed Improvement Plan is such that this process will be progressive with lead times to allow the Trust and the Park Managers to inform van owners.

The text included in this document in relation to holiday vans is provided for information purposes only. Ministerial consent is not required for any action in relation to holiday vans, and the adoption of this Plan of Management does not authorise the removal of these vans by the Trust. However, the Trust is authorised by legislation to manage the number of holiday vans within the park. The removal of any or all holiday vans will be determined solely by the NSW Crown Holiday Parks Trust as an operational matter in accordance with the applicable legislation.

6.12 Authorised Activities and Works

A range of measures have been identified as required to implement this Plan of Management to ensure the Silver Sands Holiday Park is improved and managed in accordance with the Principles of Crown Land Management. These improvements and actions are identified and described in Sections 5 and 6 of this Plan of Management and in Drawings SS-02 to SS–04.

At the completion of the Improvement Program the Silver Sands Holiday Park will supply a total of 482 long term and short term dwelling sites and 5 campsites for residents and guests in accordance with the relevant regulatory controls. The respective numbers of dwelling sites and campsites in the Northern and Riverside Precincts at the completion of the proposed development and improvement program will be as follows;

Northern Precinct			
Site type	Number of sites		
Long Term	43		
Short Term	293		
Total	336		
Riverside Precinct			
Site type	Number of sites		
Short Term	146		
Campsites	5		
Total	151		
Silver Sands Total Sites	487		

The required improvements and works are itemised below under each of the relevant Management Precincts and are authorised pursuant to Clause 65(2) of SEPP Infrastructure 2007.

Management Precinct	Authorised Activities and Improvements
Management Precinct Northern	Demolition; road works; bridge over stormwater swale; reconfiguration of site layout and site boundaries; storm water drainage works; underground utility service installation; construction of a water play area and pool; children's playground; development of camp kitchen and guest lounge; installation of relocatable homes(manager's residence, office, cabins and safari tents) on various sites as required to meet the needs of the Park's clientele in accordance with the caravan park regulations; renovations and alterations to the existing manager's residence;
	construction of storage and maintenance sheds; fencing; landscaping; vegetation management; installation of signage and flagpoles; subdivision and lot boundary adjustments.
Central	Demolition; road works; construction of parking areas; decommission existing approved sites and rehabilitate the vacated area; storm water drainage; construction of pedestrian pathways and cycle ways; underground utility service installation; construction of picnic shelters; upgrade kiosk including renovations and alterations to the existing building; renovations, alterations and additions to existing communal amenities; construction of an amphitheatre including excavation, retaining walls and paving; fencing; landscaping; and vegetation management; installation of signage and flagpoles; subdivision and lot boundary adjustments.
Riverside	Demolition; removal of existing tennis courts and clubhouse and rehabilitation of the vacated area; road works; reconfiguration of site layout and site boundaries; underground service installation; installation of relocatable homes(cabins and safari tents) on various sites as required to meet the needs of the Park's clientele in accordance with the caravan park regulations; installation of relocatable amenities; construction of a Park entrance from MacDonald Street and installation of boom gates; vegetation management; fencing; installation of signage and flagpoles; landscaping; subdivision and lot boundary adjustments.

7 IMPLEMENTATION AND REVIEW

This Plan of Management has been prepared pursuant to the provisions of the *Crown Lands Act 1989* to provide an appropriate statutory basis for the continuing improvement and operation of the Silver Sands Holiday Park and associated reserved Crown land.

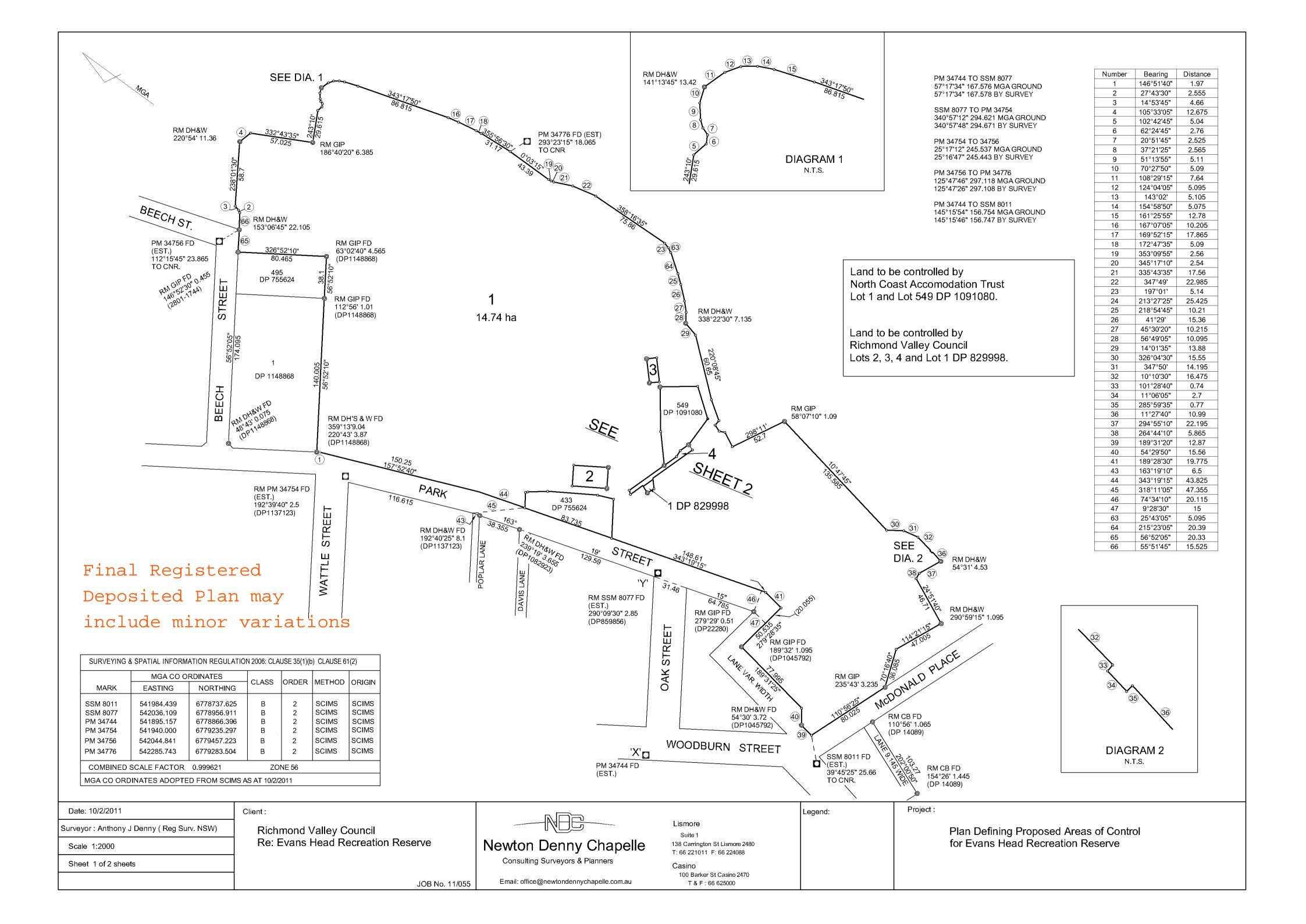
This Plan provides a medium term strategy for the management and improvement of the Silver Sands Holiday Park. It is anticipated the majority of the works described will be implemented over a five year period. Priorities for works and funding are to be addressed on an annual basis to meet development priorities and community needs.

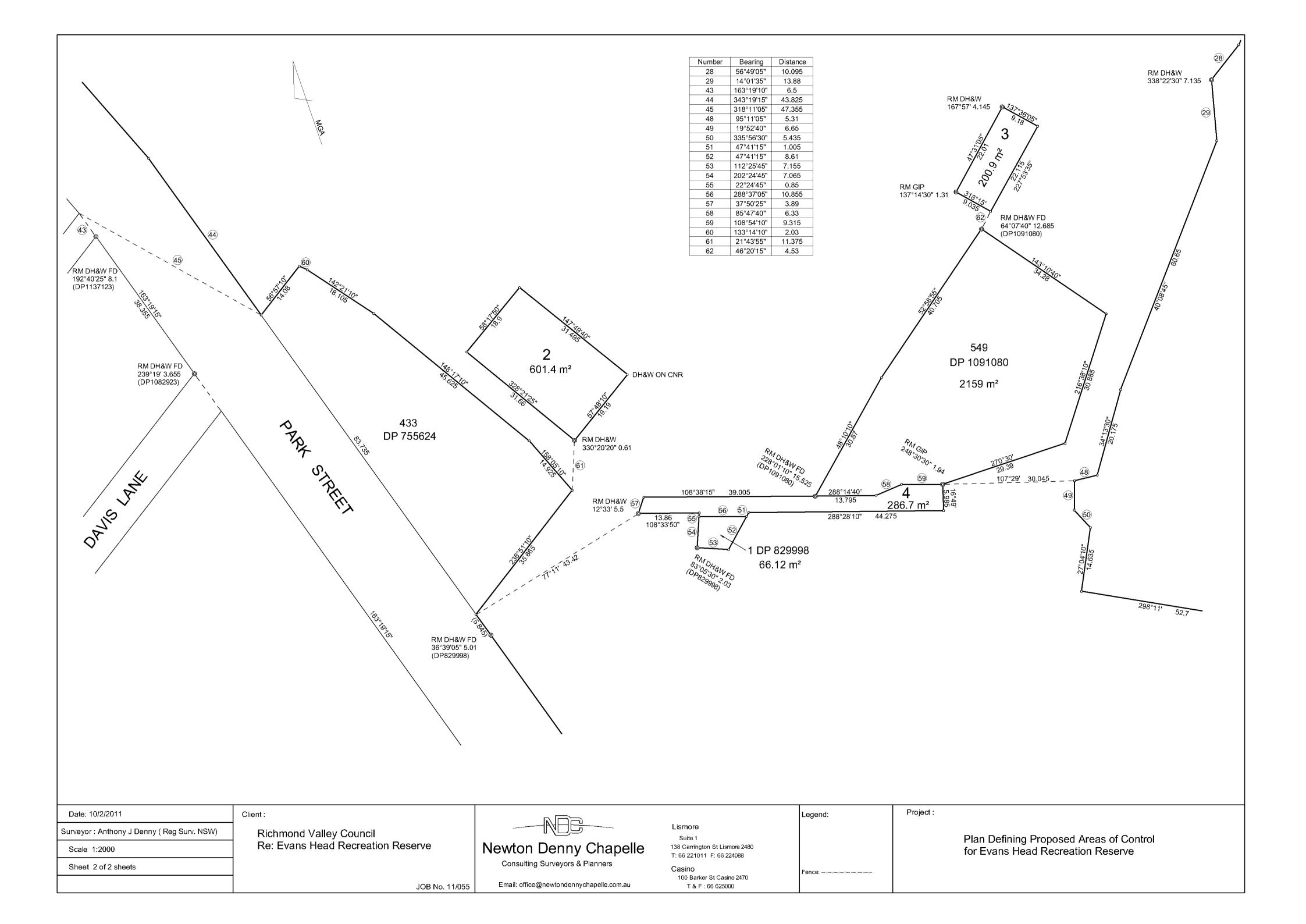
Progress in relation to the implementation of the Plan will be monitored by the Trust and the Trust will report on an annual basis to the Department of Primary Industries, Lands.

This Plan is to be reviewed approximately every five years or as required to ensure it continues to be relevant to and consistent with government legislation and policy and community expectation.

APPENDIX A

Survey Diagram – Proposed Consolidation of Existing Lots





APPENDIX B

Section 68 Approval to Operate a Caravan Park

Council Reference: P1001587 - Licensing - PC:BM

Telephone enquiries to: Peter Cotterill

Date of Issue 17 May 2012

Date of determination : 17 June 2010 (alley of Surprises!

The Director North Coast Accommodation Trust Silver Sands Holiday Park P O Box 647 **BALLINA NSW 2478**

ATTENTION: Mr Colin Woodbry

Dear Mr Woodbry

NOTICE TO APPLICANT OF DETERMINATION OF AN APPLICATION TO OPERATE A CARAVAN PARK AND CAMPING GROUND - AMENDED

APPLICANT:	North Coast Accommodation Trust
PREMISES:	Reserve R82910, Park Street, Evans Head
KNOWN AS:	Silver Sands Holiday Park
OPERATOR:	North Coast Accommodation Trust

DATE FROM WHICH AMENDED APPROVAL OPERATES: 1 July 2010

NUMBER OF SITES AND FACILITIES TO WHICH THIS AMENDED APPROVAL RELATES:

SITES: The allocation and layout of sites is as shown on the community map which is 1. annexed to this approval.

Maximum number of sites approved for this development 579

A. Main Accommodation Area

LONG TERM SITES a) Permanent (self contained)	45
TOTAL long term sites	45
SHORT TERM SITES	
a) Holiday vans	103
b) Park cabins	23
c) Ensuite sites	56
d) Tourist sites (powered)	128
e) Camp sites (unpowered)	16
TOTAL short term sites	326

All correspondence should be addressed to:

The General Manager,

RICHMOND VALLEY COUNCIL

Administration Office: Cnr. Walker St. & Graham Place (Locked Bag 10) CASINO NSW 2470

B. Riverside Recreation Area

This area is used at the Easter and Christmas holiday periods and for major cultural or recreational events.

Total number of long term sites Powered sites Camp sites	Nil 70 138
TOTAL number short term sites	208
TOTAL park numbers Long terms Short term	45 533

2. FACILITIES:

Hodgies Amenities Building

Men's	Showers Hand basins Water Closets Urinal	8 8 6 1 x 4.0 metres long
Ladies	Showers Hand Basins Water Closets	8 8 8
Laundry	Washing machines Dryers Ironing boards Laundry tubs Clothes line	4 2 0 7 250 metres
Visitor Toilets	Water Closets Hand Basins	2 2
Adam & Eve Amenit	es Building	
Men's	Showers Hand basins Water closets Urinal	6 6 5 1 x 1.6 metres long
Ladies	Showers Hand basins Water closets	5 6 6
Laundry	Washing machines Dryers Ironing boards Laundry tubs Clothes line	4 2 1 6 336 metres
Disable unit/family roc		1
Visitors Toilets	Water Closets Hand Basins	2 2

Pipi Bill Amenities Building

Men's	Showers Hand basins Water Closets Urinal	6 4 4 1 x 2.0 metres long
Ladies	Showers Hand basins Water closets	6 4 6
Laundry	Washing machines Dryers Ironing boards Laundry tubs Clothes lines	4 2 0 4 336 metres
Laundry Facilities fo	r En-Suite Area	
	Washing machines Dryers Ironing boards Laundry tubs Clothes line	4 2 2 112 metres
BBQ Area Toilets		
Men's	Water closets Hand basins	2 1
Ladies	Water closets Hand basins	2 1
Recreation reserves	Southern Block – Taj Mahal	
Men's	Showers Hand basins Water closets Urinal	5 8 5 2 x 1.8 metres long
Ladies	Showers Hand basins Water closets	5 8 7
Laundry	Washing machines Dryers Ironing boards Laundry tubs Clothes line	4 2 2 336 metres
Disable unit/family room		1

Riverside Amenities and Public Toilet Block

Caravan Amenities		
Men's	Water Closets	3
	Hand Basins	4
	Showers	6
	Urinal	1 x 2.4m
Ladies	Water Closets	6
	Hand Basins	4
	Showers	6
Public Toilets		
Men's	Water Closets	1
	Hand Basins	2 2
	Showers	
	Urinal	1 x 1.5m
Ladies	Water Closets	2
	Hand Basins	2
	Showers	2
Disable Unisex Toilets		2
	•	

In accordance with the requirements of Chapter 7 of the Local Government Act, 1993, notice is hereby given of the determination by Council of the subject application.

The application has been determined by the **GRANTING OF APPROVAL** subject to conditions. The conditions and reasons for imposition of each condition follows.

1. The caravan and camping ground must be designed, constructed, maintained and operated in accordance with the relevant requirements of Divisions 1-5 of Part 3 of the Regulation.

Reason: to comply with clause 8 & 71 of the Regulation.

2. The annual levy for the caravan park and camping ground must be paid in accordance with the requirements of the Local Government.

Reason: to comply with Council's requirements

- 3. a) A person must not be permitted to stay in a moveable dwelling that occupies a short-term site or camp site for a total of more than 150 days in any 12 month period, unless the moveable dwelling is a holiday van and the person is the owner of that holiday van.
 - b) The owner of a holiday van that occupies a short-term site or camp site must not be permitted to stay in the holiday van for a total of more than 180 days in any 12 month period.
 - c) The owner of a holiday can that occupies a short-term site or camp site must not be permitted to stay in the holiday van for more than 150 consecutive days in any 12 month period.

Reason: to comply with clause 73 of the Regulation.

4. Access roads and access ways to all sites must be maintained to a standard that permits all weather access and without any dust nuisance.

Reason: to ensure that adequate vehicular access is provided.

5. All long-term, short-term and camp sites must be numbered and site boundaries clearly delineated in a conspicuous manner.

Reason: to comply with clause 86 of the Regulation.

- 6. Appropriate signage must be provided in conspicuous locations as follows:
 - i) at or near the entrance to the Caravan Park identifying the caravan park and providing contact information for residents;
 - ii) provide at least one (1) sign on the access road and near the entrance indicating that the speed limit must not exceed 15 kilometres per hour.

Reason: to identify the caravan park and to comply with clauses 95 of the Regulation.

7. The access roads must be adequately lit between sunset and sunrise.

Reason: to comply with clause 26 of the Regulation.

8. Adequate garbage removal facilities and servicing must be provided at all times to ensure clean and sanitary conditions are maintained in the caravan park.

Reason: to comply with clause 127 of the Regulation.

9. All fire hose reels must be installed and be maintained in accordance with the requirements of AS/NZS1221:1997 and AS2441:1988.

The fire hose reels must be installed so that each site can be reached by a fire hose.

Reason: to comply with clause 129 of the Regulation.

10. A copy of the community map, this approval for the caravan park and camping ground, and a copy of the Regulation must be conspicuously displayed on the premises.

Reason: to inform residents of the nature of the approval.

- 11. The caravan park and camping ground must not be used:
 - a) for any commercial purpose other than a caravan park or camping ground or associated purpose; or
 - b) for the manufacture, construction or reconstruction of moveable dwellings.

Reason: to comply with clause 124 of the Regulation.

12. The caravan park and camping ground and all dwellings and camp sites must be maintained in a clean and tidy condition at all times.

Reason: to ensure that the amenity of the premises are maintained in a satisfactory manner.

13. The management of the caravan park and camping ground must be strictly in accordance with the requirements contained in Division 5 of the Regulation.

Reason: to reinforce the management provisions of the Regulation.

14. Provide prominent site numbering to all sites within the caravan Park

Reason: to comply with clause 86 of the Regulations

15. Provide recent copies of certificates that all hose reels and portable fire extinguishers have had annual certification.

Reason: to comply with clause 129 of the Regulation.

DEVICES

- II A reference to the Regulation in this approval refers to the Local Government (Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 1995.
- Π Council may carry out inspections of the premises to measure compliance with the approval and the Regulation.
- Π Council will charge fees in relation to the exercise of its regulatory functions and these fees will be reviewed on an annual basis.
- The total number and allocation and layout of the sites, and the infrastructure of the caravan park and camping ground, as shown on the community map annexed to this approval, must not be altered except with the written approval of Council.

LAPSING OF APPROVAL

This approval lapses on 30th June, 2015 or until such time it is amended, modified or revoked under the relevant provisions of the Local Government Act, 1993.

REVIEW OF DETERMINATION

Under the provisions of Section 100 of the Local Government Act, 1993, an applicant may request the Council to review the determination of the application. The request for a review must be made within twenty eight (28) days after the date of determination.

DISSATISFACTION WITH DETERMINATION - RIGHT OF APPEAL

Under the provision of Section 176 of the Local Government Act, 1993, an applicant who is dissatisfied with the determination of Council with respect to the application for an approval may appeal to the Land and Environment Court. The appeal must be made within twelve (12) months after the date from which the approval operates.

FURTHER INFORMATION

If you require further information in relation to this approval please contact Council's Environmental Health Officer – Kieran Wade between 8.30am and 10.30 am Wednesday to Friday on 6660 0271 or at other times during Council's office hours by appointment.

Yours faithfully

J

Peter Cotterill MANAGER ENVIRONMENT, HEALTH AND REGULATORY CONTROL

DRAWINGS

SS – 01	Silver Sands Holiday Park – Existing Site Plan
SS – 02	Silver Sands Holiday Park – Proposed Development and Improvement Plan
SS – 03	Silver Sands Holiday Park – Proposed Development and Improvement Plan - Central Precinct and Riverside Precincts
SS – 04	Silver Sands Holiday Park – Concept Plans for Proposed Facilities

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- NORTHERN PRECINCT EXISTING ENTRY AND EXIT IS NOT CENTRAL TO THE OVERALL OPERATION OF THE PARK AND REMOTE FROM THE RIVERSIDE PRECINCT. EXISTING MANAGER'S RESIDENCE AND OFFICE IS NOT IN THE BEST LOCATION AND THE RECEPTION AREA IS INADEQUATE FOR THE SIZE OF 2 THE HOLIDAY PARK. STORAGE AND MAINTENANCE FACILITIES ARE INADEQUATE IN TERMS OF AREA, SECURITY AND LOCATION. 3

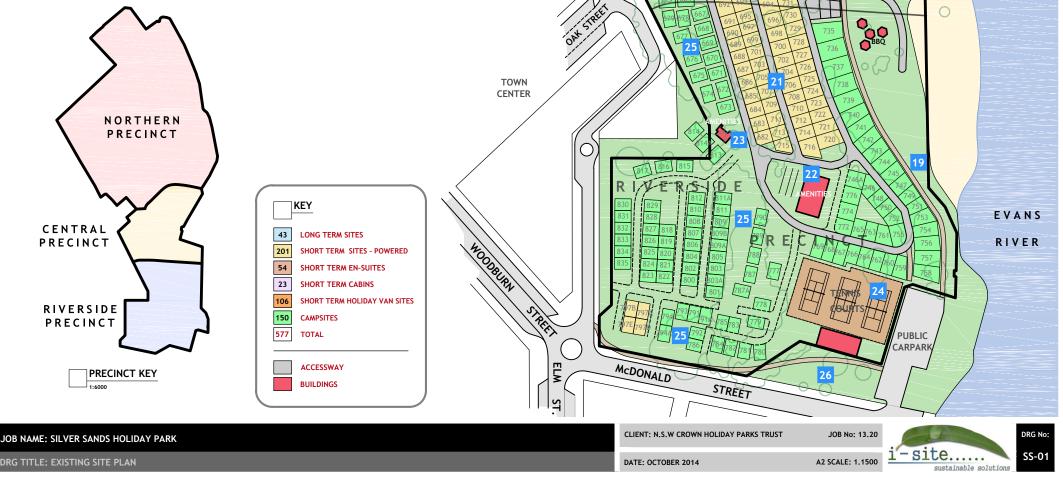
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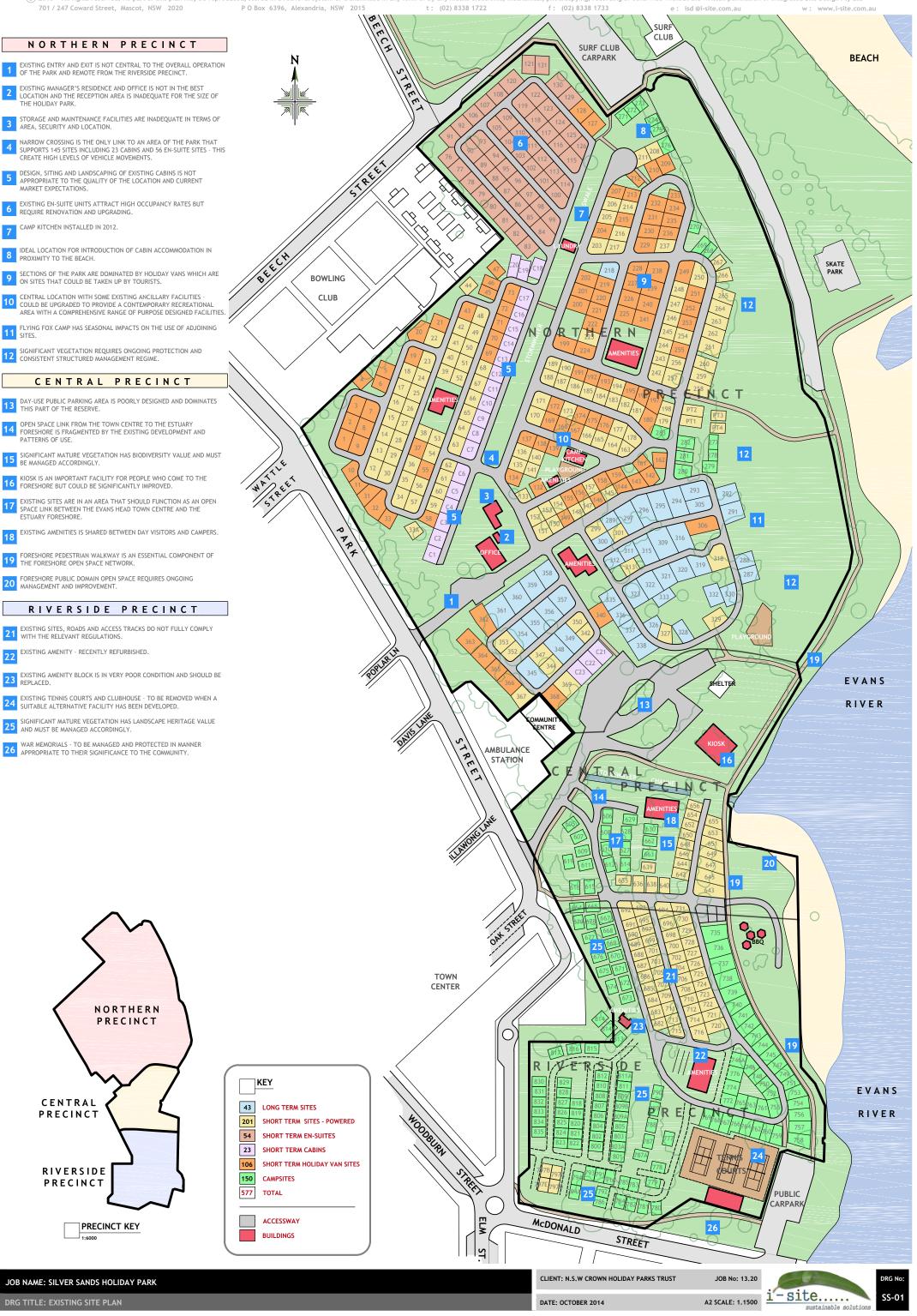
 - PROXIMITY TO THE BEACH.
 - 9 SECTIONS OF THE PARK ARE DOMINATED BY HOLIDAY VANS WHICH ARE ON SITES THAT COULD BE TAKEN UP BY TOURISTS.
 - 10

- 13 THIS PART OF THE RESERVE.
- PATTERNS OF USE.
- 15
- 16
- 18
- 19 FORESHORE PEDESTRIAN WALKWAY IS AN ESSENTIAL COMPONENT OF THE FORESHORE OPEN SPACE NETWORK.
- 20

- 21
- 22

- 26 APPROPRIATE TO THEIR SIGNIFICANCE TO THE COMMUNITY.





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THE NORTHERN PRECINCT WILL BE FOCUSED ON FULFILLING THE NEEDS OF THE PARK'S TOURIST CLIENTELE AND ESTABLISHING AN AMBIENCE CHARACTERISTIC OF A COASTAL HOLIDAY DESTINATION. THE AIM FOR THIS PRECINCT IS TO SUPPORT SITES, ACCOMMODATION AND FACILITIES FOR TOURISTS. NEW CABINS WILL BE INSTALLED AND THE EXISTING CABINS WILL BE UPGRADED AND IN SOME INSTANCES REPLACED OVER THE NEXT FIVE TO TEN YEARS. NEW CABINS WILL INCLUDE UNITS DESIGNED TO CATER FOR PEOPLE WITH DISABILITIES. THE NUMBER OF HOLIDAY VANS IN THE PRECINCT WILL BE PROGRESSIVELY REDUCED TO ALLOW FOR IMPROVEMENTS TO BE UNDERTAKEN AND TO MAINTAIN THE

- CARRIAGEWAY
- PARK REGULATIONS.
- DIRECT LINK INTO THE PARK FOR SERVICE VEHICLES ONLY.
- UNDERTAKE ALTERATIONS AND RENOVATIONS TO THE EXISTING
- DEMOLISH EXISTING SHEDS AND STORAGE AREA AND ESTABLISH SHORT
- CLOSE A SECTION OF EXISTING ROAD, DEMOLISH EXISTING OLD AMENITIES AND REMOVE HOLIDAY VANS AND EXISTING SITES.
- PROGRESSIVELY IMPROVE AND REPLACE EXISTING OLDER CABIN STOCK.
- 11 CIRCULATION AND ACCESS.
- MANAGEMENT PLAN FOR THE PARK.

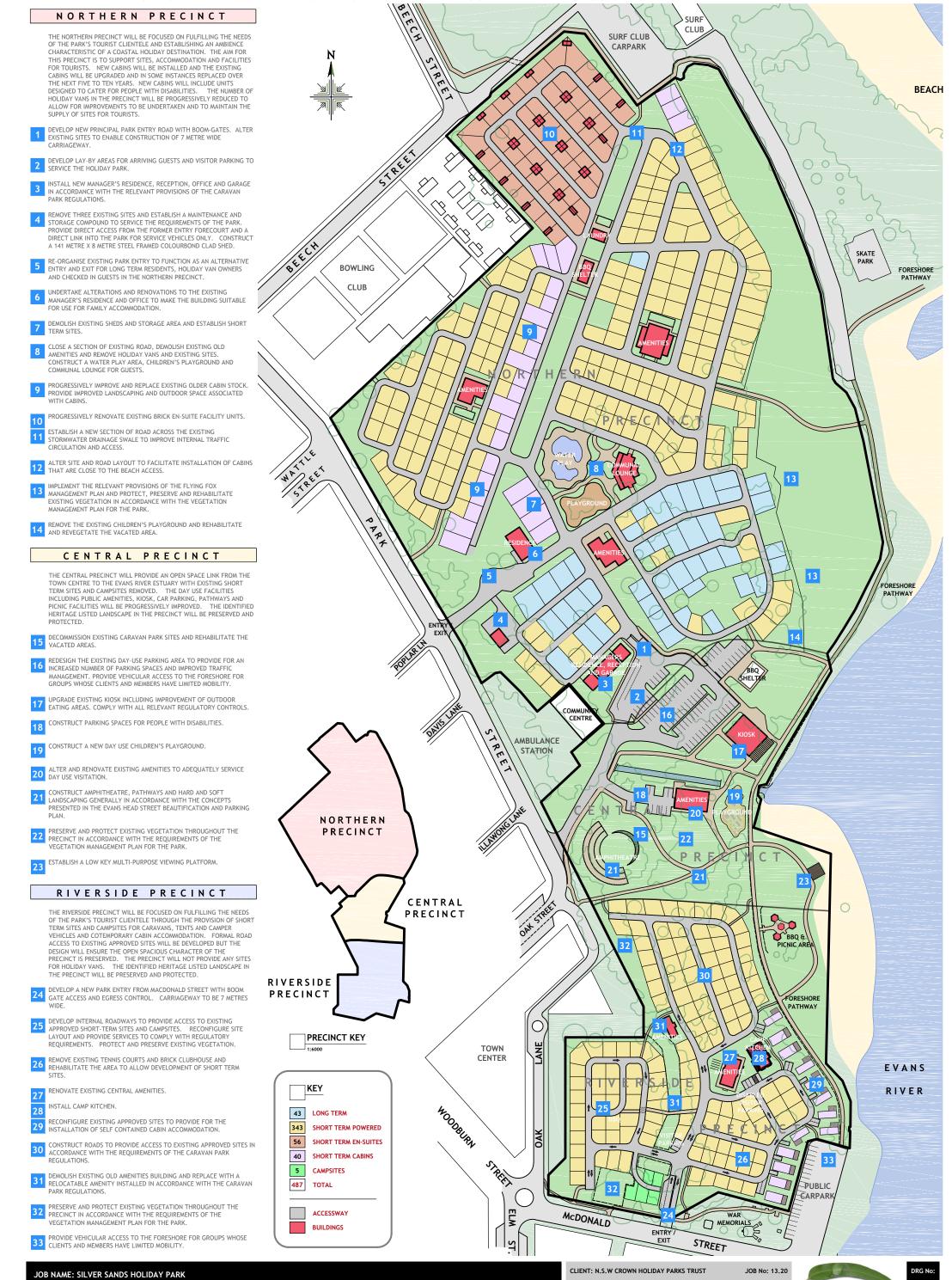
TERM SITES AND CAMPSITES REMOVED. THE DAY USE FACILITIES ICLUDING PUBLIC AMENITIES, KIOSK, CAR PARKING, PATHWAYS AND PICNIC FACILITIES WILL BE PROGRESSIVELY IMPROVED. THE IDENTIFIED HERITAGE LISTED LANDSCAPE IN THE PRECINCT WILL BE PRESERVED AND PROTECTED.

- GROUPS WHOSE CLIENTS AND MEMBERS HAVE LIMITED MOBILITY.
- 17

- CONSTRUCT AMPHITHEATRE, PATHWAYS AND HARD AND SOFT LANDSCAPING GENERALLY IN ACCORDANCE WITH THE CONCEPTS 21
- 22

VEHICLES AND COTEMPORARY CABIN ACCOMMODATION. FORMAL ROAD FOR HOLIDAY VANS. THE IDENTIFIED HERITAGE LISTED LANDSCAPE IN THE PRECINCT WILL BE PRESERVED AND PROTECTED.

OP A NEW PARK ENTRY FROM MACDONALD STREET WITH BOOM



JOB NAME: SILVER SANDS HOLIDAY PARK	CLIENT: N.S.W CROWN HOLIDAY PARKS TRUST	JOB No: 13.20	DRG No:
DRG TITLE: PROPOSED DEVELOPMENT AND IMPROVEMENT PLAN	DATE: OCTOBER 2014	A2 SCALE: 1.1500	i-site ss-02

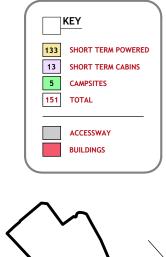
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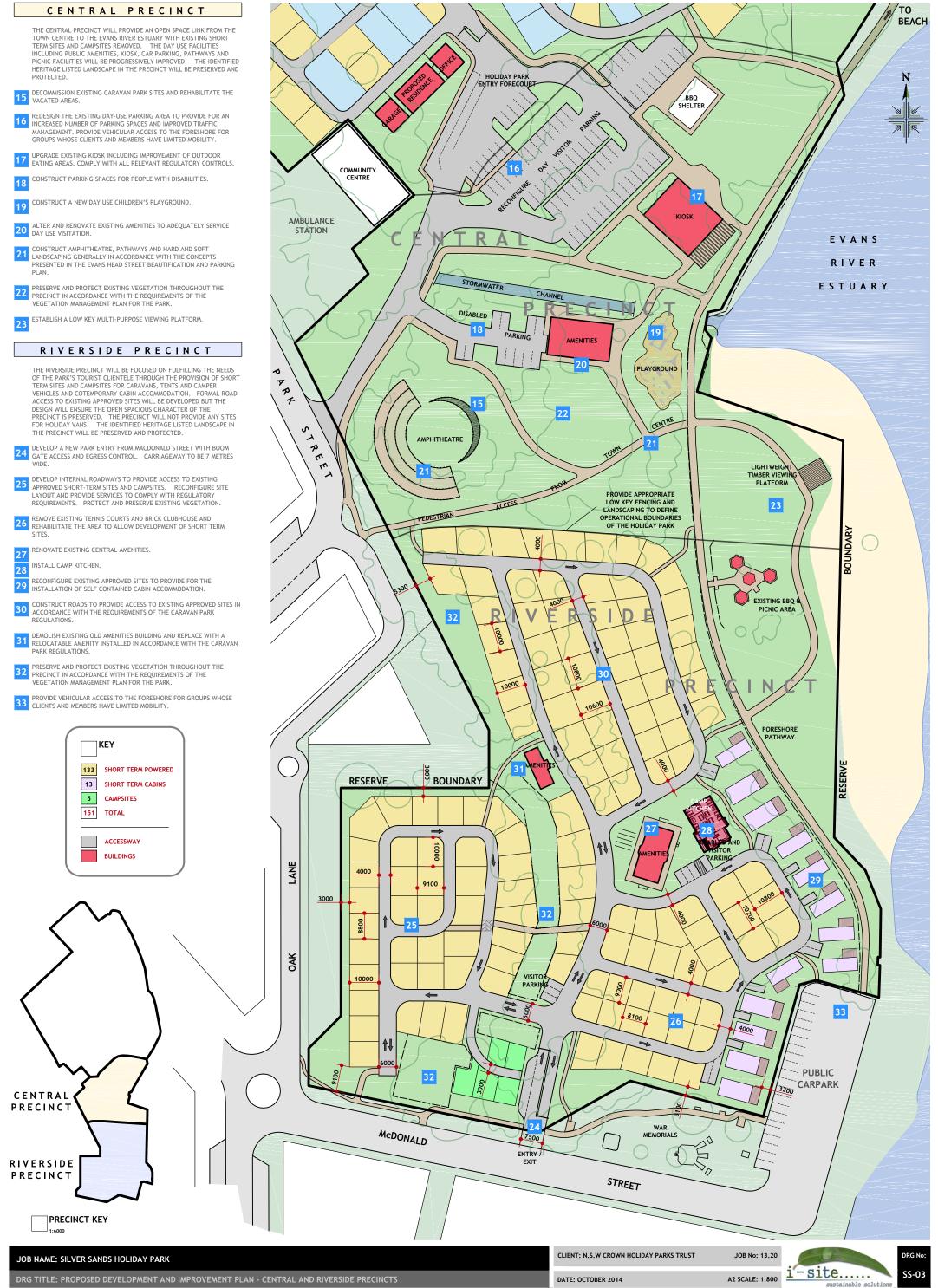
THE CENTRAL PRECINCT WILL PROVIDE AN OPEN SPACE LINK FROM THE TOWN CENTRE TO THE EVANS RIVER ESTUARY WITH EXISTING SHORT TERM SITES AND CAMPSITES REMOVED. THE DAY USE FACILITIES INCLUDING PUBLIC AMENITIES, KIOSK, CAR PARKING, PATHWAYS AND PICNIC FACILITIES WILL BE PROGRESSIVELY IMPROVED. PROTECTED.

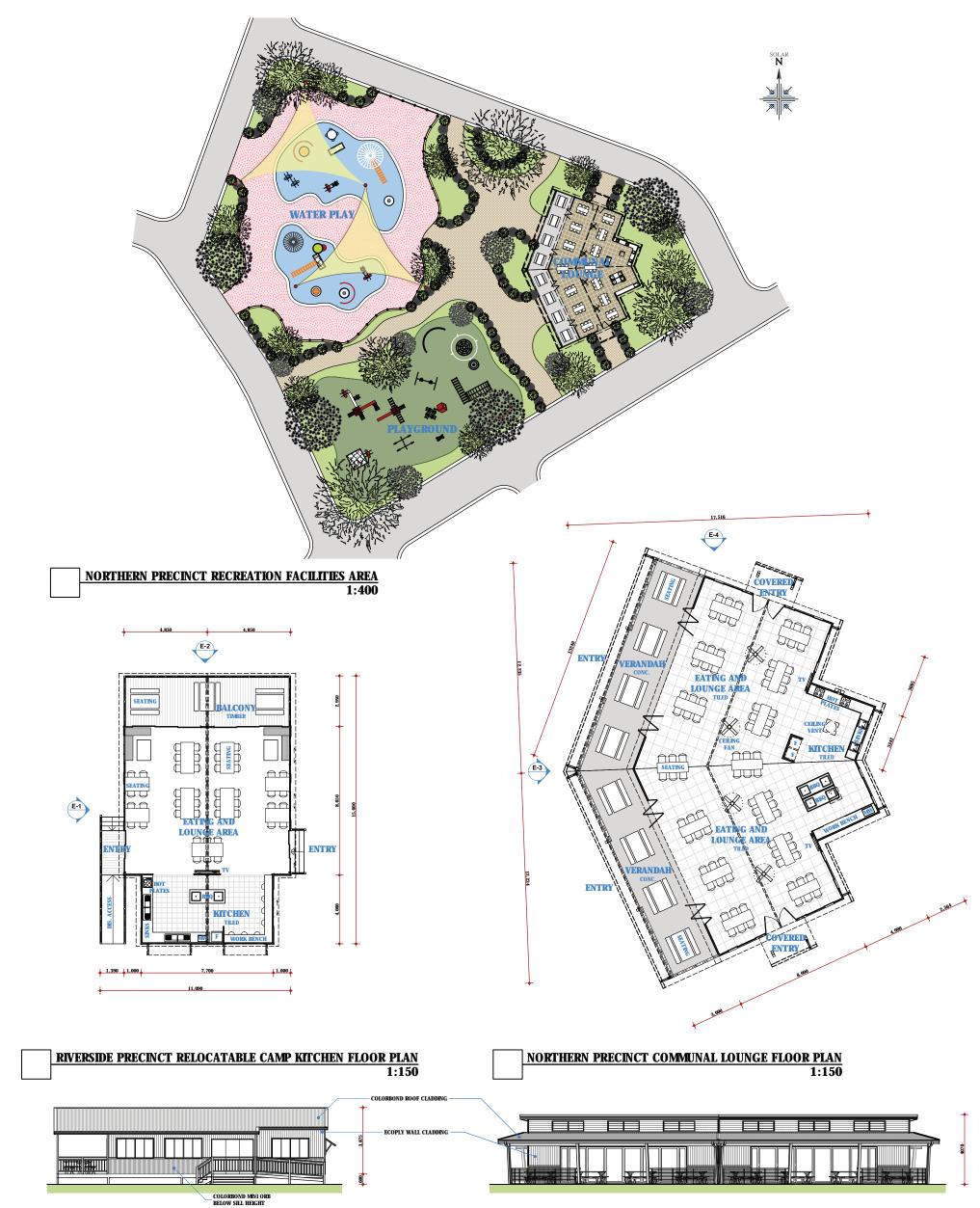
- 21 PLAN.
- ESTABLISH A LOW KEY MULTI-PURPOSE VIEWING PLATFORM.

VEHICLES AND COTEMPORARY CABIN ACCOMMODATION. FORMAL ROAD ACCESS TO EXISTING APPROVED SITES WILL BE DEVELOPED BUT THE DESIGN WILL ENSURE THE OPEN SPACIOUS CHARACTER OF THE PRECINCT IS PRESERVED. THE PRECINCT WILL NOT PROVIDE ANY SITES FOR HOLIDAY VANS. THE IDENTIFIED HERITAGE LISTED LANDSCAPE IN THE PRECINCT WILL BE PRESERVED AND PROTECTED.

- 30 ACCORDANCE WITH THE REQUIREMENTS OF THE CARAVAN PARK
- 32 PRECINCT IN ACCORDANCE WITH THE REQUIREMENTS OF THE







ELEVATION E-1 1:150



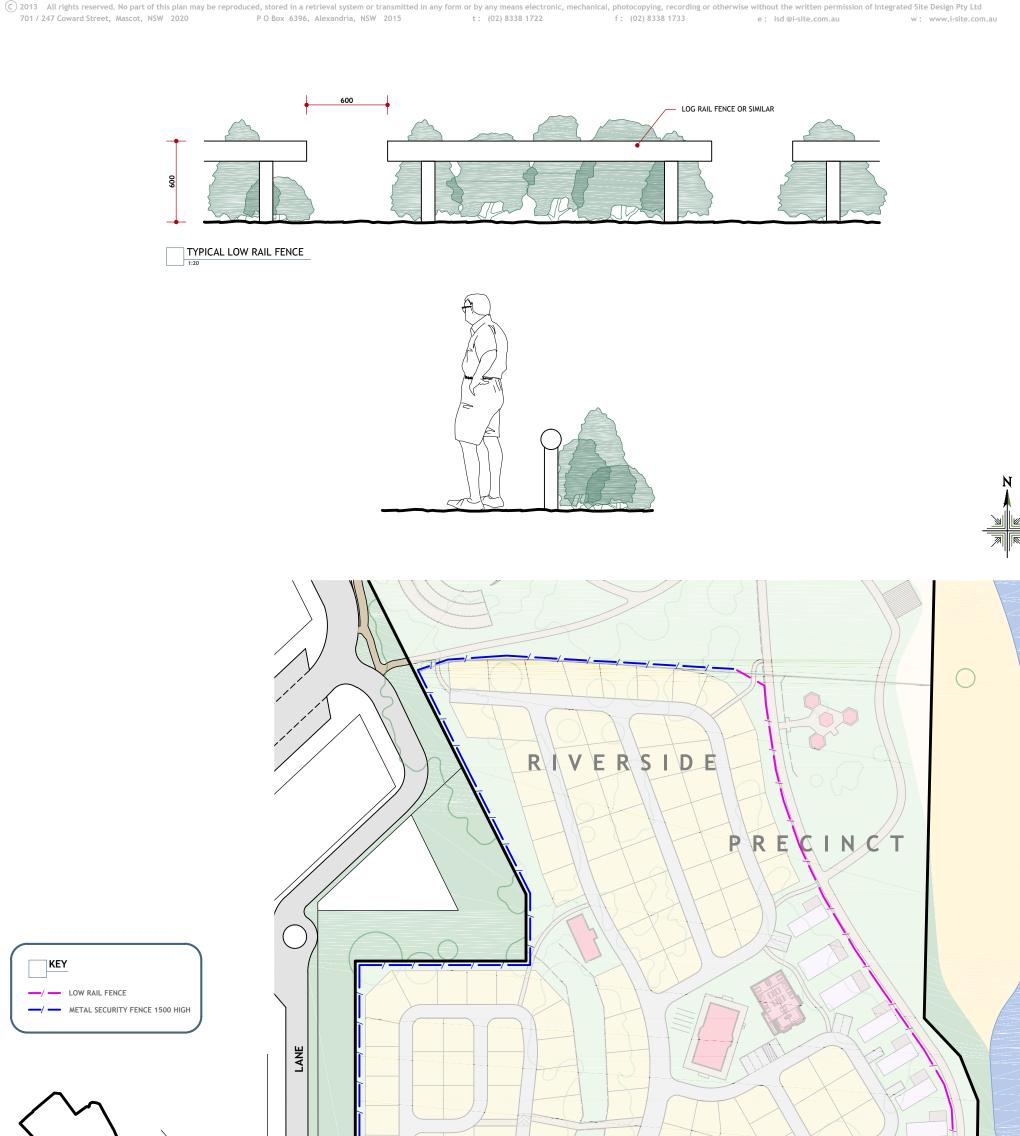




ELEVATION E-2 1:150











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