PLAN OF MANAGEMENT

for

Part of Reserve 53519 for Public Recreation (SEAL ROCKS HOLIDAY PARK)





prepared for the MID NORTH COAST ACCOMMODATION TRUST and



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MID NORTH COAST ACCOMMODATION TRUST

prepared by

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CONTENTS

1	PR	EAMBLE	1
	1.1	INTRODUCTION	1
	1.2	BACKGROUND	
	1.3	MID NORTH COAST ACCOMMODATION TRUST	2
	1.4	OBJECTIVES FOR THIS PLAN OF MANAGEMENT	3
	1.5	PUBLIC EXHIBITION OF THE DRAFT PLAN OF MANAGEMENT	
	1.6	ADDITIONAL CONSULTATION	
	1.7	AMENDMENTS TO THE DRAFT PLAN OF MANAGEMENT	6
2	DE	SCRIPTION OF THE RESERVE	
	2.1	LOCATION AND STATUS	
	2.2	EXISTING CARAVAN PARK DEVELOPMENT	9
3.	ST	ATUTORY FRAMEWORK	
	3.1	INTRODUCTION	12
	3.2	CROWN LANDS ACT 1989	12
	3.3	THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979	13
	3.4	THE LOCAL GOVERNMENT ACT 1993	13
	3.5	RURAL FIRES ACT 1997.	
	3.6	THE RESIDENTIAL PARKS ACT 1998	15
	3.7	HOLIDAY PARKS (LONG-TERM CASUAL OCCUPATION) ACT 2002	15
	3.8	RELEVANT ENVIRONMENTAL PLANNING POLICIES	
	3.9	GREAT LAKES LOCAL ENVIRONMENTAL PLANS	20
	3.10	OTHER PLANNING REGULATIONS, CONTROLS AND STRATEGIES	23
	3.11	OTHER STATUTORY AND POLICY DOCUMENTS	
	3.12	SUMMARY	26
4.	RE:	SOURCES AND VALUES	
	4.1	RESOURCES	27
	4.2	VALUES	27
5.	MA	NAGEMENT OVERVIEW	28
	5.1	INTRODUCTION	28
	5.2	VISION STATEMENT	28
	5.3	MANAGEMENT PRINCIPLES	28
	5.4	MANAGEMENT ISSUES	29
	5.5	VEGETATION MANAGEMENT	31
	5.6	BUSHFIRE PLANNING AND PROTECTION	32
	5.7	PROPOSED IMPROVEMENTS – Drawing SR – 03A	33
	5.8	DESCRIPTION OF THE PROPOSED IMPROVEMENTS	34
	5.9	SUSTAINABLE USE OF RESOURCES	38
	5.10	ASSESSING PROPOSED IMPROVEMENTS	38
	5.11	FINANCING IMPROVEMENTS	39
6.	MA	NAGEMENT ACTIONS	40
	6.1	NATURAL ENVIRONMENT	40
	6.2	CULTURAL VALUES	42
	6.3	RECREATION	
	6.4	ACCOMMODATION	44
	6.5	UTILITY SERVICES	45
	6.6	PUBLIC SAFETY	46

6.7 PARK INFO	DRMATION47
	ED MANAGEMENT47
	ED ACTIVITIES AND WORKS49
	Y VANS50
7. IMPLEMENTATI	ON AND REVIEW51
Appendix 1	Summary of the Issues Raised in Submissions Received in Response to
	Public Exhibition of the Draft Plan of Management
Appendix 2	Minutes of Information Meeting of 15 th March 2012
т фр	g or
Appendix 3	Submission from the National Parks and Wildlife Service
Appendix 4	Draft Fire Mitigation Plan
••	
Appendix 5	Seal Rocks Littoral Rainforest, Seal Rocks Rd, Seal Rocks, NSW,
	Australia - extract from the Register of the National Estate
Appendix 6	Drawings
SR 00	Survey Plan of Existing Facilities, Site Layout and Land Boundaries
SR 01	Context Plan - Zoning and Bushfire Prone Land
SR 02	_
	Existing Holiday Park Site Plan
SR 03	Proposed Site Plan as placed on public exhibition on 23 rd March 2010
SR 03A	Proposed Improvement Plan
SR 04	Proposed Overall Site Plan including Western Precinct

1 PREAMBLE

1.1 INTRODUCTION

This Plan of Management has been prepared in accordance with the relevant provisions of the Crown Lands Act 1989 to provide a framework for the future management, use and improvement of the reserved Crown Land known as Seal Rocks Holiday Park. The Holiday Park is situated within Reserve 53519 which is reserved for Public Recreation and was notified on 19th September 1919. The Mid North Coast Accommodation Trust is the appointed manager of the Reserve Trust and the Holiday Park. Drawing SR-00 in Appendix 6 identifies the boundaries of Lot 506 in DP 1111033 which is the land that is the subject of this Plan of Management.

The purpose of this Plan of Management is to establish objectives, strategies and actions and identify the means the Trust will employ in the management of the land, the Reserve Trust and the Holiday Park. Consequently the Plan of Management outlines a management direction for the next 10 years for those areas. The Plan also establishes management strategies and actions to address the needs and expectations of the local and wider community and the travellers who visit and use the Reserve and its facilities.

Implementation of the Plan will lead to the following outcomes:

- Improved and sustainable resource management;
- Enhanced environmental and social outcomes;
- Improved facilities for guests and visitors;
- Improved capacity to respond to any threat or outbreak of fire;
- Improvements to essential infrastructure including wastewater treatment, water supply and power supply;
- Maintenance of the essential character and long term viability of the reserve on which the Holiday Park is situated;
- Improved facilities for the effective and efficient day to day management of the Reserve;
- Maintenance of the Holiday Park as a viable provider of camping and caravan sites and holiday accommodation;
- Improved capacity to address changing community and market demands; and
- Increased local economic activity as a consequence of increased visitation.

1.2 BACKGROUND

Up until 2011 the Great Lakes Council had been the appointed corporate trust manager of the reserved land that supports Seal Rocks Holiday Park. In 2008, Council in its role as the appointed corporate manager of the Reserve Trust resolved to undertake a review

of the Holiday Park business. The purpose was to;

- ensure the Holiday Park and the associated land was managed in a manner that would result in the optimum benefit to the wider community; and
- establish appropriate strategies to guide future improvement and development of the Holiday Park in the context of the on-going management of the foreshore reserved Crown lands at Seal Rocks.

As a consequence the following material was prepared as a pre-cursor to the formulation of this Plan of Management;

- A Business Development Strategy that outlines an integrated and consolidated approach to achieving enhanced environmental, social, economic and physical outcomes for the Holiday Park, and
- A Master Plan for the Holiday Park to guide on-going improvement and development in a way that will achieve overall planning goals that are appropriate to the resources and the capacity of the land.

This work demonstrated there was a range of matters that needed to be addressed with respect to the management of the Holiday Park including environmental issues associated with the land and the existing development as well as legislative and regulatory requirements. These matters have been addressed in this Plan of Management.

Subsequently on 25th February 2011 following discussions and negotiation with Council the Mid North Coast Accommodation Trust was appointed by the Minister for Lands to be responsible for the care control and management of that part of Reserve 53519 for Public Recreation which supports the Seal Rocks Holiday Park. That part of the Reserve to the north of Seal Rocks Road and Kinka Road will continue to be managed by the Great Lakes Council.

1.3 MID NORTH COAST ACCOMMODATION TRUST

The Mid North Coast Accommodation Trust has been appointed by the Minister for Lands under the provisions of the Crown Lands Act 1989 to be responsible for the care control and management of five caravan parks in the Great Lakes local government area. While the key focus of the Mid North Coast Accommodation Trust 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 the Trust has been structured to ensure;

- Crown and 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 managed by the Trust;
- financial and human resources are used efficiently;
- environmental impacts are minimised;
- probity is achieved in the operation of each reserve and/or 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 Reserves and the associated commercial activities delivers ecological sustainability, intergenerational equity and identifiable public benefits.

1.4 OBJECTIVES FOR THIS PLAN OF MANAGEMENT

The objectives for this Plan of Management are to;

- Identify the resources and values of the Reserved lands;
- Recognise the role of the Seal Rocks Holiday Park in providing for the recreational and tourist accommodation requirements of the community and visitors;
- Establish a vision and strategic direction for the future management and improvement of the Reserve and the Holiday Park;
- Propose initiatives that address the legal and policy parameters relevant to the management of the Holiday Park and the coastal reserve;
- Provide for management actions that will protect, conserve and enhance the natural, cultural, scenic, social, recreational and economic values of the Reserve and the Holiday Park;
- Enhance the financial contribution the Holiday Park makes to the management of reserved Crown land and to the local community; and
- Allow for a staged improvement process that will be achievable in terms of planning and financial constraints.

1.5 PUBLIC EXHIBITION OF THE DRAFT PLAN OF MANAGEMENT

The Draft version of this Plan of Management was placed on public exhibition from 23rd March 2010 to 21st May 2010 in accordance with the requirements of Part 5 of the Crown Lands Act 1989. The required exhibition period of 28 days was extended to allow all interested parties adequate time to access and review the documents and

make comment. In response to the exhibition of the Draft Plan a total of 227 written and email submissions were received. One of these submissions was a petition with 324 signatures that expressed a general objection to the Draft Plan. Four submissions were received from organisations; the Myall Lakes Greens(support for a range of improvements but not to the extent proposed in the exhibited Draft Plan), Great Lakes Environmental Association(support for some level of improvement), the Seal Rocks Protection Society(support for a level of improvement but with fewer cabins) and the Save Seal Rocks Committee(generally opposed to the Draft Plan). A number of submissions were received from owners of holiday vans and from residents of Seal Rocks.

A majority of submissions emphasised the importance of preserving the environmental qualities of the Park combined with a concern the Draft Plan was proposing an overdevelopment of the site. Eighty three submissions said the unique character of the Park would be adversely affected if the proposals contained in the Draft Plan were implemented and a further forty eight submissions described the proposed improvement plan as "resort style" and therefore inappropriate.

At the same time many submissions supported the requirement for improvements to the basic standards of infrastructure and facilities. Thirty two submissions said a general upgrade of facilities was required and twenty eight made specific reference to the Park's wastewater treatment system. The construction of a camp kitchen was specifically supported by some respondents along with fundamental improvements to basic amenities and services. A large number of submissions specifically opposed the construction of a swimming pool and a cafe. The following is a brief summary of issues raised by twenty or more submissions;

- The unique character of Seal Rocks will be effected if the Draft Plan is implemented(83);
- The proposed swimming pool is not required(73);
- The Draft Plan proposes a "resort style" development(48);
- Affordability will be reduced(44);
- The focus of the park should be on traditional low cost camping(43);
- Seal Rocks is a place of natural beauty and the proposed improvements will have an adverse impact(38);
- The Park does not need a cafe(37);
- The proposed improvement plan is focussed on increasing economic returns (36);
- The Draft Plan proposes an overdevelopment of the site(32);
- A general upgrade of infrastructure is required(32);
- There was no community engagement during the preparation of the Draft Plan(29);
- The sewerage system should be fixed(28);

- The community does not want the Park to be improved(27);
- The Draft Plan proposals will impact on the social character of the village(24);
- All holiday vans should be retained(21);
- The Park water supply needs to be improved(21); and
- All holiday vans should be removed(20);

In addition people who had a specific personal interest in the Seal Rocks Holiday Park established a Facebook page which attracted a substantial number of followers(in excess of 12,000). If people who joined the Facebook page made any comment it was generally to say Seal Rocks should remain unchanged. It is not possible to establish whether people who joined the Facebook page had read or reviewed the Draft Plan of Management, however, a majority of the comments could be taken to be representative of a general view that said "keep Seal Rocks the same!"

A more complete summary of the issues raised in the written submissions and brief responses to those issues has been included at Appendix 1.

1.6 ADDITIONAL CONSULTATION

In response to issues raised in submissions and in recognition of the management priorities of the Mid North Coast Accommodation Trust a range of amendments were made to the exhibited Draft Plan of Management. Following further representations, primarily on behalf of holiday van owners, an information session outlining proposed revisions to the exhibited Draft Plan of Management was held in the Newcastle office of the Catchment and Lands Division of the Department of Primary Industries on 15th March 2012. The meeting was chaired by the Administrator of the Mid North Coast Accommodation Trust and attended by a representative of the Catchments and Lands Division(refer to Appendix 2 for minutes of the meeting). Two representatives from each of the following groups were in attendance;

- the Myall Lakes Greens;
- the Seal Rocks Protection Society;
- the Save Seal Rocks Committee; and
- holiday van owners.

A presentation gave an overview of the revised plan including proposed changes to the exhibited Draft Plan, supporting financial data and staging of the proposed works. The groups in attendance were given until 11th April (26 days) to make any further submissions to the revised Draft Plan. All groups responded within that time along with twenty individual submissions (16 of from holiday van owners and 4 from local residents). This was as a result of a copy of the revised Plan being placed on the Save Seal Rocks website. Individual submissions were not invited at the information session

and most of the issues raised were the same as those raised following exhibition of the Draft Plan in 2010.

A submission was received on 21st May 2012 from the Great Lakes Area Regional Office of the NSW National Parks and Wildlife Service commenting on the revised Draft Plan. The submission deals with matters of specific interest and relevance to the management of the Myall Lakes National Park and ongoing co-operation and liaison with the Trust and the NPWS Great Lakes Area Office. The submission from the NPWS does not make comment with respect to the scale of the proposed improvements to the Reserve. All matters raised by NPWS have been addressed in the Plan. A copy of the submission is included at Appendix 3.

In combination with the original statutory exhibition of the Draft Plan of Management it is evident that ample opportunity has been provided for input to the proposed future management and improvement of Reserve 53519 for Public Recreation and the Seal Rocks Holiday Park.

1.7 AMENDMENTS TO THE DRAFT PLAN OF MANAGEMENT

Assessment of the existing development and infrastructure of the Seal Rocks Holiday Park has clearly demonstrated a level of change is essential to protect and enhance the ongoing viability of both the Holiday Park and the environment in which it exists. If the Trust is to fulfill its responsibility to undertake the "care, control and management of the reserve" in terms of the requirements of the Crown Lands Act 1989 then improvements to infrastructure, facilities and management services in a number of areas are essential. However, in recognition of the submissions that have been received and on the basis of further detailed analysis it has been accepted that the extent of change and the scale of proposed improvements will be reduced from what was proposed in the Draft Plan.

Therefore elements of the Draft Plan of Management have been amended where appropriate to address issues raised in submissions received in response to the public exhibition of the Draft Plan and consultation that has been ongoing, particularly in recent months. Those changes include;

- removal of the proposal for a swimming pool and new community building;
- removal of the proposal for a café and replacement with a guest lounge:
- reduction in the number of proposed cabins, changes to the siting of cabins and replacement of some cabins with safari tents;
- increase in the number of short-term powered sites for tourists;
- increased setback from Seal Rocks Road for proposed cabins to establish a landscaped buffer area;
- deletion of the northern camp kitchen;

- separate access for service and maintenance vehicles;
- allocation of a dedicated area for management of storm-water overflow;
- fewer sites allocated for holiday vans(reduced from 30 to 16);
- reduction in the number of en-suite sites (from 9 to 4) and replacement with short-term powered sites;
- deletion of dedicated drive thru sites;
- elimination of some changes proposed to the existing site and road layout;
- additional information and requirements with respect to environmental issues;
- inclusion of specific requirements for the Trust to develop comprehensive plans and implement management actions and strategies with respect to vegetation management, sustainability, fire mitigation, consultation with the National Parks and Wildlife Service, landscaping, water supply, wastewater treatment and storm water drainage; and
- additional notation on the drawings to describe the proposed improvements.

The amended Plan will ensure the management of the Reserve and the Holiday Park continues to be focused around providing sites for traditional camping and caravanning. The proposed allocation of sites will provide a total of 88 sites for the placement of caravans, tents or camper vehicles by tourists. This is an increase on the current supply of 82 sites.

The amended Plan now proposes the installation of seven new cabins which will replace existing cabins and result in a total supply of 12 cabins. One of these cabins will be an accessible unit designed to conform to the requirements of the Disability (Access to Premises - Buildings) Standards 2010, Disability Discrimination Act 1992. The supply of cabin accommodation will be complemented through the installation of six "safari tents" which will provide an affordable alternative style of family friendly holiday accommodation. This represents a total supply of on-site accommodation of 18 units compared to a proposed total of 31 cabins in the exhibited Draft Plan. The reduction in the number of proposed cabins has generally enabled the retention of the existing road and site alignment in the affected areas of the Park.

As a result the future improvement of the Reserve and the Holiday Park will deliver a balanced supply of sites and accommodation that will be affordable and accessible with improved availability of sites and accommodation to the wider community. Drawing C - 03 as placed on public exhibition has been included at Appendix 6 to enable comparison.

Importantly the essential components of the Draft Plan have been retained and reinforced in order to protect the environment and conserve the opportunity for sustainable use of the Reserve in providing caravan park and camping ground sites and accommodation.

A range of other amendments have been made as a consequence of more detailed information being available with respect to the existing development of the Park and its infrastructure and to correct minor errors. Matters related to changes to legislation and policies that have occurred since the Draft Plan was exhibited have also been updated.

2 DESCRIPTION OF THE RESERVE

2.1 LOCATION AND STATUS

The Seal Rocks Holiday Park is situated on the Mid North Coast of New South Wales approximately 35km south of Forster. Access is by way of Seal Rocks Road from Bungwahl which is located on The Lakes Way. The settlement of Seal Rocks lies approximately 10km from Bungwahl and the caravan park is located just before the settlement. Except for its frontage to Seal Rocks Road the caravan park boundaries adjoin the Myall Lakes National Park.

The Holiday Park occupies a defined land parcel close to Sugarloaf Bay. The land is within Reserve 53519 which is reserved for Public Recreation and was notified on 19th September 1919.

Drawings SR-00 and SR-01 indicate the area occupied by the Holiday Park and show the general context for the location and management of the Reserve.

2.2 EXISTING CARAVAN PARK DEVELOPMENT

The Holiday Park occupies Lot 506 in DP 1111033 which has an area of approximately 5.29 hectares. The western half of the allotment is steep and heavily vegetated. The Park has been developed primarily on the undulating and flatter lands on the balance of the allotment. This means the Park effectively operates on approximately 2.5 hectares. Its orientation is northerly and the Park enjoys particularly attractive views to the ocean and along the coastline across Sugarloaf Bay towards Blueys Beach.

Vegetation within the National Park on the southern boundary of the Reserve is identified and mapped as littoral rainforest. Over many decades the part of the Reserve which supports the caravan park and camping area has been almost entirely cleared of the native vegetation that would have once existed. This enabled the creation of sites and facilities to support camping and caravanning, installation of cabins and placement of holiday vans. This activity has continued for many decades. The developed area displays the typical attributes of its coastal setting with some relatively level areas, sandy soils with some scattered isolated specimens of existing natural vegetation. There is also a number of more specific landscape plantings.

Seal Rocks was formally licensed as a caravan park following the introduction of Ordinance 71 in 1986. The former Land and Property Management Authority has granted concurrence to Council for the current Section 68 Approval for the Park to have a total of 133 approved sites. These sites are currently allocated as follows:

Long term	Short term			Campsites	Totals
	Drive in tourist	Cabins	Holiday vans	Campsites	Totals
1	26	12	38	56	133

NB. This information is derived from the S68 approval and current park map.

The number of holiday vans is just below the maximum of 50% of the total number of approved long term and short term sites prescribed by the Crown Lands Caravan Parks Policy(1990). However, given the location of the Reserve and the purpose for which the land has been set aside a much lower number would be more appropriate. Existing improvements in the caravan park include;

- Two communal amenity buildings and a separate laundry;
- Two barbecue shelters;
- Manager's residence and office;
- Storage and maintenance facilities;
- Eight self-contained cabins and four basic cabins without en-suite facilities;
- · Wireless internet; and
- Utility service infrastructure.

Drawing SR-02 shows the existing layout of the Park and the current mix of accommodation, allocation of sites and positions of buildings, roads and infrastructure.

The Park's water supply relies on water drawn from the aquifer and rainwater harvesting. The raw water is stored in tanks at a number of locations in the Park. An on-site electro cathodic particle displacement treatment system delivers potable water which is then reticulated throughout the Park via an automated pump network. The quality of the water is monitored under the NSW Health safe drinking water monitoring program. In 2008 Council engaged Douglas Partners to undertake testing to verify the capacity of the aquifer to supply water for the operation of the Park. It was concluded that the future demand for water for the Park would be only 4.3% of the estimated sustainable yield of the aquifer in a drought year, indicating the dune sand aquifer would be able to sustain an increase in groundwater extraction to supply the reserve. The investigation also concluded "It is considered that the increased extraction should not result in long term drawdown of the water table, and is unlikely to induce saltwater intrusion."

Wastewater is treated in a plant located next to the newer of the two communal amenity buildings. Waste water is delivered to the treatment area via a series of collection wells and pumps. The treated water is then pumped to a series of retention and transpiration beds on the steep land to the west of the caravan park. Although the system is only a few years old it could be modified or replaced to achieve a higher level

of treatment which would in turn facilitate the capacity for some water re-use. Interim work has been undertaken to eliminate occasional odours which effect areas close to the plant.

While the caravan park is maintained to an appropriate standard some of the infrastructure and facilities are relatively dated in relation to the significance of the location and some are at the end of their practical and economic life.

3. STATUTORY FRAMEWORK

3.1 INTRODUCTION

This Plan of Management has been prepared in accordance with the Crown Lands Act 1989 to provide a framework for the future management of part of Reserve 53519 for Public Recreation and for the operation, use and appropriate improvement of the Seal Rocks Holiday Park. Other legislation including environmental planning policies as well as guidelines and strategies require consideration especially where any new development proposals are contemplated.

3.2 CROWN LANDS ACT 1989

The objectives 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 Draft 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.

Part V of the Act provides that a trust may be appointed to manage a Crown reserve. Some of the main provisions of Part V of the Act as they relate to a trust's on-going management are:

- With the Minister's consent, a Reserve Trust may sell, lease, license or grant an easement or license etc. over part or the whole of a reserve;
- The Act does not prescribe the length of leases or licenses of reserved land;
- The Minister may direct how the proceeds of sale, lease or license is applied;
- If a reserve trust is acting in good faith in its management of the affairs of the reserve trust the liability of its members is safeguarded; and
- The Minister responsible for the Crown Lands Act or the reserve trust (with the agreement of the Minister) may prepare a Plan of Management for the reserve.

The Crown Lands Act 1989 and existing policy for the management of Crown land encourages the appropriate commercial use of Reserved Crown land. Appropriate commercial activity can not only meet the needs of public users of a reserve but also generate the financial means required to manage and improve the Crown Reserve system generally. It should be noted that it is a specific requirement of the Act that the proceeds of commercial undertakings on reserved Crown land be spent on the management of reserved Crown land.

3.3 THE 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 a consent authority must consider when assessing a Development Application. 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.

This Act also 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. In recent times the Act has also been amended by the introduction of new provisions dealing with methods of assessment and consent authorities.

In some circumstances development works may be undertaken without the need for development consent under Part 4 of the Act. Where this occurs, a review of environmental factors (REF) under the provisions of Part 5 of the Act is generally prepared.

3.4 THE LOCAL GOVERNMENT ACT 1993

Section 68 of the LG 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 can impose conditions on

the operation and structure of a caravan park. The standards for caravan parks are defined in the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005. The standards address technical standards such as site types, setbacks, size and site coverage; road dimensions, 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.

The former Land and Property Management Authority have granted concurrence to Council for the issue of a Section 68 Approval to Operate for the Holiday Park with the following number and allocation of sites;

Sites	Number
Long term	1
Short term	76
Camp	56
Total	133

3.5 RURAL FIRES ACT 1997

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

Bushfire Prone Land mapping held by Great Lakes Council indicates that the north western corner of the Holiday Park is designated as fire prone land (including the buffer zone). Where this designation occurs and a proposed development is for a special fire protection purpose, a bushfire safety authority must be obtained from the Rural Fire Service before the application is determined. This is usually achieved by way of a report prepared by a bushfire specialist and usually accompanies a development application.

At present management actions in relation to the protection of the caravan park from the threat of the spread of fire are undertaken in accordance with the Draft Fire Mitigation Plan(17/11/2005) prepared by Great Lakes Council in consultation with the Rural Fire Service, National Parks and Wildlife Service and the former Department of Lands. The Plan provides for the maintenance of asset protection, exclusion and strategic management zones. See Appendix 5.

If development works are to be undertaken on the fire prone land portion of the Park and these works are to be undertaken as development without consent under the provisions of the Plan of Management, then a Part 5 review of environmental factors will be required to address the fire prone land considerations as well as the broader Fire Mitigation Plan for the entire Park.

3.6 THE RESIDENTIAL PARKS ACT 1998

This legislation was developed by the Government in an effort to ensure that the rights of permanents park residents and owners were clearly defined and that appropriate processes and procedures were established in this regard. The Act has greatest significance in caravan parks which are given over wholly to permanent residents or in parks with large numbers of residents. In 2006 the Act was reviewed, revised and amended. There is one approved long term site at Seal Rocks Holiday Park.

3.7 HOLIDAY PARKS (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 for owners of moveable dwellings in holiday parks in New South Wales. 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 (ie moveable dwelling) and sites.

Given the considerable number of holiday van owners in Seal Rocks Holiday Park this Act and its requirements has implications for the Holiday Park's ongoing operation.

3.8 RELEVANT ENVIRONMENTAL PLANNING POLICIES

3.8.1 Coastal Policy 1997 and State Environmental Planning Policy No 71.

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. (Coastal Policy, A sustainable future of the NSW Coast - Fact Sheet, 1997)

The Coastal Policy 1997 introduced three main changes to the previous Policy:

<u>A revised definition of the coastal zone.</u> The 1997 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 previous policy only applied to areas within one kilometre of the ocean.

<u>Introduction of an Environmental Philosophy</u>. The Policy is described as an integrative policy based on the principles of ecologically sustainable development (ESD) and

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

A policy hierarchy of goals, objectives and strategic actions. The current policy framework has the same mix of initiatives but with some change of emphasis. There is a greater emphasis on improving water quality and maintaining public access to the coastline.

The Coastal Policy proposes that a range of management planning approaches including catchment management plans be implemented in consultation with relevant agencies to ensure that 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.

The principles of ecologically sustainable development are now also included within the

Local Government Act. These principles may on first assessment appear to place limits on the commercial use of land, however, the principles contain provisions that encourage the proper pricing of the use of land and services as well as provisions for ongoing investment in and improvement of land to ensure sustainability.

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*. Finally, 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 general principles established in the SEPP should be recognized 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
- (l) 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.

Where development without consent is to be undertaken under the provisions of an adopted Plan of Management, the relevant matters listed in Clause 8 of the Policy would be reviewed by way of a Part 5 review of environmental factors.

3.8.2 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 Act should apply and to set out the functions of Regional Planning Panels in determining specified development applications.

The changes which occurred in 2011 relate to the removal of Part 3A from the EP&A Act and consequently the SEPP 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 what types of development constitute State Significant Development (SSD), State Significant Infrastructure (SSI) as well as Regional Development (in conjunction with Schedule 4A of the EP&A Act).

A review of the Policy highlights that for tourist caravan park development to be classified as State Significant Development the site has to be classified as a sensitive coastal location, the capital investment value (CIV) 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' as the sites can be utilised with or without the cabins.

It is also possible that the 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 development program proposed as part of this Plan of Management for the Seal Rocks Holiday Park does not fall within the various provisions of the State and Regional Development SEPP outlined above.

3.8.3 State Environmental Planning Policy - Infrastructure

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 $100m^2$.

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.

3.8.4 State Environmental Planning Policy No 26 - Littoral Rainforest

The aim of this Policy is the protection of littoral rainforest areas. The Policy maps these areas and requires additional types of approvals or steps in the approval process for development proposals within the rainforest areas or within 100m of the mapped rainforest areas.

A very small area at the rear of the Holiday Park and the lands to the south and east of the caravan park are mapped SEPP 26 Littoral Rainforest areas (within the National Park). The Policy requires NPWS concurrence with respect to development consents for any works proposed within 100m of the mapped lands. A considerable portion of the caravan park falls within the 100m zone and this is shown on the Plan of Management mapping. There are some improvements proposed by the Plan of Management where the Trust will be required to liaise and consult with the NPWS in terms of the relevant requirements of this SEPP.

3.8.5 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 movable 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 the SEPP 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. Council's 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 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 movable dwellings on land approved for use as a caravan park

3.9 GREAT LAKES LOCAL ENVIRONMENTAL PLANS

3.9.1 Great Lakes Local Environmental Plan 1996

The Great Lakes Local Environmental Plan 1996 (LEP) provides the primary planning framework for the assessment of development applications for works proposed on the land

to which this Plan of Management applies. The general aims of the LEP in relation to statutory land-use planning for Great Lakes are:

- (1) The aims of this plan are:
 - (a) to provide an updated and simplified plan for the area of Great Lakes, and
 - (b) to protect and enhance the environmental qualities of the area, and
 - (c) to facilitate the orderly and economic development of land within the area, and
 - (d) to promote the well-being of the area's population.
- (2) The objectives of this plan are:
 - (a) to provide a land use framework to guide the future use of the land within the area of Great Lakes, and
 - (b) to provide a basis for the preparation of detailed development control plans, and
 - (c) to protect environmentally sensitive areas and the heritage of the area, and
 - (d) to improve opportunities for ecologically sustainable development, and
 - (e) to provide for the cultural needs of and the equitable provision of services and facilities for the community

The Seal Rocks Holiday Park is zoned 7(b) Conservation. The provisions in the LEP with respect to this Zone are as follows;

"Zone No 7 (b) (Conservation Zone)

1 What are the objectives of the zone?

The objective of the zone is to enable a limited range of development (including tourist facilities) on land possessing special aesthetic or conservation values where:

- (a) it can be demonstrated that the development can be carried out in a manner that minimises risks from natural hazards, and
- (b) the development functions efficiently, and
- (c) the development does not prejudice other economic development, and
- (d) the development does not significantly detract from the scenic quality of the land within the zone, and
- (e) the development is unlikely to have a significant detrimental effect on the growth of native plant communities, and
- (f) the development is unlikely to affect the survival of native wildlife populations, and
- (g) the development is unlikely to adversely affect the provision or quality of habitats for either indigenous or migratory species.

2 What is permitted without development consent?

Nil.

3 What is permitted only with development consent?

Development for the purpose of:

advertisements; agriculture; bushfire hazard reduction; communication facilities; community facilities; dwelling-houses; environmental facilities; motels; recreation areas; roads; tourist facilities; utility installations.

4 What is prohibited?

Any development not included in Item 2 or 3."

The zoning table includes "tourist facilities" as a land-use that is permissible with the consent of Council. The definition of "tourist facility" includes caravan parks and camping areas.

A very small area at the rear of the Park is covered by a 7(a) Wetlands and Littoral Rainforest land use zone which predominantly applies to the lands to the south of the Holiday Park. Similarly lands to the east are also zoned 7(a). The lands to the south and to the east are mapped SEPP 26 Littoral Rainforest areas.

One implication of SEPP 26 is a requirement for NPWS involvement in development consents for any works proposed within 100m of the mapped lands. A considerable portion of the Park falls within the 100m zone.

3.9.1 Draft Great Lakes LEP 2012

Great Lakes Council has prepared a Draft LEP pursuant to the implementation of the State Government's intention to establish new Standard Local Environmental Plans. The Draft Plan is on public exhibition until 24th August 2012. In the Draft Plan the Seal Rocks Holiday Park is proposed to be principally within Zone E3 Environmental Management which allows "camping ground" and "caravan park" as land-uses that are permissible with the consent of Council. The objectives for the Environmental Management Zone aim to "protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values" and "provide for a limited range of development that does not have an adverse effect on those values."

A small portion of the Reserve on the southern boundary of the land is proposed to be Zone E2 Environmental Conservation. The objectives for the Environmental Conservation Zone are aim to "protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values" and "prevent development that could destroy, damage or otherwise have an adverse effect on those values".

A Draft Development Control Plan 2012 has also been prepared by Council and is being exhibited in conjunction with the Draft LEP. DCP 2012 includes what was formerly DCP 45 - Seal rocks Coastal Hamlet and has provisions with respect to the future development and character of the Seal Rocks village. While the Seal Rocks Holiday Park falls outside the area to which the DCP has specific application the "Structure Plan" for

the village provides that "Caravan parks are to continue as an important low scale and low cost resource for tourist accommodation outside of the Hamlet".

3.10 OTHER PLANNING REGULATIONS, CONTROLS AND STRATEGIES.

Great Lakes Council has a range of other planning controls, policies and guidelines in place. These take the form of development control plans (DCPs), development guides and the like. Depending upon proposed activities, works or development proposals that may emerge in the Reserve over time, it may be that these planning controls require consideration.

Government Departments and agencies also maintain policy and guideline material that may be relevant.

NSW Sea Level Rise Policy Statement 3.10.1

The NSW Government has in place 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. One of the recognised impacts from climate change is sea level rise, which is projected to rise along the NSW coast relative to the 1990 mean sea level by 40cm by 2050 and by 90cm by 2100.

It is recognised in the NSW Sea Level Rise Policy Statement¹ that increased sea levels will have significant impacts in the medium to long term. Accordingly, the NSW Government supports action by coastal communities to adapt to rising sea levels in a manner that minimises the resulting social disruption, economic costs and environmental impacts. This approach is described as an adaptive risked-based approach. Planning, investment and development decisions therefore need to consider sea level rise projections over time frames that are consistent with the intended time frames of the decision.

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 Park has a short to medium term design life and new development can be engineered to meet the Government's Guidelines for coastal development.

NSW Government, NSW Sea Level Rise Policy Statement, October 2009.

3.10.2 NSW Coastal Planning Guideline: Adapting to Sea Level Rise, August 2010

The NSW Coastal Planning Guideline: Adapting to Sea Level Rise has been prepared to provide guidance on how sea level rise is to be considered in land use planning and development assessment in coastal NSW. The guideline applies to all coastal areas of the state with the term 'coastal areas' used broadly to refer to all land fronting tidal waters including the coastline, beaches, coastal lakes, bays and estuaries and tidal sections of coastal rivers. It also includes other low lying land surrounding these areas that may be subject to coastal processes in the future as a consequence of sea level rise. The aim of the guideline is to promote ecologically sustainable development (ESD), and in particular to encourage a precautionary approach to land use planning and development assessment in light of potential sea level rise impacts in coastal areas.

The guideline adopts six coastal planning principles for sea level rise adaptation. The principles should be applied in decision-making processes for land use planning and development assessment in coastal areas.

<u>Principle 1</u> - Assess and evaluate coastal risks taking into account the NSW sea level rise planning benchmarks.

<u>Principle 2</u> - Advise the public of coastal risks to ensure that informed land use planning and development decision-making can occur.

<u>Principle 3</u> - Avoid intensifying land use in coastal risk areas through appropriate strategic and land use planning.

<u>Principle 4</u> - Consider options to reduce land use intensity in coastal risk areas where feasible.

<u>Principle 5</u> - Minimise the exposure of development to coastal risks.

<u>Principle 6</u> - Implement appropriate management responses and adaptation strategies, with consideration for the environmental, social and economic impacts of each option.

In August 2010 the government also published a Flood Risk Management Guide and a Coastal Risk Management Guide. These documents have been prepared to assist local councils, the development industry and consultants to incorporate sea level rise planning benchmarks in risk management planning and risk assessments for new development. The Guides are to be read and applied in conjunction with existing relevant, manuals and policies.

Alterations and additions to existing buildings, construction of new buildings, installation of moveable dwellings and other works proposed within the Holiday Park will address the relevant and applicable recommendations of the above documents. In addition the Reserve Trusts will be required to address emerging policy and regulatory provisions

related to the impacts of climate change and sea level rise.

3.10.3 Crown Lands Caravan Parks Policy

In 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 number of holiday (storage) vans and to improve the appearance and management of caravan parks. The Policy establishes policies, objectives and strategies that are relevant to the future management and development of all caravan parks on crown land in New South Wales.

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 shortterm 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.

In the Policy a distinction is drawn between **tourist parks** and **general parks**. Tourist parks cater primarily for tourists and as a general guide an upper limit in the Policy is that no more than 50% of short term and long-term sites may be used to accommodate a mix of long-term residents and holiday vans.

<u>General Parks</u> depend for their viability on meeting a demand for both short term and long term sites. Given the special character of general parks, most of which are located in in-land areas, the proportion of long term to short term sites is determined by

local conditions of demand.

The Seal Rocks Holiday Park has been classified as a tourist park under this Policy with the intent that the development of sites and facilities for tourism will continue to be the dominant use of the land. It is therefore important that the proportion of holiday vans in the Park are monitored and managed to ensure consistency with the Policy and to obtain the optimum outcome for the community.

3.11 OTHER STATUTORY AND POLICY DOCUMENTS

There are a number of other documents relevant to the ongoing management of the reserve that have been considered in the preparation of this Plan including;

- Native Vegetation Conservation Act 1999;
- NSW Estuary Management Policy;
- SEPP No.14 Coastal Wetlands; and
- Threatened Species Conservation Act 1995;
- Disability (Access to Premises Buildings) Standards 2010, Disability
 Discrimination Act 1992

3.12 SUMMARY

The management, operation and improvement of Reserve 53519 for Public Recreation and the Seal Rocks Holiday Park must take account of a range of statutory controls and policies. It is a fundamental requirement of this Plan of Management that the Reserve Trust Manager will comply with the requirements of applicable legislation, regulations, approvals and policies.

4. RESOURCES AND VALUES

4.1 RESOURCES

The principal resource with respect to this Plan of Management is the land and the Holiday Park located on Lot 506 in DP 1111033 and within Reserve 53519 for Public Recreation. The Holiday Park is clearly a long standing and valuable resource to the local area and the State as it provides 133 accommodation sites in an attractive setting in close proximity to a beach location. In addition the Park currently provides a range of services and infrastructure that support the operation.

4.2 VALUES

The Reserve and Seal Rocks Holiday Park have a range of significant values inherent in the natural and historic characteristics of the land and the immediately adjoining areas and the recreational opportunities provided by this context. The Seal Rocks area represents a sought after location on the mid north coast in proximity to facilities and services as well as the natural features of the Great Lakes district. The designation of the Myall Lakes system and the associated coastline as a Marine Park highlight the value ascribed to the area. These factors combine to create a resource of strong scenic, conservation and recreational value as outlined below.

Natural and Conservation Values

The Holiday Park forms part of a larger natural area located behind the beach. This wider area provides for natural drainage from the hinterland to the west as well as linkages of both open space areas and natural coastal vegetation to the north and south.

Recreation and Tourism Values

The Seal Rocks Holiday Park functions as a key provider of tourist accommodation and recreational facilities within the context of the Seal Rocks/Myall Lakes area. The Park provides a major focus for the recreation activities of tourists and local residents.

Social and Economic Values

The Holiday Park forms an important part of the community life of Seal Rocks and the wider Great Lakes area. The use of this natural setting for exercise, relaxation, holidays and social gatherings contributes to the identity and well being of the community.

The Park is a major local resource for tourism that makes a significant contribution to the local economy. The Park also has the capacity to make a significant financial contribution to the delivery of public infrastructure and services within the greater Regional Crown Reserve system. The Park's capacity to maintain or increase revenue and provide an appropriate return on investment is crucial to the ongoing maintenance and development of the Park and the Crown estate on this part of the coast.

5. MANAGEMENT OVERVIEW

5.1 INTRODUCTION.

This Plan of Management is based on a 'Vision Statement' which will guide the Reserve Trust in its decision making processes. It is then supported by management principles which in turn generate specific management objectives, actions and implementation plans. A number of the detailed concept and implementation plans are part of this Plan of Management. In some areas final outcomes will be subject to further detailed consideration. This will allow the Reserve Trust to be responsive to economic factors, new information and environmental, social and technological change.

5.2 VISION STATEMENT

The Vision of the Reserve Trust in managing Reserve 53519 and the Seal Rocks Holiday Park is:

To conserve and maintain the natural environment of the Reserve within its context and provide a range of recreation and accommodation opportunities for visitors and local residents while achieving appropriate environmental, land management and financial outcomes.

5.3 MANAGEMENT PRINCIPLES

The following principles establish the broad direction the Trust will follow in implementing strategies to achieve the Vision. These principles have been applied specifically to the actions stated for each management unit.

I. Natural Environment: To recognise, protect, and enhance the environmental

and ecological values of the Reserve within the context

of the adjoining lands.

2. Cultural Values: To recognise, interpret, and promote valuable cultural

heritage relating to the Reserve and local area including

the continuation of traditional holidaying activities.

3. Recreation: To provide for a range of recreational and holiday

activities based on the natural and cultural features of

the Reserve.

4. Holiday Park: To optimise income to the Reserve by providing a variety

of tourist accommodation options with an emphasis on affordable family holiday opportunities. In addition the accommodation and social needs of any existing Holiday Park long-term residents must be considered to ensure

those rights are respected.

5. Utility Services: To provide essential services such as reticulated water,

power, wastewater treatment and disposal and storm water drainage in an efficient and environmentally

sustainable manner.

6. Safety and Public Health: To provide and maintain facilities, in a manner that

minimises risk to Reserve users and promotes a healthy

lifestyle.

7. Reserve Information: To inform people effectively of the Reserve's attributes,

activities and facilities as well as appropriate ways to

use and care for them.

8. Integrated Coastal

Management:

To promote and assist integrated coastal land

management associated with Seal Rocks Holiday Park,

the surrounding National Park lands and the Marine

Park.

In the development, improvement and management of the Seal Rocks Holiday Park the Reserve Trust will adopt sustainability principles and recognise the need for;

- (a) conservation of energy and reduction in carbon dioxide emissions,
- (b) building materials and building processes that involve low embodied energy;
- (c) building design and orientation that uses passive solar design, day lighting and natural ventilation,
- (f) energy efficiency and conservation,
- (g) water conservation and water reuse,
- (h) waste minimisation and recycling,
- (i) the use of landscaping to provide shade, shelter and screening; and
- (j) potential for adaptive reuse of structures and materials.

5.4 MANAGEMENT ISSUES

The Holiday Park and adjoining lands have been inspected and assessed to develop an understanding of the matters that need to be addressed in the management strategies and actions that are detailed in this Plan of Management and implemented by the Trust. The following provides a summary of this analysis and highlights key issues.

Analysis of the Holiday Park has identified a number of strengths;

- Location a secluded and particularly attractive coastal location close to surf beaches and headlands, not far from protected waterways and adjoined by national park;
- Good access to beaches, waterways and national park areas. Boat launching ramps are located at Seal Rocks and at Smiths Lake and various walking tracks link directly to the surrounding national park system;

- Proximity to the large urban population centres of Sydney, Newcastle and the Hunter Region;
- While removed from local urban areas the Park is only half an hour by car from Forster/Tuncurry;
- The Park is 'off the beaten track' and dominated by its surrounding environment;
- Special nearby attractions include the coastal zone, whale watching, the Lighthouse and the national park;
- Existing infrastructure is appropriately maintained although a number of items are close to the end of their economic life;
- Existing self-contained accommodation achieves very good occupancy rates;
- There are excellent views and amenity from most parts of the Park; and
- One amenities building is of recent construction and in sound condition.

In contrast to those strengths there are a number of issues identified in the assessment of the Park that need to be addressed;

- The existing sewerage treatment system could be modified to achieve higher levels of wastewater treatment;
- The use of the Park for camping over many decades has completely removed the naturally occurring endemic native vegetation from the main areas of use;
- The existing roads do not adequately deal with storm water runoff;
- Greater attention to rainwater harvesting to reduce the use of water from the aquifer;
- There are no recreational facilities of any type within the Park. This
 includes games rooms and/or meeting halls, a shaded children's playground
 and active recreational facilities;
- Camp kitchen and communal meeting areas are limited or non-existent;
- On site accommodation does not take full advantage of the Park's outlook and setting;
- The supply and diversity of the cabin accommodation does not address the commercial potential of the location;
- Cabins that are arguably in the best location are not self-contained;
- There are no designated en-suite sites;
- The need to manage and control the location and proportion of holiday vans and address any non-compliance issues;
- Aspects of the older amenities block, laundry and associated spaces are in poor condition and are not integrated with other elements of the Park;
- The location of the entry, office/residence and maintenance shed represents a poor use of high quality land within the Park. In particular a large proportion of this area is given over to hard surface and car parking;

- The reception area and office is small relative to the requirements of the Park and the manager's residence is in poor condition;
- The existing site layout and road pattern is tight and cramped in places and there are too many roads; and
- The need to ensure that all aspects of the Holiday Park operation embrace ESD principles to the extent this is possible.

5.5 VEGETATION MANAGEMENT

As stated in Section 2.2 the Seal Rocks Holiday Park adjoins the Myall Lakes National Park. Vegetation in this part of the National Park includes an area of 20 hectares of littoral rainforest found to the south of the caravan park which was listed in the Register of the National Estate in June 1997. The Statement of Significance in relation to this natural vegetation community is as follows;

"This plant community type is now rare in New South Wales. The Seal Rocks littoral rainforest contains a relatively high diversity of native plant species with sixty four tree and shrub species and twenty three species of climber. A further indication of this diversity is that these species represent over fifty different plant families. The association of species found in the rainforest is unusual and is not found anywhere else in the mid north coast region of New South Wales. Four rainforest plant species are at their most southerly geographic limit of distribution at Seal Rocks, while a further six rainforest plant species are nearing their southernmost geographic limit of distribution.

The littoral rainforest at Seal Rocks is readily accessible and demonstrates well dynamic vegetation processes. For these reasons the place has value as an education site."

In terms of the integrity and condition of the vegetation the listing states the following;

"Generally the littoral rainforest patches are in a fair condition. About 5ha of the rainforest adjacent to the caravan park has been subject to severe dieback as a result of fire, and exposure to salt laden winds, and severe infestation with lantana in exposed areas and around the edges. The lantana does however appear to be providing some protection from wind on these exposed edges, thus preventing further dieback. Most of the rest of the forest patches have intact canopy and abundant seedling regeneration, although the main road to Seal Rocks village bisects the area. There is also a large clearing on the cliff top at the northern edge of the forest. There is also an abandoned quarry site on the seaward side of the eastern rainforest stand. (1996)"

Historically it is likely littoral rainforest was present within the caravan park boundaries,

however, the impact of camping over many years has seen the progressive removal of vegetation to accommodate caravans and campers. The only vegetation in the main area occupied by the caravan park consists of introduced grasses and landscape plantings undertaken over the past 5 to 10 years. Some of the landscape plantings have included endemic plant material. As well as the infestation of lantana referenced above there is identified invasion of *Chrysanthemoides monilifera*(Bitou bush). The future management of vegetation within the Holiday Park will be structured to contribute to the protection and preservation of this significant vegetation community by:

- Co-operating with the National Parks and Wildlife Service (NPWS) to limit the spread of invasive species in the areas of littoral rainforest that adjoin the southern boundary of the caravan park;
- Supporting co-operative weed control programs with NPWS and Great lakes Council, contractors and volunteers;
- Implementing measures to control the spread of invasive species in the vegetation communities on the steep land in the western part of the Reserve;
- Where appropriate eradicating invasive species from the vegetation communities on the steep land within the western part of the Reserve;
- Using native species with local provenance in plantings in accordance with landscaping and vegetation management strategy prepared by a suitably qualified person - (already new plantings in the park utilise plant material grown from seeds collected in the locality by Great Lakes Council's Bush Regeneration Officer); and
- Educating guests in the caravan park in relation to the significance of the flora and fauna to ensure the ongoing use of the Park does not have further adverse impacts on the health of the adjoining vegetation communities.

Appendix 5 contains an extract from the Register of the National Estate which provides details in relation to the Seal Rocks Littoral Rainforest, Seal Rocks Rd, Seal Rocks, NSW, Australia -

5.6 BUSHFIRE PLANNING AND PROTECTION

The Trust will have an ongoing co-operative involvement with the NPWS and the Rural Fire Service(RFS) in reviewing and finalising the Draft Fire Mitigation Plan which forms part of the wider Seal Rocks Village Protection Plan. As an integral part of this planning process the Reserve Trust will provide access to fast filling facilities for the fire fighting appliances of the RFS and NPWS. These facilities will become available as a result of the construction of a large capacity water tank by the Reserve Trust which will assist in resolving the lack of water sources for this purpose in the area(refer to Section 5.8 below).

5.7 PROPOSED IMPROVEMENTS - Drawing SR - 03A

Inspection and analysis of the Seal Rocks Holiday Park has resulted in identification of a range of desirable improvements, facilities and accommodation products which are required if the Holiday Park is to address its land management responsibilities and achieve appropriate financial potential. Proposed improvements need to be assessed against their potential to enhance future financial and land management outcomes for the Reserve and its contribution to the community and the management of reserved Crown land. In formulating a practical development and improvement program, a number of factors have been considered including;

- Potential to improve the day-to-day management of the Holiday Park and the interface with public access to and enjoyment of the adjoining reserved land;
- · Potential to achieve environmental objectives;
- Safety, security and regulatory compliance;
- The principles and parameters established in relevant legislation and policies of the New South Wales government;
- Potential to generate income and profit that can be reinvested into the appropriate sustainable management of the Reserve;
- Potential to improve visitor amenity; and
- Cost and contribution to the local economy.

Given budgetary constraints and operational considerations any program will, of necessity, take a number of stages to implement. In terms of the future financial performance of the Seal Rocks Holiday Park the proposed improvement program has been formulated with three principal aims;

- To achieve an appropriate balance between responsible land management and achieving appropriate profit outcomes from a business enterprise on public land;
- To enable Seal Rocks Holiday Park to capture a fair share of the existing overnight tourist visitation to the region at tariff levels appropriate to the quality of the location; and
- To provide Seal Rocks with the opportunity to continue to focus on providing opportunities for the community to enjoy an affordable traditional camping or caravanning holiday and attract new visitation from recognised growth areas in the caravan park and tourist accommodation marketplace.

The proposed improvement program for the Park 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. There will be a reduction in the total

number of approved sites in the Park as a consequence of the new layout and site areas being in compliance with the regulations and to allow for development of improved facilities and appropriate environmental management.

The structure of the program is designed to bring improvements on-stream in a way that will address the most critical issues as early as early as possible while progressively enhancing the standard and quality of the park. Works will be largely undertaken within the context of an operating business environment and will be programmed for the period from April to November 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.

The proposed improvements are identified in the following table and described in the Drawings which form part of this Plan of Management and are included at Appendix 6.

Item	Stage 1	Stage 2	Stage 3	Stage 4
Road Alterations				
General Landscaping				
Wastewater treatment system				
En-suite sites (1 unit)				
Storm water management				
New Residence and Office				
Utility Service Upgrades				
Guest Lounge				
New Work Shed				
Safari tents				
Eco Cabins				
Playground				
Camp kitchen				
Amenities Renovation				
Outdoor Activity Zone				
Barbecue Shelters(3)				

5.8 DESCRIPTION OF THE PROPOSED IMPROVEMENTS

The proposed improvements and actions are indentified and described in terms of four future Management Precincts which are identified on Drawing SR-03A. The identified improvements, works and activities are authorised pursuant to Clause 65(2) of SEPP Infrastructure 2007.

Entry Precinct

The existing entry point from Seal Rocks Road will be retained but the configuration of the entrance forecourt and parking area will be significantly altered. These new arrangements will make land in the northern part of the Park available for cabin/safari tent accommodation and guest facilities. A new manager's residence and office will be located in a position that provides for more efficient check-in and check-out of guests as well as improved supervision and security. The new relocatable dwelling will provide manager's accommodation and incorporate a reception area and office designed to address the future operational requirements of the Park. The entry forecourt and arrival and departure lay-bys will be designed to comply with the requirements of the Regulations. A new maintenance and storage compound will be established close to the manager's residence with separate external access to minimise service vehicle entry into the Park. Authorised activities and works are detailed in Section 6.9.

Northern Accommodation Precinct

The relocation of the existing parking area and roads will enable cabin and safari tent accommodation to be installed in a position that takes advantage of the unique character and outlook the Park provides. At least one of these cabins will be an accessible unit designed to conform to the requirements of the Disability (Access to Premises - Buildings) Standards 2010, Disability Discrimination Act 1992. A guest lounge will also be sited in this area. The building will provide a space where every person who stays in the Park can relax and enjoy the ocean outlook. This will occupy the site of the current manager's residence and reception. The safari tents, cabins and the guest lounge will be designed to complement the character of the land and its environment.

A 10 to 15 metre wide landscaped vegetated buffer will be established between the Reserve boundary with the road and the proposed positions of the safari tents, cabins and the guest lounge - at present this area is occupied by some cabins, hard surface road and parking areas and the manager's residence, office and storage space. Plant material with local provenance will be selected.

The recreational facilities and amenities in the Precinct will be improved and expanded. The relocation of the existing maintenance shed will make space available for the development of an outdoor activity zone. The existing laundry will be demolished and the adjacent amenities block extended to provide laundry facilities and more appropriate housing for equipment which is essential to the efficient operation of the Park water supply. Authorised activities and works are detailed in section 6.9.

Central Short Term Precinct

This precinct currently contains short term sites and campsites which are serviced by a central amenities building. The road network will be re-configured to enable changes to the configuration of existing approved sites. En- suite units will be installed to service four sites. A camp kitchen and a children's playground will be installed adjacent to the existing central amenity building. Owners of holiday vans will be required to remove or relocate their vans in accordance with the directions of the Trust. The Trust will ensure that sufficient notice (90 days) is given to allow van owners to remove or relocate their vans. The suitability of the existing waste water system has been assessed and modifications or replacement will be undertaken as necessary. Authorised activities and works are detailed in section 6.9.

Southern Short Term Precinct

This precinct currently contains short term sites and campsites. Some roads will be removed and the land rehabilitated to enable changes to the configuration of existing approved sites. Power and sullage will be provided to 16 existing approved sites in the Precinct. These sites will become available for the installation of holiday vans in accordance with the relevant requirements of the regulations. Works will be undertaken to manage storm water movement through the precinct in a manner that adequately addresses relevant environmental issues and constraints. Owners of holiday vans will be required to remove or relocate their vans in accordance with the directions of the Trust. The Trust will ensure that sufficient notice (90 days) is given to allow van owners to remove or relocate their vans. A communal bbq facility will be installed for general use. This Precinct has over 250 metres of common boundary with the National Park and therefore fencing, vegetation management and fire control measures require ongoing attention based on a co-operative relationship with the NWPS. Authorised activities and works are detailed in section 6.9.

General Improvements including Western Precinct

The following general infrastructure and management improvements are proposed for the Park as a whole:

- Amplification and improvement to utility services to the Park including water, sewer, gas, storm-water drainage and electricity.
- The adequacy of the existing waste water treatment system has been assessed and there will be a requirement to significantly upgrade or replace this infrastructure to achieve a better outcome with respect to the protection of the

environment and the comfort of guests.

While the existing water storage and treatment system for the Park delivers a
consistent potable water supply it is heavily dependent on raw water drawn from
the aquifer. Reticulation of the treated water is via a system of pumps. During
dry periods the storage capacity does not provide an adequate level of reserve
and pressures are such that the fire fighting capacity of the system is limited.

It is proposed to construct a new storage facility on the high land to the west of the main area of the Park. This will involve underground boring to accommodate pipes to connect the storage tanks to the Park and reticulate power to control mechanisms and pumps. The Park's water storage capacity will be increased from 95,000 litres to 220,000 litres.

At the same time roof water harvesting will be increased which will in turn reduce the amount of water drawn from the aquifer. The new storage location will enable reticulation of water by gravity within the Park and eliminate some pumps and storage tanks. The service will be designed to meet the long term requirements of the Holiday Park. A "fast fill" facility will also be provided at an accessible location within the Holiday Park to facilitate the filling of fire fighting appliances in the event of any outbreak of fire. Access to the "fast fill" facility will be available to the RFS and the NPWS.

While the site for the construction of the new storage facility is within Reserve 53519 part of the access to the site is via an existing track from Seal Rocks Road and through part of Myall Lakes National Park. The parameters for use of the access track for construction and future maintenance of the storage facility will be negotiated with the NPWS Great lakes Area Office to ensure all relevant measures required to protect the environment are addressed.

This improvement will provide a more effective fire fighting capacity for the Holiday Park, the RFS and the NPWS. The location of the storage tanks will also establish a source of water that can be used by the NPWS in the event of threat of fire in the adjoining National Park. Refer to Drawing SR - 04 for the proposed position of the storage tanks.

Authorised activities and works within the Reserve are: demolition; erosion control; fencing; internal road works; construction of water storage tanks and associated service connections; installation and amplification of infrastructure and utility services.

Boundary fencing - in co-operation with the NPWS Great Lakes Area Office
appropriate fencing will be erected to establish a clear delineation of the
boundaries between the Holiday Park and Myall Lakes National Park. The design
of the fence will give specific consideration to preventing any encroachment into
the National Park and controlling wind blown litter.

The allocation of sites at the completion of the improvement program will be as follows;

Long Term	Short Term			Total		
	Drive in Tourist	Cabins	Safari Tents	En-suite	Holiday vans	
1	84	12	6	4	up to 16	123

5.9 SUSTAINABLE USE OF RESOURCES

Environmental sustainability initiatives include vegetation management, water quality controls and energy efficiency. There are also opportunities for improved storage and recycling of wastes, including green waste. In many cases environmental objectives can be achieved through design features of the roads, cabins and buildings generally.

Several elements are already in place within the Park in this regard. To achieve an improved level of environmental management and ecological sustainability it is intended that the following issues be considered in relation to all aspects of the improvement of the caravan park;

- use of low ecological impact materials;
- · use of renewable materials; and
- use of low embodied energy materials;

In addition a responsible approach to business management demands that attention is given to minimising operational energy and water requirements, recycling and the collection and re-use of storm-water. Over time rainwater tanks will be installed to harvest roof-water on existing cabins and buildings for use in landscaping and toilet flushing. More energy efficient heating systems will also be installed.

5.10 ASSESSING PROPOSED IMPROVEMENTS

It will be noted that this Plan of Management proposes a number of development projects will 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 provisions of relevant planning instruments including the Great Lakes Local Environmental Plan 1996;
- The compatibility of the proposal with the notified purpose of the Reserve;
- The impact on the existing use of the Reserve;
- Liaison with the NPWS Great Lakes Area Office to ensure any matters associated with the management and protection of the adjoining National Park are addressed;
- The compatibility with the Vision Statement and Management Principles for the Reserve;
- The need for the proposal. Whether 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;
- The benefit the development would bring to the normal Reserve user; and
- The Management responsibility and public availability of the development to Reserve users.

5.11 FINANCING IMPROVEMENTS

The Seal Rocks Holiday Park primarily generates income from the rental of tourist sites for holiday accommodation. Under current administrative arrangements information on the income and expenditure of the Park (which is information of a commercial nature) is provided annually to the Catchment and Lands Division of the Department of Primary Industries. The Holiday Park has the potential to trade profitably and will each year contribute a levy equal to 5% of Gross Revenue to the Public Reserves Management Fund(PRMF).

Funding for new initiatives can therefore be obtained 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 applications for grant funding to undertake environmental works and to contribute towards the cost of public facilities.

6. MANAGEMENT ACTIONS

The following tables detail the Management Objectives and Management Actions to be implemented by the Reserve Trust. In the first instance the Objectives and Actions are designed to achieve the Vision for the Reserve and address the Management Principles outlined in Section 5.3. The implementation of the identified Actions will address the Management Issues identified in Section 5.4. Where Actions involve physical improvements to the Reserve and reserve facilities those actions will be in accordance with the program in Section 5.7 and 5.8 and the plans and drawings that form part of this Plan of Management. Where further documentation is required the planning and design process will be guided by and comply with the Vision, Principles and Objectives established by this Plan.

6.1 NATURAL ENVIRONMENT

6.1.1 Vegetation and Habitat Management

Objectives	Actions
To minimise disturbance	Commission the preparation of a comprehensive Vegetation
to native vegetation.	Management Plan prepared by a suitably qualified professional;
	Commission the preparation of a comprehensive Landscaping
	Strategy and Planting Program prepared by a suitably qualified professional;
	Establish ongoing liaison and co-operation with NPWS to ensure
	appropriate management of vegetation and drainage on common boundary areas;
	Implement practices and procedures consistent with the Reserve
	Trust's environmental management planning strategies and policies;
	Use appropriate siting of recreation facilities, pathways and roads
	and cabins to preserve and protect existing native vegetation;
	 Manage pedestrian and vehicle access to and through the entire Park;
	 Update the Draft Fire Management Plan in co-operation with the RFS and NPWS;
	 Address any unauthorised damage to vegetation and garden refuse dumping;
	Implement public education programs where applicable;
	Define Park edge treatments and protect vegetation through the use of mulching, edge planting and/or fencing as appropriate;
	 Implement appropriate management strategies to preserve and
	protect any areas identified as valued habitat.

Implement and continue weed control, planting and natural regeneration programs;
 Actively manage vegetation adjoining boundaries or dwelling sites including any viewing locations and other high use locations;
 Restore appropriate natural vegetation as resources allow;
 Co-operate with other authorities in relation to the control of invasive species which could potentially have an adverse impact on the health of vegetation communities and natural habitat.

6.1.2 Coastal Processes

6.1.3 Catchment Management

Objectives	Actions
To implement effective catchment management within the Park and minimise impacts on coastal water quality.	 Review the existing stormwater management regime with a view to identifying problem areas, current difficulties or unsatisfactory practices. Liaise with NPWS and promote catchment management principles; Implement appropriate measures including erosion control, litter and silt traps and wetland filters where required to control stormwater; Use chemicals only in accordance with relevant guidelines and Australian Standards.

6.1.4 Visual Amenity

Objectives	Actions
Protect and enhance the	Select materials and designs for buildings, furnishings, signs and
visual amenity of the	pathways which are compatible with the natural environment,
Holiday Park and adjoining	create a unified theme for the Park and reinforce local character
reserved lands.	and design themes;
	• Locate facilities, accessways and signs to minimise impact on visual amenity while being clearly visible.

6.1.5 Fire Planning and Management

6.1.6 Ecological Sustainable Management

Objetives	Actions
To create a Holiday Park that achieves a high standard in terms of environmental responsibility.	 Design for minimisation of waste, optimum levels of recycling, a high degree of energy efficiency and responsible use of resources; Progressively upgrade the existing wastewater treatment system to enable a greater level of water re-use. Use low ecological impact materials; Use renewable materials; Use low embodied energy materials; Minimise operational energy requirements; Minimise required maintenance.

6.2 CULTURAL VALUES

6.2.1 Aboriginal and European Cultural Values

Objectives	Actions
To protect and enhance	Identify and protect any significant sites;
Aboriginal cultural values	Ensure access to significant sites for Aboriginal use;
in the Park	 Provide interpretation of significant sites where desirable and appropriate; As necessary implement strategies through on-going consultation with Aboriginal groups and the NPWS.

To protect and enhance	Identify and protect any significant sites;
European cultural values and heritage sites in the Park	Provide appropriate interpretation of significant sites where desirable.

6.3 RECREATION

6.3.1 Recreation Facilities

Objectives	Actions
Objectives To provide, maintain and upgrade designated recreation areas to cater for a range of recreation activities for Park guests.	 Actions Improve the Holiday Park and develop recreational facilities in accordance with Drawing SR-03A; Improve the range of facilities offered to guests so that the Park can function as a holiday destination facility. These recreation areas may provide over time: picnic tables, shelters and electric BBQs; community rooms that can accommodate gatherings; playgrounds, garbage bins and lighting; shade tree planting (use local native species); off street parking, including boat parking if possible/necessary; fencing to protect natural vegetation;
	 directional and interpretive signs; Construct and maintain facilities in accordance with relevant controls and construction standards.
To ensure easy access to recreation facilities within the Park.	 Based on Drawing SR-03A ensure an appropriate road and pathway layout to allow efficient movement within and through the Park; Provide places where people can relax and enjoy the ambience of the Park; Ensure appropriate access and parking for emergency vehicles.

6.3.2 Litter and Cleaning

Objectives	Actions
To reduce the incidence of	As part of ESD management (Item 6.1.6) review existing
litter and improve	arrangements for litter bins. Install and maintain litter bins in
recreational amenity.	convenient locations. Monitor bin use and modify servicing and bin
	provision as required. Encourage the community to provide
	information on litter collection requirements to assist the Trust and
	Council;
	Include litter reduction in public education programs.

6.3.3 Pedestrian access

Actions **Objectives** To develop, maintain and • In conjunction with the improvements indicated on Drawing SRrationalise pedestrian 03A, review existing linkages and circulation throughout the Park access to best suit current taking into account: use and conditions and to - level of use ensure access, safety, - vegetation useability and protection - erosion of the natural environment - visibility and convenience - desire lines; • Ensure access routes have appropriate proportions are appropriately aligned, well defined, safe and properly drained while using appropriate finishes and materials; • Ensure disabled access is provided to community facilities and bathrooms consistent with the Australian Standards requirements.

6.4 ACCOMMODATION

Objectives	Actions
To preserve and enhance the financial contribution the Holiday Park makes to the management of the wider reserve and the local community;	character of the coastal setting and capable of generating a consistent income stream to finance the ongoing management of the Holiday Park and make a substantial contribution to the management of the reserved lands.
To recognise the rights of holiday van owners and long term residents where they occur but also aim to reduce the proportion of Holiday Vans within the park consistent with government and Trust policy to ensure the ample provision of tourist accommodation and equity of access to public reserve lands.	 Ensure resident's rights under existing tenancy agreements are protected; Ensure that all holiday van owners are aware of their rights and responsibilities as well as the rights and responsibilities of park management (as defined in the Holiday Parks Long term Casual Occupation Act 2002); Address any existing non-compliance issues especially related to setbacks between holiday vans consistent with the requirements of the caravan park Regulations; Review the natural attributes of the park and current park layout in conjunction with demands for tourist accommodation and efficient business operations. In the light of this, undertake an improvement program that re-arranges the park layout where possible to enable the installation of additional tourist accommodation.

To create a holiday destination that takes advantage of the Park's location but preserves its existing character, sense of place and that provides affordable, value for money holiday opportunities for a wide cross section of the community

- Replace, relocate and improve existing cabins to provide affordable family holiday accommodation;
- Provide cabin accommodation for people with disabilities;
- Where necessary demolish poorly sited and unserviceable existing buildings so as prime locations are available for tourist accommodation and to enhance guest's appreciation of the natural setting of the Park;
- Install quality cabin accommodation on sites that take better advantage of the park's setting;
- Provide well organised drive on sites;
- Rationalise and rearrange the provision of useable camp sites.

To have a staged development process that is achievable in terms of planning and financial constraints.

 Aim to undertake an improvement program over 5 years based on the internal capacity of the Holiday Park to support the funding of the works.

6.5 UTILITY SERVICES

Objectives	Actions
To enable the maintenance and installation of utilities and services within the Park.	 Investigate options for the upgrade of the existing waste water treatment and disposal system; Upgrade the existing water supply and reticulation system to reduce reliance on extraction of water from the aquifer and to establish a more effective fire fighting capability for the Park; Investigate improved arrangements for reticulation of gas with a view to establishing a more efficient supply; Investigate installation of solar power generation and solar water heating to reduce electricity costs and to reduce the carbon footprint of the Park; Take care in maintenance activities to avoid disturbance to natural areas; Avoid location of new services in or through natural areas; Install new or revised services for planned accommodation upgrading and recreational facilities in accordance with an approved installation and rehabilitation strategy; Where the provision of any public utilities are required ensure appropriate ongoing management and access regimes.
	 Avoid location of new services in or through natural areas; Install new or revised services for planned accommodation upgrading and recreational facilities in accordance with an approved installation and rehabilitation strategy; Where the provision of any public utilities are required ensure

6.6 PUBLIC SAFETY

6.6.1 Safety and Risk Management

Objectives	Actions
To provide health, safety and risk management for the general public, guests and those involved in maintenance and management activities.	 Ensure all appropriate WH&S procedures and practices including relevant staff training are in place; Carry out regular risk management inspections for all infrastructure including accessways, fencing especially boundary fencing, community amenities buildings, other structures and furnishings and implement maintenance and repairs as required; Maintain recreational areas and playgrounds in accordance with relevant guidelines (Council, Australian Standards etc). Carry out tree and vegetation maintenance to remove hazards or obstructions; Review usage patterns and trends regarding 'novelty' and/or unregistered vehicles (motor bikes, push bikes, motorized scooters) and adopt appropriate management responses.

6.6.2 Regulation of Activities

Objectives	Actions
To improve security	Implement public education programs;
within the Park and	Exercise powers under Crown Lands Act, Crown (General Reserves)
discourage inappropriate	By-law and Local Government Act;
behaviour and activities	Select and install vandal resistant materials and designs when
and reduce the incidence	developing facilities;
of vandalism of facilities	Determine and implement suitable measures to address problems
or vegetation.	specific to particular areas eg:
	- alcohol restrictions;
	- lighting;
	- hours of use (picnic areas, facilities);
	- location & design of facilities & landscaping (improve visibility);
	 Modify activities which are prohibited or permissible;
	• Ensure prohibited activities are adequately signposted (see 6.7);
	Respond promptly to incidences of damage. Determine
	appropriate action for each case eg. prosecution, restoration
	agreement, restoration and protection of the area, publicity and
	education. Maintain a record of incidents and action taken;
	Restore and protect damaged vegetation areas to meet reserve
	management requirements;
	Implement CCTV surveillance and appropriate lighting at strategic
	Park locations and especially in the vicinity of boundary gates.

6.7 PARK INFORMATION

Objectives	Actions
To provide signs which	Design signs in accordance with State Wide Best Practice Guidelines
identify prohibited	to convey appropriate information for each site (eg. Prohibited
activities, safety	activities, advisory information, contact numbers for reporting
warnings and Park/	problems);
reserve information.	Minimise number of signs used by combining information.

6.8 INTEGRATED MANAGEMENT

6.8.1 Co-operation, Liaison and Co-ordination

Objectives	Actions
To implement the Plan of	Refer inquiries and liaise and co-ordinate as required with relevant
Management and address	government agencies, including:
relevant statutory	Catchments and Lands Division: Plan of Management adoption and
requirements in an	revisions, Crown lands leases, funding grants, etc.
ongoing, co operative	Department of Environment and Climate Change: Soil erosion and
and timely manner	acid sulfate soils, water quality, climate change.
within the available	<u>Department of Planning:</u> Approvals for proposals covered by Part 3A
resources.	of the EP&A Act.
	<u>RFS and Council Fire Control Officer</u> : Fire Control Management Plans and requirements.
	NPWS: Matters relating to the adjoining National Park lands
	including issues related to the provisions of SEPP 26.
	Great Lakes Council: required consents or approvals, environmental
	management initiatives, public reserves management, etc
	, , , , , , , , , , , , , , , , , , ,
To maintain a mutually beneficial relationship with the NPWS with respect to the interface between the management and improvement of the Holiday Park and Myall Lakes National Park.	 Refer proposals in relation to improvements within the 100 metre buffer zone of the SEPPP 26 Littoral Rainforest to the NPWS Great Lakes Area Office in accordance with regulatory requirements for notification and comments. Co-operate with the NPWS with respect to weed and pest control programs and access for local community fire management programs particularly on common boundary areas. Liaise with NPWS in relation to stormwater drainage and management to minimise and control impacts on the adjoining National Park. Co-operate with NPWS to close and rehabilitate any unauthorised tracks from the Holiday Park into the National Park; Establish ongoing co-operation with the NPWS Great Lakes Area Office with respect to public education programs, mutually beneficial web links for access to information and sale of entry and access passes.

6.8.2 Commercial Activities

Objectives	Actions
To allow for commercial	Approve commercial activities that are compatible with the use
activities that enhance	of the Park. Conditions of approval are to apply for insurance,
recreational opportunity	lease or permit fees, minimising noise and other impacts on
without impacting	users, environment or visual amenity as appropriate;
adversely on other	Fee structures will reflect the level of community benefit from
recreational users, the	the activity.
natural environment or	
visual amenity of the	
Reserve.	

6.8.3 Adjoining Development

Objectives	Actions
To minimise impacts on the	Consent requirements for developments adjoining and likely to
Reserve from adjoining	impact on the Park are to include appropriate conditions to
development	minimise the impact on the amenity of the Reserve, protect its
	resources and values and to ensure the integration of land uses
	where appropriate.

6.8.4 Funding

Objectives	Actions
Objectives To maximise funding opportunities to enable implementation of the Plan of Management	 Implement the improvements proposed for the Park through funding from trading profits; Ensure up to date information is available on relevant funding programs; Apply for funding for suitable projects; Co-ordinate and maximise funding opportunities eg. matching
	Trust funding with government funding and by obtaining funding for community group projects.

6.8.5 Project Planning and Implementation of Other Plans

Objectives	Actions
To complete site	Prepare any required plans for upgrading recreation facilities and
assessment, planning and	accommodation areas;
design to assist in works programs and sourcing of	 Prepare vegetation regeneration plans for priority areas where required;
funds	 Carry out environmental and user needs assessments at site planning and design stage as required for all improvement works; Liaise with stakeholders to ensure all issues are addressed through the site assessment project planning process.

6.8.6 Leases and Licenses

Objectives	Actions
To enable leases and	The Trust may enter into a lease or license for whole or part of
licenses for appropriate	the lands to which this Plan applies provided that:
uses.	- Management of the land is in accordance with this Plan of
	Management and relevant government policies and guidelines;
	- The use of the land is in the public interest;
	- The granting of the lease, license or estate is in accordance with
	the relevant provisions of the Crown Lands Act 1989.

6.9 AUTHORISED ACTIVITIES AND WORKS

Management Precinct	Authorised Activities and Improvements
Entry Precinct	Provision of a new manager's residence, park office and reception area; road works; installation of boom gates; construction of visitor parking spaces; storm water drainage; underground utility service installation; construction of buildings to accommodate park management equipment and materials; fencing, vegetation management; and landscaping.
Northern Accommodation Precinct - 18 short-term dwelling sites.	Demolition; road works including new road construction and realignment of existing road; reconfiguration of site layout and site boundaries; storm water drainage; underground utility service installation; installation of relocatable homes(cabins/safari tents) in accordance with the caravan park regulations; refurbishment of amenities building; fencing; paving; landscaping; vegetation management; construction of barbecue shelters, guest lounge, viewing platform and playground.
Central Short Term Precinct - 34 short term dwelling sites	Demolition; road works; storm water drainage; underground utility service installation; construction of a camp kitchen and playground; construction of en-suite facilities; construction of a barbecue shelter; alterations, additions and renovations to the existing central amenities including provision of facilities for people with a disability; waste water treatment system works; fencing; landscaping; and vegetation management.
Southern Short Term Precinct - 71 short term	Road works including new road construction and realignment of existing road; stormwater drainage;

dwelling sites and one	reconfiguration of site layout and site boundaries;
long term dwelling site	underground service installation; installation of relocatable
	homes in accordance with the caravan park regulations;; construction of bbq shelter; vegetation management; and landscaping.
General	Demolition; Erosion control; Fencing; Internal road works; Construction of water storage tanks and associated service connections; Installation and amplification of infrastructure and utility services; Underground utility service installation; Fencing; Vegetation Management: Weed and pest control; Ongoing maintenance of service infrastructure; and Storm water drainage works;

6.10 HOLIDAY VANS

Holiday vans are those owned by individuals and families which, under agreement, are able to 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.

This Plan of Management provides for a reduction in the number of holiday vans to 16 located along the south eastern boundary of the Holiday Park. A ballot system will be used to determine which current Holiday Van owners will be allocated a site. This ballot will be performed after the adoption of the Plan of Management. Once a site is allocated by ballot, it cannot be assigned to another person(s).

To enable the improvement works authorised by this Plan of Management to be undertaken all holiday van owners will be given 90 days notice to vacate their site in accordance with the Holiday Parks (Long Term Casual Occupation) Act 2002. The notices will be issued to ensure current van owners do not have to remove their dwellings prior to the end of April 2013.

Holiday van owners who are then allocated a site under the ballot will be invited to return to the park after the completion of stage one of the improvement program. The installation of Holiday Vans will be subject to the relevant requirements of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005 and any rules and policies of the Reserve Trust and the Catchments and Lands Division of the Department of Primary Industries. .

7. IMPLEMENTATION AND REVIEW

This Plan provides a long term strategy for the management of the Reserve 53519 and the Seal Rocks Holiday Park. It is anticipated that the majority of the works described will be implemented over a ten year period with a number of matters addressed in the first five years. Priorities for works and funding are to be addressed on an annual basis to meet 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 Catchment and Lands Division of the Department of Primary Industries.

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

APPENDIX 1

Summary of the Issues Raised in Submissions Received in Response to Public Exhibition of the Draft Plan of Management

Issue	No. of submissions	Response
The Process		
There has been no community engagement in the preparation of the plan.	29	The exhibition period for the Draft Plan of Management complied with legislative requirements and was extended to allow additional time for community feedback. In addition a meeting was held with holiday van owners and the Save Seal rocks Committee in Nov 2011. An information session was convened with stakeholder groups in March 2012 and further opportunity given for comment and input.
The Documents		
There is a lack of detail in the plans to assess proposals adequately.	7	Plans have been amended where appropriate and the feasibility of the proposals verified on the ground and with reference to detailed topographic survey data. Additional detail has been incorporated where necessary to explain proposals.
No environmental studies have been undertaken to allow works to proceed.	8	Environmental assessment will be undertaken as required - all proposals contained in the Plan of Management will be subject to the applicable planning and environmental controls and any relevant requirements will be met prior to commencement of any improvements.
Park/Seal Rocks village Character		
The unique character of Seal Rocks will be	83	The Plan of Management has been amended to reduce built form and increase the
affected by the proposed Draft Plan of Management.		focus on caravan and camping sites in response to submissions and comments. Improvements such as the pool, cafe and putt-putt have been removed. The total number of proposed cabins/safari tents has been reduced from 31 to 18. The number of holiday vans has been reduced to further reduce the impact of built form. Site landscaping will support low key development and compliment the character of the adjoining lands.
The Draft Plan of Management proposes resort style development, which is not appropriate for Seal Rocks.	48	The amended Plan of Management is weighted towards the provision of sites for tents, caravan and camper vehicles. Fixed accommodation is less than 20%. The proposal is not for a "resort" and the Holiday Park will provide the sites, accommodation and facilities that are a usually found in a camping ground or caravan park.

Seal Rocks is a place of natural beauty, and any development will impact on these values.	38	A reduced range of improvements, a reduction in built form and landscaping will ensure the improved Holiday park is appropriate to the character and the capacity of the Reserve and the setting.
The Draft Plan of Management is an overdevelopment of the site.	32	The Plan of Management has been amended and the proposed range of improvements reduced. See above.
There is a need for increased landscaping at the park frontage and throughout the park.	11	The landscape buffer to Kinka Road has been increased, and landscaping is planned throughout the park. Plans will be developed in consultation with the NPWS.
Social Impact		
Affordability will be reduced by the Draft Plan of Management. The plans cater for high end tourists.	44	The provision of sites and facilities in the Holiday park will be focussed on caravanning and camping with 104 sites for tents, caravans and camper vehicles out of a total of 123 sites.
The Draft Plan of Management will impact on the social character of the village.	24	The Plan of Management proposes improvements to an existing caravan park that has operated on the land for many decades. The land use will not change and the focus will remain on the provision of sites for tents, caravans and camper vehicles.
The community does not want any development on the site.	27	These comments relate to the exhibited plan prior to its amendment in response to community input and represents the continuation of an existing land use. The Great lakes Council Draft DCP 2012 and the existing Seal Rocks DCP 45 state that caravan parks are an important resource for the provision of tourist accommodation.
Accommodation types		
The focus of the park should be on traditional low cost camping.	43	The Draft Plan of Management has been modified to reduce the number of cabins and holiday vans and increase the proportion of sites for traditional camping and caravanning.
There should be no more cabins in the park	21	Existing cabins have high occupancy rates and there is demand for more. The number of additional cabins has been significantly reduced. Safari tents will

		provide an alternative, less formal accommodation option.
Drive thru/en-suite sites are not needed	7	The drive through sites have been removed and the number of en-suite sites has been reduced, however, it is noted that en-suite sites are regularly requested in booking inquiries for the Park.
There should be more cabins in the park	12	Additional cabins/safari tents have been included in the Plan of Management.
Holiday vans		
All holiday vans should be retained	21	The Draft Plan of Management has been revised to allow a maximum of 16 holiday vans to remain in the park.
All holiday vans should be removed	20	The Draft Plan of Management has been revised to reduce the maximum number of holiday vans from 38 to 16.
Holiday vans should be reduced/some should remain.	8	see above
Infrastructure		
A general upgrade of park infrastructure is needed.	32	The Plan of Management provides for upgrading progressive of all essential infrastructure in the park.
Minimal upgrade to infrastructure only	12	Minimal upgrades will not address major structural/functional/environmental issues.
Roads need to be upgraded/sealed.	8	The revised Plan of Management provides for all roads to be re-aligned and sealed.
Sewerage system needs to be fixed	28	The revised Plan of Management provides for upgrading of the sewerage system.
Power should be provided to sites	12	The revised Plan of Management provides for power to be extended to all sites.
Amenities need to be upgraded	7	The revised Plan of Management provides for the main amenities building to be upgraded.

Water supply (tanks and bore) need to be improved	21	The revised Plan of Management provides for the water supply system within the park to be upgraded and fire-fighting facilities improved.
Recreation facilities		
The park does not need a pool	73	The pool has been removed from Plan of Management
The park does not need a café	37	The café has been removed from Plan of Management
Café supported	7	
Children's playground needed	9	A children's playground has been included in Plan of Management
Children's playground not needed	11	
2nd community building not needed	18	A second multi-purpose community building has been included in the Plan of Management to provide facilities for campers and caravanners.
Camp kitchen needed	17	A Camp Kitchen and Guest Lounge have been included in Plan of Management
Putt putt, jumping pillow not needed	12	The proposed putt putt and jumping pillow have been removed from the Plan of Management
Environmental impact		
The proposal will impact on groundwater and the aquifer.	11	A report on the capacity of the aquifer was commissioned in 2008 which found that future demand for water for the park would be only 4.3% of the estimated sustainable yield in a drought year. In addition the proposed improvements to the Park's water supply will reduce the level of dependence on water from the aquifer.
The proposal will impact on the adjacent Littoral Rainforest.	9	NPWS will be consulted as necessary where works within the 100 metre buffer to the Littoral Rainforest are proposed.
The proposal will impact on visual amenity	4	Increased setback from the road and additional landscaping will minimise impact on visual amenity from outside the park. Additional landscaping and

		reduction/relocation of holiday vans will further improve visual amenity within the park.
Bushfire safety has not been addressed	11	A draft fire mitigation plan has been prepared in conjunction with RFS, NPWS and GLC. NPWS have advised this plan will be reviewed, updated and finalised in near future. Also the proposed improvements to the Park water supply will improve the capacity of fire fighting facilities in the area.
Flooding/stormwater management has not been addressed.	8	The revised Plan of Management provides for an improved layout which will allow better stormwater management and reduce the incidence and severity of flooding.
Environmental management needs to be improved	13	The Plan of Management provides for significant improvements to environmental management across all the areas above.
There has been no consultation with NPWS	6	The NPWS has reviewed the Plan of Management and indicated there are no major issues with the revised plan. A number of matters raised by the NPWS submission have been incorporated into the Plan of Management and the Reserve Trust is committed to an ongoing cooperative relationship with the NPWS.
Financial concerns		
The development will not be viable in winter	14	Improved infrastructure, accommodation stock, fully serviced sites and group marketing will all contribute to achieving more consistent year round occupancy.
Economic return has been the main driver for the Draft Plan of Management	36	Optimising financial performance along with improved environmental outcomes are two of the key outcomes which have been addressed in the Plan of Management. However, the Plan of Management addresses the range of issues that are required to be met in the management of reserved Crown land.
Opposed to the sale of Crown Land	17	There is no proposal to sell Crown Land
Traffic		
The proposal will increase traffic and roads cannot cope	19	Traffic flow into and out of the park will be improved with a redesigned entry.

Pedestrian access to the beach is not safe	12	A defined pedestrian entry/exit point from the park has been identified. Improved safety to the beach access will be provided in consultation with Great Lakes Council.

APPENDIX 2

Minutes of Information Meeting of 15th March 2012

SEAL ROCKS HOLIDAY PARK

PLAN OF MANAGEMENT - INFORMATION SESSION

MINUTES OF 15 MARCH 2012

Level 3/437 Hunter Street, Newcastle

ATTENDEES: Karen Hembrow, Jim Bolger, Neville Green, Mark Lee, Ruth Higginbottom, Greg Thompson, Bernard King, John Allen, John Sweetensen, Judy Donnelly.

Meeting commenced at 10:08am.

Jim Bolger provided an overview, to discuss changes made, outline the staged implementation plan, provide an opportunity for the document to be finetuned and provided an opportunity to discuss the revised Plan of Management that was originally exhibited from 23 March 2010 to 21 May 2010.

Written and email submissions were received in response to the draft and significant changes were made to the exhibited document.

The changes included:

- Reduction in number of cabins from 31 to 19 (including eco tents)
- Removal of the proposed swimming pool and new community building
- Replacement of proposed cafe with a guest lounge
- Increased number of powered sties
- Total number of sites reduced from 133 to 121
- Increased setback to provide a landscaped buffer
- Reduction in number and location of holiday vans
- Revised road, drainage and site layouts.

The following questions were raised:

 Guest lounge, camp kitchen with seating – This is proposed to be constructed on the current manager's residence site. It is a lounge area allocated for social gatherings, place to meet for coffee etc.

- 2. Reduction of cabins to 19 this is proposed to comprise 6 safari tents (eco tents) and 13 cabins.
- 3. Walls of the cabins may have an impact on light spill the cabins have been situated in a discrete area away from campers and lighting will be managed to minimise impact on all surrounding areas.
- 4. Why was the cafe and pool removed due to opposition received from the feedback from the exhibition held from 23 March to 21 May 2010 the cafe and pool were removed from the plan. The Trust also supports the view that these facilities are not required at the park.
- 5. Are the barbeques available for all campers? Are the barbeques in the cabin precinct exclusive to the cabins? The objectives are to have barbeques close to sites but are available for use by everyone. There is no exclusive community areas in the park.
- 6. Compliance are there fire regulations? The proposed plan doesn't show fire hydrants. The Park will comply with fire regulations.
- 7. Holiday Vans and camping sites the holiday vans on Crown Land are governed by legislation Holiday Parks (Long Term Casual Occupation) Act 2002)– stays of up to 180 days per year are allowed with 90 days removal notice. Cabins are available 365 days of the year.
 - a. Crown Land Parks are open to all people to enjoy. There will be 19 cabins and 102 camping site at Seal Rocks Holiday Park when the work has been completed.
 - b. The number of proposed holiday vans is 12 with the allocation to be determined by ballot.
 - All holiday vans will be required to be removed from the park after the end of January 2013 with the 12 allocated sites planned return to be prior to December 2013. All returning holiday vans will be required to be compliant.
 - d. There will be no camping on fire breaks in the revised plan and no provision for overflow.
- 8. Road surface the road surface will be single coat seal with no kerb and guttering. This work is scheduled to be done during winter 2013.
- 9. *Electricity* –the plan is to provide fully serviced sites but will be revised if necessary. There was discussion regarding having all sites powered. Jim advised one option

that could be looked at is to install the infrastructure for the power but not providing an outlet to every site pending an electrical engineers advice.

- 10. *Brownouts and blackouts* Jim advised the potential to seek advice from an electrical engineer regarding this matter.
- 11. Landscape buffer the buffer will be a 15 metre setback with landscape consisting of local indigenous plants.
- 12. Pedestrian issues the pedestrian issues will be addressed to formalise access rather than people making their own access.
- 13. Service Road and the increased bitumen area in regard to the rainforest- The batter adjacent to the proposed service road will be revegetated in consultation with National Parks and Council.
- 14. Financial the figures quoted in the presentation at the meeting are based on the number of sites not the number of people (soft copy provided)
- 15. Photovoltaic Environmental consideration will be incorporated where ever viable in the park. To date the NCAT has won a number of environmental awards for their work.

Neville explained the different precincts and proposed staging for the redevelopment works.

Stage1 works are proposed in the southern short term precinct (blue), and part of the central short term precinct (green). This will create 92 short term sites, with the proposed 12 holiday van sites located along the south eastern boundary. The front part of the park will continue to operate during this period, and holiday vans can return to the park at the completion of this stage.. The works are ;

- Installation of new water, sewer, fire service and power to 92 sites
- Reconfiguration of the internal road network and site regrading
- Upgrading of the wastewater treatment plant, and
- Installation of a camp kitchen, playground and 2 bbg shelters

Stage 2 works are proposed for the entry precinct (yellow), and the remainder of the central short term precinct (green). These works will relocate the park entry road, reception, managers residence and workshop, and complete the remainder of the short term sites for the park (13 sites). The works are;

- Reconfiguration of entry and internal roads
- Installation of new park office, residence and workshop
- Installation of new water, sewer, fire service and power to 13 sites.
- Landscaping of the buffer zone to Seal Rocks Road, and
- Upgrading of the southern amenities building

Stage 3 works are proposed in the northern accommodation precinct (orange). This will be the first new fixed accommodation to be installed at the park. The works are;

- Installation of 6 new safari tents and 3 new cabins
- A new communal guest lounge on the site of the current managers residence, and
- A new communal activity area on the site of the current workshop.

Stage 4 works complete the northern accommodation precinct. The works are;

- Installation of 6 new cabins
- Upgrading of the northern amenities/laundry building
- A bbg shelter, and
- an ensuite unit for the central precinct

Neville advised the Mid North Coast Accommodation Trust works closely with National Parks and Council. It was stated at the meeting that National Parks submitted comments regarding the original Draft Plan of Management. (However, this was not the case and those at the meeting have been notified by email of the error).

There will be an eight metre wide open grassed swale for stormwater drainage along the southern and eastern boundaries. This will prevent stormwater from ponding on the site and discharge along the proposed service road.

Service vehicles for gas supply, garbage removal etc will access the park via the Service Road in the entry Precinct and not through the park itself.

The upgrade is proposed to take place in four stages over a number of years to minimise impact on the park and its guests.

The proposed dates for commencement are post Easter 2013 with completion by December 2013. The proposed plan is to have 12 holiday vans returned by December 2013. The

current holiday vans owners may elect to go into the ballot to be one of the 12. The fee structure has not yet been set.

An extension of time was requested and granted from the proposed 10 days to 21 days from the meeting of the 15 March 2013 – being Thursday 5 April 2012. This was subsequently extended by Jim Bolger to allow comments up to 11 April 2012

Comments should be forwarded to Jim Bolger, General Manager North Coast Holiday

Parks PO Box 647, Ballina NSW 2478 or emailed to jim@nchp.com.au by the COB 11

April 2012

The meeting closed at 11:50am.

APPENDIX 3

Submission from the National Parks and Wildlife Service





Our reference:

DOC12/20310

Mr Jim Bolger North Coast Holiday Parks PO Box 63 URUNGA NSW 2455

Dear Mr Bolger,

RE: Submission on the final draft Plan of Management for Seal Rocks Holiday Park 23 March 2012 version.

The Great Lakes Area of the National Parks and Wildlife Service (NPWS) has reviewed the proposed Plan of Management (POM) for the Seal Rocks Holiday Park (12 March 2012 version), prepared on behalf of the Mid North Coast Accommodation Trust (MNCAT).

In previous years NPWS and Great Lakes Council developed an effective cooperative relationship to identify and manage neighbour and boundary issues including fire protection, pest management, weed control, boundary fencing and access. The NPWS encourages a continuation of the cooperative approach between the NPWS Great Lakes Area Office and MNCAT to managing such issues.

The NPWS provides the following comments on the draft POM:

- 1. Conservation and protection of the neighbouring Myall Lakes National Park:
 - The NPWS requests that prior to proceeding with developments including new buildings or facilities either permanent or relocatable within the 100m buffer zone of SEPP26 rainforest, proposals are to be forwarded to the NPWS Great Lakes Area office for notification and comment.
 - The NPWS will continue to undertake conservation programs to protect and enhance vegetation communities within Myall Lakes NP, including the littoral rainforest at Seal Rocks. Previously, cooperative programs between NPWS, Great Lakes Council and at times the LPMA (former Dept of Lands) have focused on pest and weed control programs, access for local community fire management. Assistance has been provided by the managers of the Seal Rocks Holiday Park. NPWS requests that assistance from the managers in undertaking conservation and fire management programs, particularly on the common boundary, continues.
 - The NPWS supports the preparation of a vegetation management plan and landscaping strategy and planting program for the holiday park, in consultation with NPWS. Revegetation and landscaping plans should consider local native plant species and communities, and ensure that no new plantings impact upon the biodiversity of the national park. Local and endemic plant species should be used in any landscaping in the Holiday Park.
 - The NPWS supports the cooperative approach proposed for management of drainage within and from the Holiday Park that may impact on the neighbouring national park.
 - A clear physical definition of the boundary between the National Park and the Holiday Park in the form of a fence is preferred. This issue has been raised many times with the current owners and

is an ongoing project both parties have been working towards. It is noted in section 6.1.1 Vegetation and Habitat Management to minimize disturbance on native vegetation where fencing is an option the park edge should be defined with a fence. NPWS has a Boundary Fence Policy which will apply in this instance. Defining the boundary with a fence will reduce encroachments, clearly identify ground maintenance areas and provide a clear delineation between the National Park and Holiday Park.

2. Bush Fire Planning and Protection:

- The NPWS note the reference to the draft fire mitigation plan in the POM (Appendix 4). This fire
 plan forms part of a wider Village Protection Plan for bush fire protection for the Seal Rocks
 village. The Village Protection Plan is to be reviewed in the near future. It is noted in section
 6.1.1 and 6.1.5 the MNCAT intends to participate in the revision of the Seal Rocks Bushfire
 Village Protection Plan.
- Access to install the proposed larger capacity water tank (including access for maintenance) will need to be negotiated with NPWS. Currently, under the MLNP Plan of Management Amendment adopted in 2006 there is not an authorised management trail to the proposed location. Access through the national park to install and use the water tank for bulk water use as a community fire fighting resource and maintenance of the tank and transpiration area will need formal consent from NPWS.
- Given the lack of water sources at Seal Rocks, NPWS request that the proposed new water tank should be equipped with suitable infrastructure to allow quick filling of fire fighting appliances (both NPWS and RFS) in bush fire emergencies.

3. Management of rubbish and rubbish dumping in the National Park:

The edges of the littoral rainforest at the national park boundary contain a considerable amount
of rubbish which has accumulated over the years. A suitable fence that traps wind blown litter
and regular cleanup of dumped litter should be considered as part of an ongoing comprehensive
waste management program for the holiday park.

4. Restoration of unauthorized tracks:

The NPWS request that any unauthorized tracks from the existing Holiday Park that encroach
into the national park are restored and rehabilitated including removal of any structures. The
rehabilitation should be carried out under a plan approved by NPWS and at the cost of the
MNCAT.

Cooperative weed management programs:

• The NPWS, Great Lakes Council and a local volunteer group have spent considerable time and effort on controlling bitou bush (and other weed species) under restoration programs around the Seal Rocks village. As the MNCAT is now a land manager and part of the community at Seal Rocks, the NPWS encourage MNCAT to continue ongoing weed control programs within the holiday park, and support cooperative control programs with NPWS and Great Lakes Council, contractors and community volunteers.

Public education and tourism at Seal Rocks:

• As the Seal Rocks Holiday Park is located in a small coastal village, surrounded by National Park, it is important that information is included in the holiday parks information that encourages appropriate visitor behaviour. This includes warnings against the feeding of wildlife, requirements for 4WD beach driving, camp fires and recreational activities. Many of the Seal Rocks Holiday Park guests visit Myall Lakes National Park, including the Sugarloaf Point Lighthouse and Lighthouse Beach as part of their stay. The Seal Rocks Holiday Park is an important information point to ensure guests have accurate information regarding the use of Myall Lakes National park. MNCAT can continue to support this role by providing the local national park brochure and other park information (as supplied by NPWS), having important seasonal national park information available as a link on the Holiday Park's web page, and being a sales agent for the provision of

national park vehicle passes, which are required for entry into Myall Lakes National Park and particularly for 4WD access on Lighthouse Beach.

Thank you for the opportunity to provide comment on the draft Plan of Management for Seal Rocks Holiday Park. If you have any questions in relation to this response please contact Rachel Kempers or myself on 65910300.

Yours sincerely

Stephen Smith

Great Lakes Area Manager

National Parks and Wildlife Service

APPENDIX 4

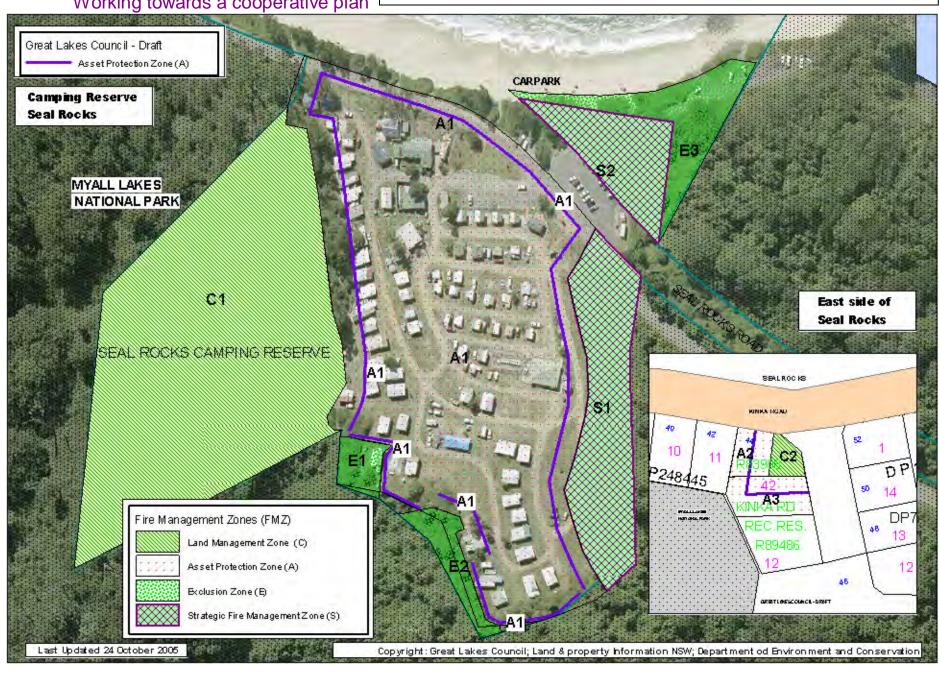
Draft Fire Mitigation Plan

Draft Fire Mitigation Plan Seal Rocks

Last modified 17/11/2005 -

Working towards a cooperative plan





Zone	Type of Zone ¹	Action & Objective	Minimum Fire Interval (years)	Maximum Fuel Load ² tonnes per hectare	Responsible Authority
A1	APZ ³	Creation & maintenance of APZ by slashing, in line with <i>Guidelines for</i> Asset Protection Zones ⁴ (The Code ⁵ /PBFP ⁶) within Seal Rocks Camping Reserve from 5-25m width.	N/A	NA – maintain discontinuous fuel to a maximum 8 tons/ha	Great :Lakes Council (GLC)
A2	APZ	Creation & maintenance of APZ by slashing, in line with Guidelines for Asset Protection Zones (The Code/PBFP) a 17m width.	N/A	NA – maintain discontinuous fuel to a maximum 8 tons/ha	GLC
А3	APZ	Maintenance of APZ by slashing, in line with <i>Guidelines for Asset</i> Protection Zones (The Code/PBFP) a 18m width.	N/A	NA – maintain discontinuous fuel to a maximum 8 tons/ha	GLC
S1	SFAZ ⁷	Use mechanical methods or prescribed burning to reduce spotting potential & reduce fire intensity.	N/A	10	GLC
S2	SFAZ	Use mechanical methods/maintenance of the carpark surface and verge.	N/A	10	GLC
C1	LMZ ⁸	Mosaic prescribed burning to manage for biodiversity for vegetation communities.	Meet biodiversity fire regimes.	N/A	GLC
C2	LMZ	Prescribed burning to manage for biodiversity for vegetation communities.	Meet biodiversity fire regimes.	N/A	GLC
E1,E2	EZ ⁹	Fire exclusion to protect SEPP 26 and prevent the spread of weeds such as Bitou Bush/Lantana, and to promote the health of the dune vegetation.	N/A	N/A	GLC
E3	EZ	Fire exclusion to protect Coastal Dune system and prevent the spread of weeds such as Bitou Bush/Lantana, and to promote the health of the foredune vegetation.	N/A	N/A	GLC
Roads & Fire Trails/Access trails		Maintenance as per agency policies & guidelines.	N/A	N/A	GLC

Adopted: _

Exhibited: _

¹ For the objectives of the different types of zone see the Lower Hunter Bush Fire Risk Management Plan (Lower Hunter Bush Fire Management Committee, 2002). ² Fuel loads must be measured in accordance with the Overall Fuel Hazard Guide (Natural Resources and Environment, 1999) or (Overall Fuel Hazard Guide, Sydney NSW NPWS 2002).

³ APZ – Asset Protection Zone.

Guidelines for Asset Protection Zones (NSW Rural Fire Service 2003).

⁵ Bushfire Environmental Assessment Code for Asset Protection and Strategic Fire Management Zones (NSW Rural Fire Service 2003), (The Code).

⁶ Planning for Bushfire Protection (NSW Rural Fire Service 2001), (PBFP).

⁷ SFAZ – Strategic Fire Management Zone.

⁸ LMZ – Land Management Zone. ⁹ EZ – Fire Exclusion Zone.

Appendix 5

Seal Rocks Littoral Rainforest, Seal Rocks Rd, Seal Rocks, NSW, Australia - extract from the Register of the National Estate

Seal Rocks Littoral Rainforest, Seal Rocks Rd, Seal Rocks, NSW, Australia

Photographs	None
List	Register of the National Estate
Class	Natural
Legal Status	Registered (24/06/1997)
Place ID	18851
Place File No	1/09/080/0035

Statement of Significance

Approximately 20ha of littoral rainforest occur at Seal Rocks. This plant community type is now rare in New South Wales. The Seal Rocks littoral rainforest contains a relatively high diversity of native plant species with sixty four tree and shrub species and twenty three species of climber. A further indication of this diversity is that these species represent over fifty different plant families. The association of species found in the rainforest is unusual and is not found anywhere else in the mid north coast region of New South Wales. Four rainforest plant species are at their most southerly geographic limit of distribution at Seal Rocks, while a further six rainforest plant species are nearing their southernmost geographic limit of distribution.

The littoral rainforest at Seal Rocks is readily accessible and demonstrates well dynamic vegetation processes. For these reasons the place has value as an education site.

Official Values Not Available

Description

The Seal Rocks littoral rainforest is located in a broad shallow gully sloping fairly steeply and facing the sea. The gully is sheltered from onshore winds and has a good supply of groundwater. The soils are podzolic sands and originated from Holocene (approximately 6,000 year old) sand dunes which accumulated over the top of siltstone of the Yagon formation. This rock outcrop contains some basalt fragments which render the overlying soils quite fertile as the bedrock is within 2.5m of the surface. The township of Seal Rocks is adjacent in the east, while a caravan park is located to the north. The rainforest is bounded to the west by stabilised parabolic dune blow outs. The rainforest is fairly well defined and has been variously classified as dry rainforest, subtropical rainforest, swamp rainforest, headland thicket or

palm forest. The rainforest occupies a total area of approximately 20ha. In areas of least canopy disturbance the average canopy height is 25m with emergents to 40m. There is a close cover of trees with a dense tangle of vines. The continuity of the canopy severely inhibits light penetration so that there is little or no groundcover. Occasionally shade tolerant ferns such as DOODIA ASPERA may occur. Common canopy species include cabbage fan palm (LIVISTONA AUSTRALIS), myrtle ebony (DIOSPYROS PENTAMERA), bolwarra (EUPOMATIA LAURINA), brittlewood (CLAOXYLON AUSTRALE), yellow tulipwood (DRYPETES AUSTRALASICA), scentless rosewood (SYNOUM GLANDULOSUM), silver aspen (ACRONYCHIA WILCOXIANA) and black apple (PLANCHONELLA AUSTRALIS). Seventy five species of birds have been recorded in the Seal Rocks littoral rainforest. Nectar and fruit eaters along with small insectivores are the most common. Birds present in the rainforest include the rufous fantail (RHIPIDURA RUFIFRONS), southern fig bird (SPHECOTHERES VIRIDIS spp. Vieilloti), regent bower bird (SERICULUS CHRYSOCEPHALUS), green winged pigeon (CHALCOPHAPS INDICA), scaly breasted lorikeet (TRICHOGLOSSUS CHLOROLEPIDOTUS) and scarlet honeyeater (MYZOMELA SANGUINOLENTA).

History Not Available

Condition and Integrity

Generally the littoral rainforest patches are in a fair condition. About 5ha of the rainforest adjacent to the caravan park has been subject to severe dieback as a result of fire, and exposure to salt laden winds, and severe infestation with latana in exposed areas and around the edges. The lantana does however appear to be providing some protection from wind on these exposed edges, thus preventing further dieback. Most of the rest of the forest patches have intact canopy and abundant seedling regeneration, although the main road to Seal Rocks village bisects the area. There is also a large clearing on the cliff top at the northern edge of the forest. There is also an abandoned quarry site on the seaward side of the eastern rainforest stand. (1996)

Location

About 45ha, at Seal Rocks, comprising the following two areas:

- 1) The area bounded by a line commencing at AMG point MK54501165, then proceeding directly to the northern side of Seal Rocks Rd at AMG easting 254650m east (approximate AMG point 54651132), then easterly via the northern side of Seal Rocks Road to AMG easting 254950m east (approximate AMG point 54951143), then directly to AMG point 54751175, then directly to the commencement point.
- 2) Commencing at the intersection of Mean High Water Mark and AMG easting 255170m east (approximate AMG point 55171142), then via straight lines joining the latter point and the following AMG points consecutively: 55171117 and 55101117, then directly to the 40m above sea level contour at approximate AMG point 54991125, then south-westerly via the 40m above sea level contour to AMG northing 6410720m north (approximate AMG point 54751072), then via straight lines joining the latter point and the following AMG points consecutively 54921057 and 55221100, then directly to the north-western edge of the road reserve of an unnamed road at approximate AMG point 55401080, then northeasterly via the north-western side of that road reserve to AMG northing 6411000m north (approximate AMG point 55551100), then directly to AMG point 55501102, then directly to Mean High Water Mark at approximate AMG point 55651112, then north-westerly via High Water Mark to the commencement point.

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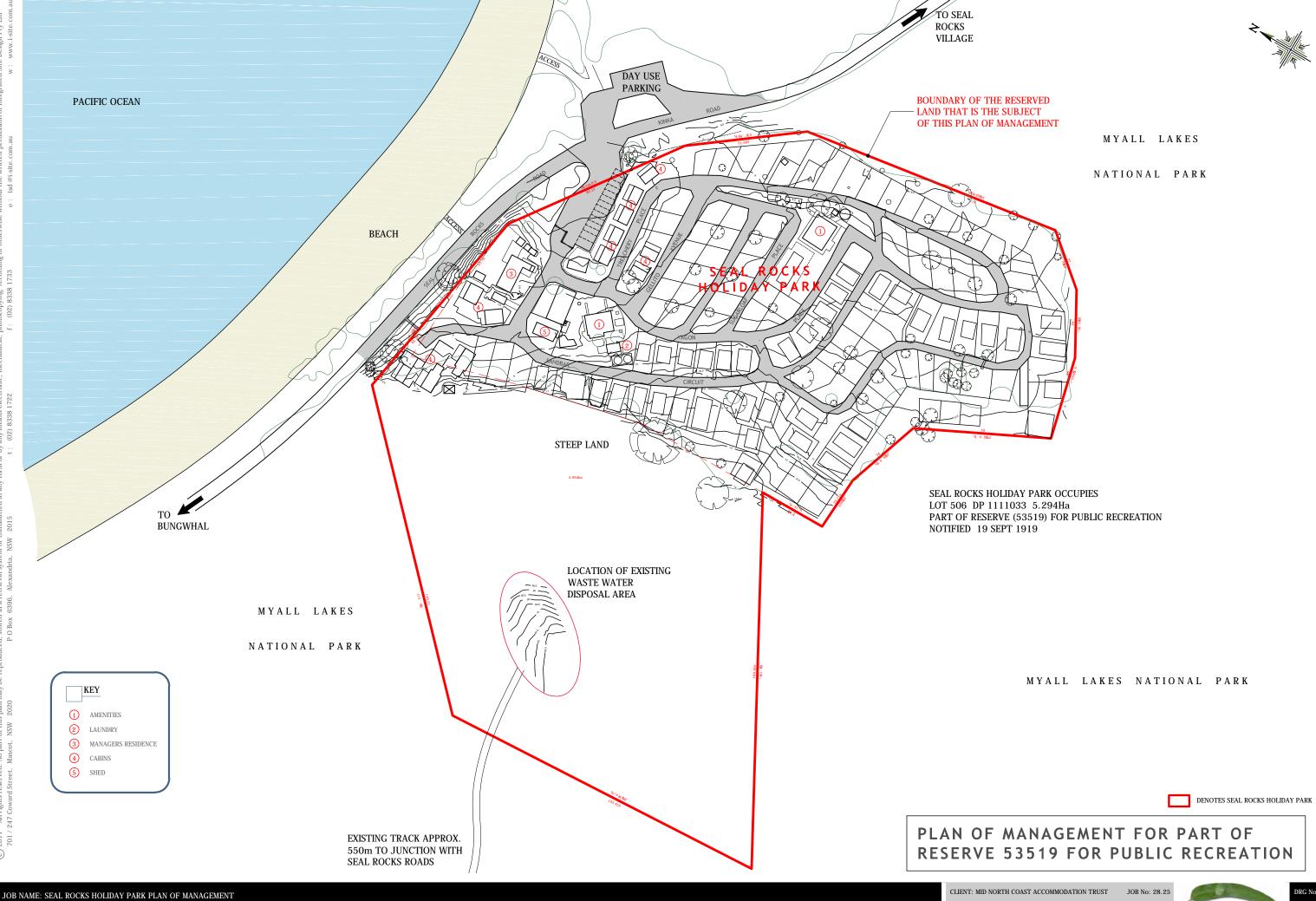
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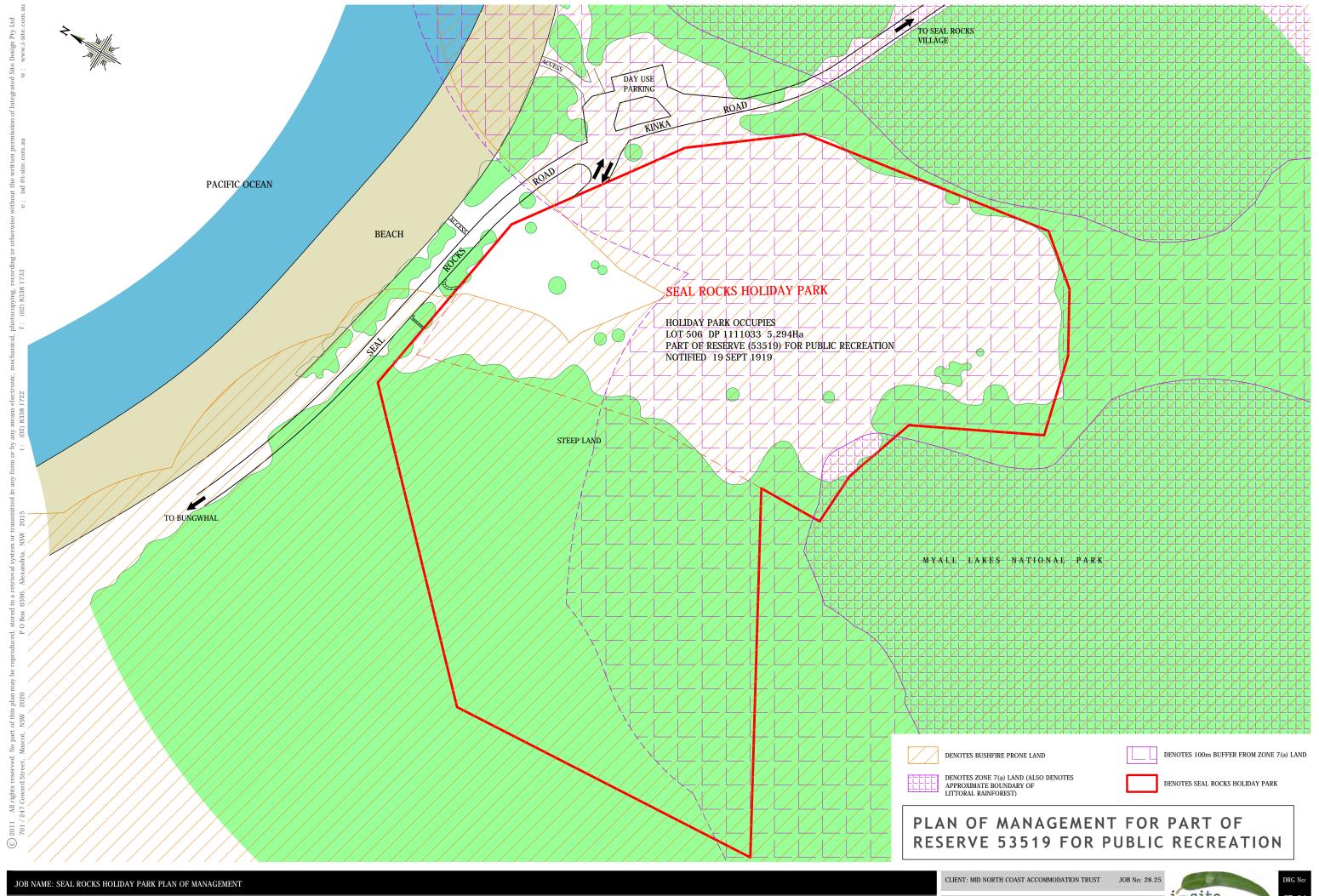
APPENDIX 6

Drawings

SR 00	Survey Plan of Existing Facilities, Site Layout and Land Boundaries	
SR 01	Context Plan - Zoning and Bushfire Prone Land	
SR 02	Existing Holiday Park Site Plan	
SR 03A	Proposed Improvement Plan	
SR 04	Proposed Overall Site Plan including Western Precinct	
C 03	Proposed Site Plan as placed on public exhibition on 23 rd March 2010	

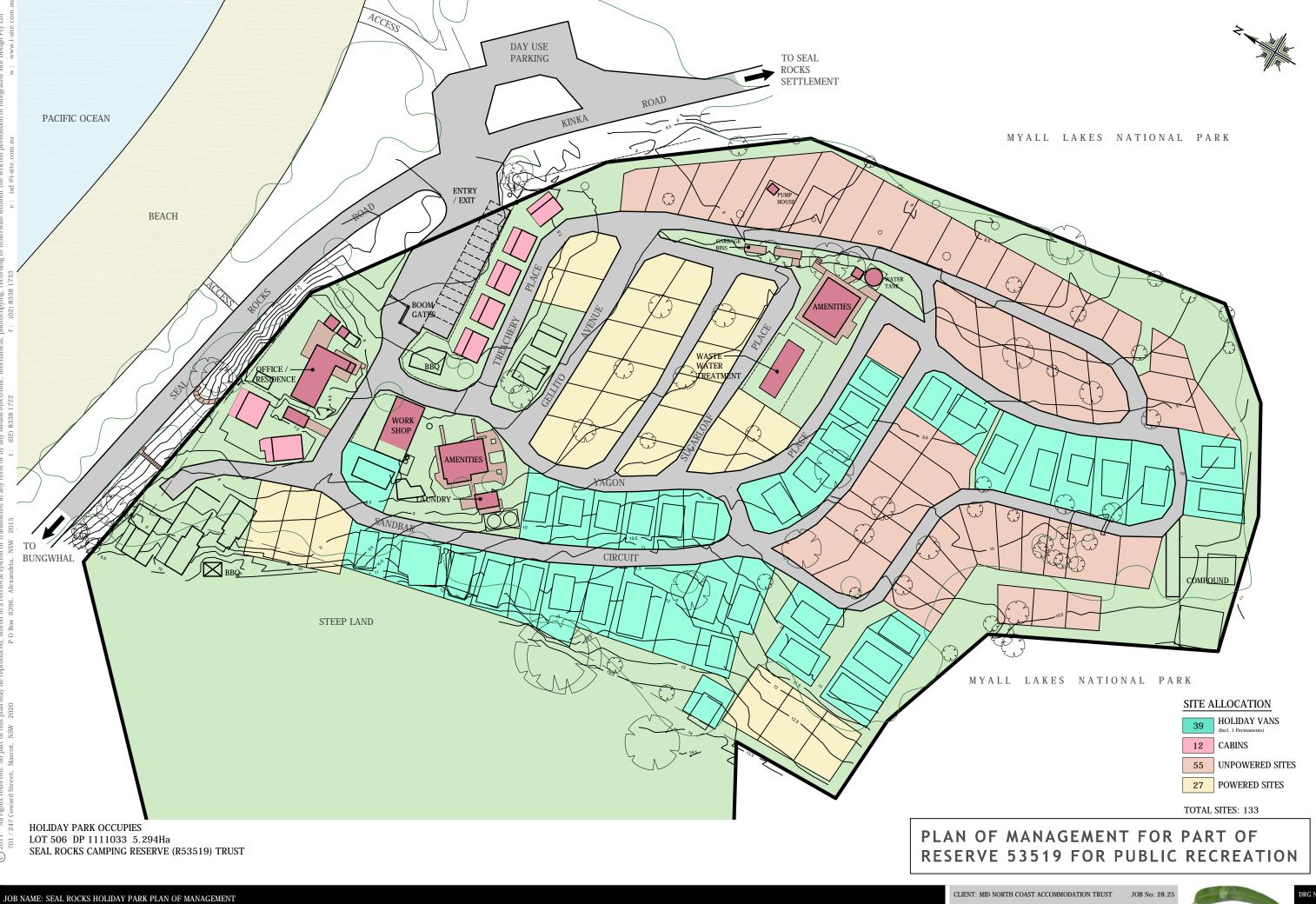


i-site..... A2 SCALE: 1.1000 DATE: AUGUST 2012



i-site.....





A2 SCALE: 1.600 i-site.....

PARK ENTRY PRECINCT

THE PRECINCT WILL PROVIDE FACILITIES TO ENSURE PARK MANAGEMENT HAS THE CAPACITY TO MANAGE DAY TO DAY OPERATIONS EFFICIENTLY AND TO MEET THE REASONABLE EXPECTATIONS OF THE PARK'S GUESTS

- UTILISING THE EXISTING ACCESS POINT FROM SEAL ROCKS ROAD RE-CONFIGURE THE CARAVAN PARK ENTRY FORECOURT AND ESTABLISH ARRIVAL AND DEPARTURE LAY-BYS WITH BOOM GATES TO CONTROL ACCESS AND PROVIDE SECURITY FOR GUESTS AND MANAGEMENT.
- CONSTRUCT VISITOR PARKING SPACES TO COMPLY WITH THE REQUIREMENTS OF THE CARAVAN PARK REGULATIONS.
- INSTALL A NEW MANAGER'S RESIDENCE AND OFFICE IN ACCORDANCE WITH THE REQUIREMENTS OF THE CARAVAN PARK REGULATIONS. ESTABLISH PARK MAINTENANCE AND STORAGE FACILITIES THROUGH THE PROVISION OF PURPOSE DESIGNED, SECURE AREAS AND BUILDINGS FOR VEHICLES, EQUIPMENT AND MATERIALS. ESTABLISH A DISCRETE ENTRY FOR SERVICE VEHICLES.

NORTHERN ACCOMMODATION PRECINCT

THE NORTHERN PRECINCT WILL SUPPORT 18 SHORT-TERM SITES. THE SHORT-TERM SITES WILL FACILITATE THE UPGRADE AND EXPANSION OF THE PARK'S STOCK OF ACCOMMODATION FOR TOURISTS. THE PRECINCT WILL ALSO SUPPORT AN EXPANDED RANGE OF ANCILLARY FACILITIES FOR GUESTS.

- REMOVE THE EXISTING PARKING AREA AND BOOM GATES AND REHABILITATE THE LAND TO SUPPORT THE INSTALLATION OF NEW CABIN/SAFARI TENT ACCOMMODATION. REPLACE THE EXISTING PARKING AREA WITH A 10 TO 15 METRE WIDE LANDSCAPED BUFFER. INSTALL NEW HOLIDAY ACCOMMODATION BEHIND THE LANDSCAPED AREA AND INCLUDE ONE UNIT DESIGNED TO FULFIL DISABLED ACCESS REQUIREMENTS AND COMPLIANCE WITH RELEVANT AUSTRALIAN LEGISLATION AND STANDARDS
- NSTALL CABINS AND SAFARI TENTS INCLUDING ONE ACCESSIBLE CABIN. DEVELOP A LANDSCAPED ACCESS CORRIDOR AND PATHWAY SYSTEM TO LINK WITH OTHER PRECINCTS AND ESTABLISH SAFE ACCESS TO THE ANCILLARY FACILITIES AND ACROSS SEAL ROCKS ROAD.
- REMOVE OR MODIFY THE EXISTING MANAGER'S RESIDENCE AND INSTALL A OMMUNAL LOUNGE FOR THE USE OF ALL GUESTS.

- RATIONALISE THE ROAD AND PARKING LAYOUT FOR THE CABINS/SAFARI TENTS IN THIS PART OF THE PARK AND IMPROVE THE EXISTING SEATING AND
- DEMOLISH THE EXISTING WORKSHOP AND DEVELOP AN OUTDOOR ACTIVITY ZONE FOR OLDER CHILDREN.
- RENOVATE AND EXTEND THE EXISTING AMENITY BUILDING TO PROVIDE LAUNDRY FACILITIES AND TO HOUSE EQUIPMENT ASSOCIATED WITH THE EFFICIENT FUNCTIONING OF THE PARK'S WATER SUPPLY SYSTEM.
- DEMOLISH THE EXISTING LAUNDRY AND REMOVE EXISTING WATER STORAGE TANKS. CONSTRUCT A SMALL BARBECUE SHELTER.
- NSTALL NEW CABINS/TENTS ON EXISTING SHORT-TERM SITES. ENSURE INSTALLATION HAS NO ADVERSE IMPACT ON EXISTING NATURAL VEGETATION IN THIS PART OF THE PARK. IMPLEMENT MEASURES TO EFFECTIVELY DEAL WITH STORMWATER FLOWING INTO THE PARK FROM THE STEEP LAND TO THE

CENTRAL SHORT TERM PRECINCT

THE CENTRAL PRECINCT WILL SUPPLY 34 SHORT TERM SITES THAT ARE PROPERLY SERVICED AND CAPABLE OF ACCOMMODATING A RANGE OF CARAVANS, CAMPER AND RECREATIONAL VEHICLES AND TENTS.

- INSTALL EN-SUITE FACILITY UNITS TO SERVICE FOUR SHORT TERM SITES.
- CONSTRUCT A BARBECUE SHELTER.
- ALTER THE EXISTING ROAD LAYOUT TO MAKE BETTER USE OF THE AVAILABLE LAND AND PROVIDE SITES SUITABLE FOR USE BY CARAVANS AND CAMPER VEHICLES.
- INSTALL A CAMP KITCHEN WITH BARBECUES, HOTPLATES, CAMPER'S WASH-UP FACILITIES, REFRIGERATION AND UNDERCOVER SEATING.
- CONSTRUCT A CONTEMPORARY PLAYGROUND FOR YOUNGER CHILDREN.

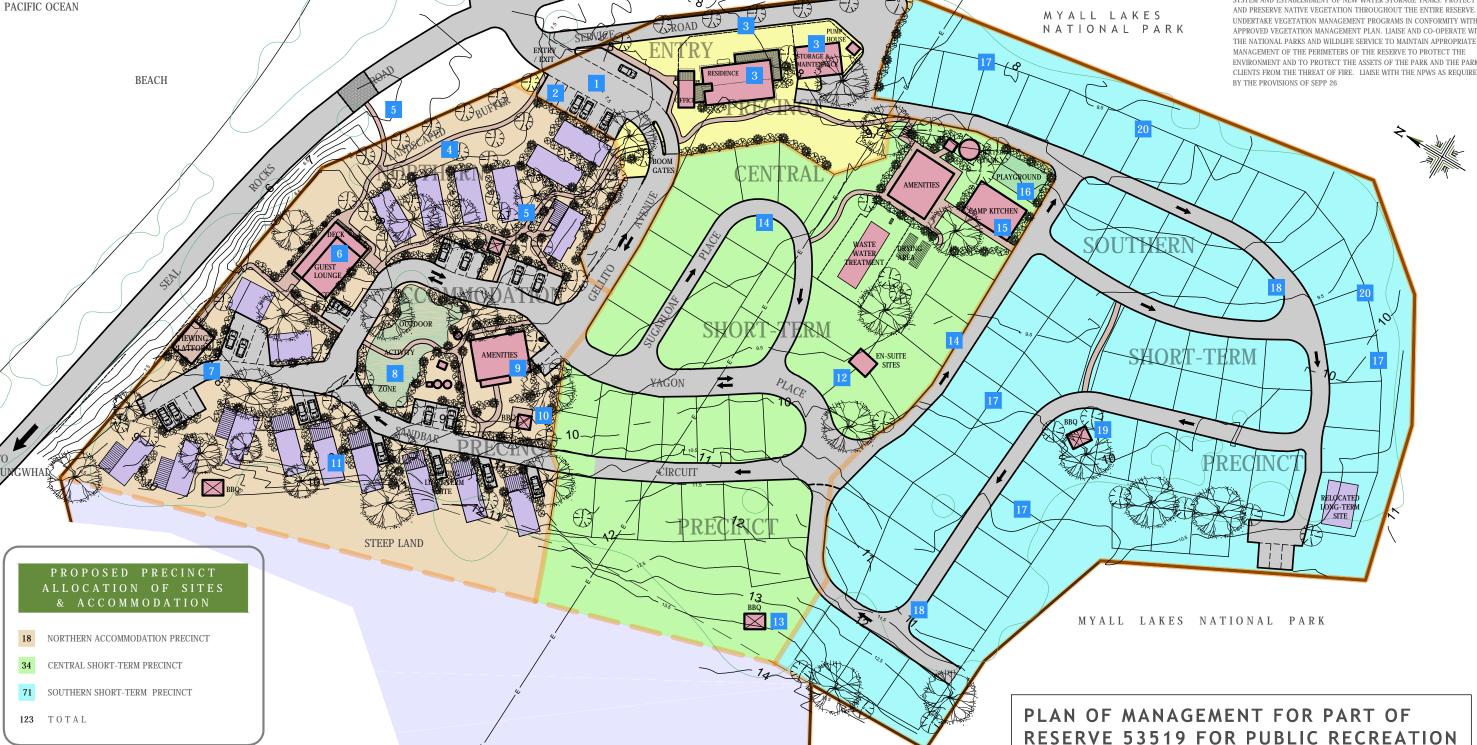
SOUTHERN SHORT TERM AND CAMPING

THE SOUTHERN PRECINCT WILL SUPPLY 70 SHORT TERM SITES THAT ARE PROPERLY SERVICED AND CAPABLE OF ACCOMMODATING CARAVANS, CAMPER AND RECREATIONAL VEHICLES AND TENTS. DEPENDING UPON THE POLICY REQUIREMENTS OF THE GOVERNMENT AND THE TRUST THERE MAY BE SOME OPPORTUNITY TO ALLOW SOME HOLIDAY VANS WITHIN THE PRECINCT. THE PRECINCT WILL ALSO INCLUDE ONE LONG-TERM SITE.

- PROVIDE POWER, WATER AND SULLAGE TO EXISTING SITES.
- RE-ALIGN EXISTING ROADS AND PROGRESSIVELY UPGRADE ROAD SURFACES AND STORMWATER DRAINAGE.
- CONSTRUCT A SMALL BARBECUE SHELTER.
- LLOCATE 16 SITES FOR INSTALLATION OF HOLIDAY VANS MAINTAIN 5 TO 10 METRE SETBACK FROM BOUNDARY WITH NATIONAL PARK

GENERAL

MAINTAIN AND UPGRADE UTILITY SERVICES THROUGHOUT THE PARK INCLUDING IMPROVEMENTS TO THE EXISTING WASTEWATER TREATMENT SYSTEM AND ESTABLISHMENT OF NEW WATER STORAGE TANKS. PROTECT AND PRESERVE NATIVE VEGETATION THROUGHOUT THE ENTIRE RESERVE. UNDERTAKE VEGETATION MANAGEMENT PROGRAMS IN CONFORMITY WITH AN APPROVED VEGETATION MANAGEMENT PLAN. LIAISE AND CO-OPERATE WITH THE NATIONAL PARKS AND WILDLIFE SERVICE TO MAINTAIN APPROPRIATE MANAGEMENT OF THE PERIMETERS OF THE RESERVE TO PROTECT THE ENVIRONMENT AND TO PROTECT THE ASSETS OF THE PARK AND THE PARK'S CLIENTS FROM THE THREAT OF FIRE. LIAISE WITH THE NPWS AS REQUIRED



JOB NAME: SEAL ROCKS HOLIDAY PARK PLAN OF MANAGEMENT

CLIENT: MID NORTH COAST ACCOMMODATION TRUST JOB No: 11.13





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