# THE STEPS BARRINGTON CAMPGROUND

535 Manchester Road

Lot 681 DP786066

Applicant: Brian Kilby DATE: 18 August 2024

# STATEMENT OF ENVIRONMENTAL EFFECTS

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#### Statement of Environmental Effects

This Statement of Environmental Effects has been produced to accompany the applicant's Modification of Development Application for Tourist Development incorporating Primitive Campground, Educational Facility and Self-Contained Accommodation. It has been designed with consideration of relevant provisions of the Gloucester Local Environmental Plan 2010 and Gloucester Shire Council Development Control Plan 2010.

Applicant's Name: Brian Kilby

Location of Development: Lot: 681

DP786066

Street No. 535

Street Name: Manchester Road

Suburb/Town: Bindera

Postcode: 2422

#### 1. Introduction

#### 1.1 Overview of Proposal

The Steps Barrington is located at 535 Manchester Rd, Bindera, southwest of the township of Gloucester and adjacent to the Barrington River. The land is formally recognised as Lot 681 DP 786066. The site is developed for the purposes of a primitive camping ground and the original consent allowed for 120 visitors to the site over 8 camp sites. The park is currently operated with 14 camp sites as sub sites of the original 8. There are 3 existing amenities blocks servicing the campers. The main amenities block with flushing toilets and hot showers, the old amenities block (currently unused) and the composting toilet block.

The Steps Barrington is also a popular destination for day visitors to the region. Visitors come for picnics, swimming, walking, river sledding and to mountain bike.

The applicant is seeking to amend the existing DA for Tourist Development incorporating Primitive Campground, Educational Facility and Self-Contained Accommodation.

Specifically Consent Condition 57 to reflect 14 camping sites (as required by Primitive Camping Guidelines) and increase the maximum occupancy at any one time to 271, in line with the bushfire assessment and waste water treatment capacity.

The applicant would also like to construct an administration building to service day to day operations and provide a bush fire refuge.

# 1.2 Present and Previous uses of the site and surrounding land

Lot 681 is surrounded by rural blocks of mixed usage including residential and holiday residences/accommodation. The north boundary abuts Manchester Road. The southern boundary is made up of the Barrington River. Only two residences are visible from the property, the closest residence is 300m from the entrance gate.

The property has historically been used as a primitive campground since 1987. Prior to this, it was considered agricultural land.

The site is currently used as a primitive camping ground. The campground is called The Steps Barrington and is managed by Barrington Outdoor Adventure Centre (BOAC). The applicant, as Director of Barrington Outdoor Adventure Centre, has been managing the property since 2009 with approval to operate a primitive camping ground obtained through Gloucester Shire Council in June 2010.

# 1.3 Scope of Report

This report has been prepared to accompany the development application and provides information as required by Schedule 1 of the Environmental Planning and Assessment Regulation 2000. The report addresses matters that are required to be considered by the consent authority under the provisions of Section 4.15 of the Environmental Planning and Assessment Act 1979. This Statement of Environmental Effects provides:

- A description of the site.
- A description of the proposed development.
- A review of the statutory and non-statutory planning instruments applying to the land.
- A review of the environmental impacts of the proposed development using available site information.
- A discussion of the suitability of the site for the development.
- A discussion of how the proposal relates to the public interest.

# 2. Site and Surrounding Locality

# 2.1 Site Details

The site is a primitive campground located adjacent to the Barrington River on Manchester Rd, Bindera. The land is described as Lot 681 DP786066, 535 Manchester Rd, Bindera. The land is zoned RU1 Primary Production.

The property is a 14 hectare rural block with mixed coverage of open grassland, lightly forested terrain (about 10%) and river bank riparian vegetation. The property is a gently sloping block. Its northern boundary and entry gate sits at 200m above sea level. There is a 50m drop in elevation to its southern boundary and the banks of the Barrington River, which sit at 150m above sea level. The property has a main road that is 550 metres long from the top access gate to the river camp ground. Along this road there are five joining roads which lead to various localities on the property including riverside locations, sheds and buildings. Through the open grassland and across the hillside is 3.5km of single track mountain bike trail.

There are currently two sheds on the property and one small dam. These sheds are used for storing equipment and supplies. There are three amenities blocks located on the property. One amenities block contains 4 female toilets, 4 female showers, 2 female sinks, 2 male toilets, 2 male urinals, 4 male showers, 2 male sinks, 1 disabled toilet with shower & sink, plus two outside sinks with taps as wash up areas. The second amenities block is smaller with 3 unisex toilets, 2 unisex showers, 3 unisex sinks. The third amenities block provides 2 unisex toilets and 2 sinks. There is one 3 bedroom holiday cottage on site that sleeps up to 11 people with 2 bathrooms.

The site is shown in Appendix 1 – Site Map.

# 3. The Proposed Development

The proposed application seeks to make alterations and additions within the established camping grounds by:

- Site numbers re-naming the camp sites to reflect current operations. No additional areas are proposed for camping. This is a renaming exercise to alleviate confusion. For example, zones 1A and 1B to be renamed zones 1 and 2.
- Number of people permitted on site increase the number of people permitted on site from 120 campers to 271 people to account for campers, staff, self-contained cottage visitors and day visitors. The bushfire assessment for the site and waste water treatment capacity support this increase in numbers. The Primitive Camping Guidelines state that the maximum number of camp sites is not to exceed an average of two per hectare (that average being calculated over the total area of the Primitive Campground). In the case of The Steps Barrington, this allows for up to 28 sites. The Primitive Camping Guidelines also state that there is no specified minimum or maximum size for a designated camp site and there is no specific limit on the number of tents, campervans or caravans that may be sited in a designated camp site in a Primitive Campground. Though, there are minimum separation requirements that apply. Neither the Primitive Camping Guidelines or Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021 provide guidance or limits on the number of day visitors to the site. As the site is getting more well known, many people are arriving at the site unbooked and it is creating a tourist unfriendly environment when staff must ask visitors to leave as maximum numbers would be exceeded.
- Establishing an onsite administration building to service visitor needs an onsite office is essential to everyday operations such as maintaining a register of persons onsite, a first aid base, visitor information service, and sale of essential and emergency items for visitors. The building will also allow WiFi access for visitors and remote workstations for visitors. This building will also serve as a bushfire refuge for the site and allow a space where visitors can shelter in place in the unlikely event of an emergency where visitors cannot evacuate. The location of this building close to the front gate will allow processing of visitors prior to them entering the main site. It also allows communications with emergency services in an emergency situation as this is the main location where WiFi is available at the site (there is no phone reception).

# 3.1 Site Preparation

The subject site of the administration building is level and free of vegetation. When construction begins, the area will be blocked off to ensure no access to passing visitors and ensure general safety.

#### 3.2 Traffic and Access

The property itself has a main road that is 550 metres from the top access gate to the river camp ground. The road is signposted as a Shared Road with an on-site speed limit of 10km/h. Along this road there are five joining roads.

There is a large day use parking area, suitable for up to 30 cars, located on the entrance driveway prior to the proposed location of the administration building. Day visitors walk from the car park to the office to register. A drive through registration area is provided for campers. Access to the day use car park is via a one-way loop that is separate to camper traffic. Signage is in place to direct day users to this carpark.

All parking for campers at The Steps Barrington is provided on-site. Parking is not required on or adjacent to Manchester Road.

The majority of campers choose to park their vehicles next to their camp however designated parking areas are provided for those that would prefer clear space around their campsite.

For day users wishing to use the river, further parking areas are provided separate to the campsites.

Roads and parking areas are shown in Appendix 1 – Site Map

During construction of the proposed administration building, no additional traffic is expected as construction will take place outside of peak visitor periods, therefore, the day use carpark can be utilised by any additional vehicles.

#### 3.3 Services

The new building and facilities will be connected to the existing services. Power and water are existing. Toilets will be either composting or connected to the wetland treatment system. OSSM approval will be sought when required.

# 3.4 Operational and management details for the proposal

The Steps Operating Manual outlines operations for The Steps Barrington. As a boutique camping ground, the maximum number of campers is currently restricted to 150 campers/day users at any one time. The proposal is to increase this number to 271.

The camping ground maintains a register of persons on site at all times, meaning that visitor numbers are continually monitored.

As the performance of waste water systems can vary with environmental conditions and continual versus peak loads, all wastewater management systems will need to be monitored to ensure that maximum visitor numbers do not exceed wastewater treatment capacity. Wastewater treatment systems require regular inspection to ensure that they are adequately treating the waste water and there is no potential for pollution of the river. The Steps Operating Manual outlines maintenance and inspection schedules for all wastewater treatment systems.

# 4. Planning Controls and Legislation

#### 4.1 Gloucester Local Environmental Plan 2010

The Steps Barrington Property is currently zoned RU1 – Primary Production under the Gloucester Local Environmental Plan 2010. The draft Midcoast Local Environment Plan proposes to change the zoning to RU2 – Rural Landscape. Both of these zonings allow for camping grounds and Tourist and

Visitor Accommodation with consent. Recreation facilities (outdoor) is also permitted and may be more suited to the day use aspect of the property.

The Gloucester LEP states as one of its objectives "to encourage eco-tourism enterprises that minimise any adverse effect on primary industry production and the scenic amenity of the area".

As a well established tourist destination in the region, The Steps Barrington is widely recognised as supporting and promoting the principals of eco-tourism and showcasing the scenic amenity of the area whilst having no impact on the primary industry production around it.

The proposed development application maintains the existing primitive camp ground usage on the land and does not result in any outcomes which would be contrary to the objectives of the RU1 zone.

# 4.2 Gloucester Development Control Plan 2010

Section 4.3 of the Gloucester Development Control Plan outlines the Tourism Development Guidelines.

There is a strong demand in the Gloucester regions for not just camping but also day destinations and activities. The proposed administration building is intended to serve multiple purposes to meet the requirements of the modern tourist. An administration hub to ensure the smooth running of the day to day activities and processing of visitors. An information centre for visitors, to supply information on the activities and amenities available on site and also in the surrounding region. Retail sales of items important to visitors including camping items, mountain biking parts, snacks and drinks. A first aid hub. Equipment hire location including river sleds and safety equipment, mountain bikes, mountain biking helmets and armour. A work from holiday space where visitors can access WiFi to manage work commitments while away. And, a bushfire refuge in the event such is needed. As there is no phone reception on the property, a central hub where WiFi is available and visitors can access emergency services warning information is highly desirable to most visitors.

Section 5.1 defines that Tourist development will be limited by site functional factors such as access, parking and setbacks. Sufficient parking is currently available on site to accommodate the proposed increase in numbers. Of the 271 people proposed, 150 people will be camping and their parking supplied on the camp site. 11 people are in the self-contained accommodation with parking supplied at the accommodation. 10 people are staff with parking supplied at the work shed and work yards. 100 people are day visitors. Accounting for 2 people per vehicle (minimum), 50 parking places are required. The main day use car park holds 30 vehicles, the river car parks holds 6 and 4 vehicles respectively and the camp ground visitor car park holds 10 vehicles. An overflow car park is also available off the work yard access road if required.

Access to the premises is via Manchester Rd. This is an all-weather unsealed road. It is not expected that the increase in visitor numbers will have a significant impact on traffic rates as the additional vehicles will be spread out over the day. Day visitors arrive at the site in the morning and depart in the late afternoon. Camping visitors arrive anytime between 12 pm and 10 pm with the bulk either arriving 12pm-1pm or 6pm-8pm and depart generally 10am-12pm. This results in an traffic being spread out over the course of the day.

Section 5.3 of the DCP requires that any buildings be a minimum of 75m from the main road. The proposed administration building meets this requirement.

With reference to section 5.4, the administration building will meet any requirements of the Building Code of Australia and solar passive design.

The landscaping of the building will be dictated by the bushfire requirements of the building as a refuge. Existing native vegetation will be maintained to meet APZ requirements.

# 4.3 Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds, and Moveable Dwellings) Regulation 2021

Part 4, Subdivision 9 of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds, and Moveable Dwellings) Regulation 2021 outlines the requirements for Primitive Camping Grounds in terms of density and amenities. All of the requirements are met by this proposal. No mention is made of day visitors to a Primitive Camping Ground in this regulation or the Caravan parks and camping grounds Planning Circular 2021 or Regulation of camping density in primitive camping grounds Planning Circular 2006.

If the same density requirements were applied to The Steps Barrington as for campers, the size of the property would allow for a maximum of 28 campsites. Given that a maximum of 12 people may occupy a campsite, it could reasonably be assumed that a maximum occupancy of the site as a whole could be 336 people excluding staff (who are not mentioned in the density requirements). Therefore, the increase in maximum numbers to 271 to allow for day visitors and provide a welcoming tourism environment would seem to meet these requirements.

# 4.4 Midcoast Destination Management Plan 2024-2030

The proposal is well supported by the Midcoast Destination Management Plan 2024-2030. The DMP states as a priority for future development, "encouraging the growth of experiences that provide different ways for different audiences to engage with and access nature (in all its forms)." The DMP recognises camping as a strength of the Barrington Coast region.

One of the goals of the DMP is to encourage extended stays and encourage repeat visitation. One of the main reasons that visitors access The Steps for day visits is to preview the property for future camping experiences, allowing a welcoming environment encourages repeat visitation.

The construction of the administration building supports the notion that "more flexible working arrangements means people are looking to escape for longer short breaks. The closer to home that they can achieve a sense of freedom yet still be connected (for at least some part of their trip) is likely to continue strengthening the appeal of destinations such as the Barrington Coast."

The Active Family and Millennial and Gen Z demographics are core visitors to The Steps Barrington as it provides "opportunities to experience the great outdoors and self-select a break from screen time by providing a fun and exciting alternative. The Steps provides a "sustainable, nature-based destination that offer a variety of accommodation."

Cycle tourism and the mountain bike market segments are also recognised as a valuable opportunity in the DMP. "There is an increasing interest throughout Australia in opportunities for cycle tourism. The Steps Barrington and Barrington Bike Park are more likely to attract the mountain bike enthusiast segment, who will travel for the primary purpose of a mountain bike experience" in addition to recreational cyclists.

The DMP has a strong focus on growing the Ecotourism credentials of the region. The Steps Barrington has recently been awarded a grant by MidCoast Council to apply for Ecotourism

Accreditation in order to formalise the existing commitment to the environment and sustainable tourism.

# 5. Environmental Impacts

The proposed development does not result in significant change to the site's environmental landscape. The site of modifications is existing, highly disturbed land and doesn't contain any significant environmental constraints. Relevant matters are discussed below.

# 5.1 Context and Setting

The proposed development will not significantly impact the external presentation to public areas or adjoining lands. The proposed development cannot be seen from the road. The proposed alterations and additions are unlikely to have a significant impact on the surrounding environment or river areas due to the minor change proposed across the property. Setbacks to areas outside the property remain unchanged. Entry to and from the property also remain unchanged as part of the proposal.

#### 5.2 Traffic and Access

The proposal will potentially lead to increased traffic flows on Manchester Road on occasions where visitor numbers exceed their current levels.

As a primitive campground, the site has been accommodating up to 150 people in peak holiday periods such as long weekends and school holidays all of whom arrive by vehicle. These numbers are much less than the site is physically capable of servicing but they are kept at this level to purposefully provide a boutique, natural, exclusive camping experience that offers families and groups ample space and amenity. At present, on average, the site sees 1 vehicle per 2-3 persons booked. The majority of vehicles are cars, ranging in size from small cars to SUVs and 4WDs. Although primarily a tent-based camping experience some visitors do bring caravans, camper trailers, trailers and motor homes. Campground check in times are from 12 noon and check out times are prior to 12 noon. The nature of camping is that guests arrive over a period of 10 hours and depart over 6 hours so any traffic is well spread even if all guests are arriving and departing on the same day.

Day visitors generally arrive between 8am and 10am and depart between 3pm and 5pm.

In addition to The Steps Barrington traffic Manchester Road services 10 private residences and 2 holiday rental houses.

All campers are advised that the access road is narrow, of formed gravel, to be aware of livestock on the road and that caution should be taken and speeds slowed to respect the condition of the road and to minimise impact on other users.

Under the proposal, however, it is envisaged that the amount of traffic accessing the site could increase at certain peak times though the percentage increase would be minimal when spread out over the course of a day.

# 5.3 Flooding, Drainage and Erosion

Parts of the property are subject to flooding in times of high rainfall, including areas planned for primitive camping. Campzones 1 & 2 (see site map) are inundated in floods that exceed 2m at the Forbesdale automated gauge on the Barrington River. The main camping flat is not inundated in floods that measure up to 5.8m at the Forbesdale automated gauge on the Barrington River (19 March 2021 flood data, flood level 5.8m, www.realtimedata.waternsw.com.au). The flood level that

does inundate the main camping flat is expected to be approximately 6m, however it is known that there has only been 1 event since 1945 (when records began) that has exceeded 5.8m.

The park possesses an existing evacuation plan which has been prepared to facilitate the evacuation of guests, residents and staff within the park when a flood event is predicted.

In the event of a potential flood, campers are moved to areas that are out of the flood risk zone or camping cancelled if necessary. The Steps Operating Manual outlines the steps to be taken in the event of a potential or actual flood to ensure campers are calmly and safely removed from the site without presenting a traffic risk to others in the area. Part of any evacuation process includes a complete survey of the area to ensure any rubbish is removed to prevent it potentially entering the waterway. A register of all occupants on site is held by BOAC and is used to ensure all campers are accounted for in the event of a flood evacuation.

Campers use existing sites that are well-grassed with established vegetation. The applicant has undertaken extensive land regeneration since 2010 to assist in stabilising land and riparian areas. An irrigation system is in place for all grassed areas prone to degradation from overuse. Any degraded areas will be rested and excluded from use until they are considered stable and rehabilitated.

The proposed administration building is well out of the flood zone. The proposed development makes little change to the drainage of the land. Storm water drains will direct water from the building area across the road and into the vegetated area to be dispersed across a large surface area. This will prevent any potential flooding of the building or roads and prevent erosion.

# 5.4 Vegetation

The previously disturbed land that is proposed for this application would have no biodiversity impact and will be unlikely to a have significant impact on any threatened species or endangered ecological community listed under the State (BC Act) of Federal (EPBC Act) legislation.

# 5.5 Heritage

There are no items of Aboriginal or European heritage listed as being present on the land and the site is not located in a heritage conservation area.

#### 5.6 Bushfire

The property is identified as bushfire prone land. The Steps Barrington campground has a bushfire management plan in place, developed in conjunction with the local RFS. A register of all occupants on site is held by The Steps Barrington and used to ensure all campers are accounted for in the event of a bushfire evacuation.

There have been two bushfires close to The Steps Barrington since BOAC has managed the property (one on the southern ridge and one on the northern ridge). In both cases the campground was evacuated in a timely and orderly manner. Management closed the campground for a short period in 2019 due to heightened bush fire risk.

There are 2 x 20,000L water tanks on the property that are dedicated to fire fighting with 65mm Storz valves accessible to emergency services. BOAC has a dedicated fire fighting trailer on site with IBC, hose reel and pump. The Barrington River is a reliable water source in this context. In 2020, when the Barrington River had technically stopped flowing, all water holes at The Steps Barrington were still full and the river was still trickling throughout the property.

There are fire extinguishers located on-site for spot fires which are regularly tested.

A bushfire assessment report is attached to this application.

# 5.7 Weather/Storm events

The possibility for severe weather such as lightning, high winds, extreme heat and heavy precipitation exists at any time at The Steps Barrington. As part of its standard operating resources BOAC has a severe weather policy. The overall intention of the severe weather policy is to remove the likelihood of any person being at risk of tree fall in severe weather conditions. Altered activity and altered locations for temporary structures or campsites may need to be considered given the effects of severe weather. In the event of a Severe Weather Warning being issued in the area, The Steps Barrington will discuss possible options with campers in determining the risk factor of the location. In the event of a potential severe storm/weather event, campers will be moved to areas that are out of any tree fall risk zone or camping will be cancelled if necessary.

#### 5.8 Noise

The proposal for increased occupation of The Steps Barrington could potentially result in an increase in noise. Generally, the noise levels of campers is self-monitored by other campers i.e. if the noise is excessive then other campers will ask them to turn it off/down or will alert management to the annoyance. However, if the camping grounds are booked for a single group then this may not be the case. Therefore, The Steps Barrington requires that music be limited to 5 dB above background noise 30m from any occupied residence in the area. Campers are required to agree to this condition on booking. Management has a noise monitoring device that can be used to check noise levels at any time. The Steps Barrington will provide a staff member on site overnight when the campground is exclusively booked to monitor noise levels and behaviour in general.

# 5.9 Amenity & Setbacks

Based on the visual characteristics of the surrounding area, the aesthetic impact of the proposal will be minimal and in line with current usage. No additional areas will be utilised for camping than those currently being used. The natural topography of the block prevents visual impact on the majority of surrounding properties. The nearest residence in line of sight, which is 800m to the north east currently has a restricted view of the camping flat, however vegetation screens ensure that this view is minimal. All setback requirements of the Gloucester Shite Council Development Plan 2010 are met.

# 5.10 Sewage

An upgrade to the existing wastewater treatment system and construction of a composting toilet block has been approved by Midcoast Council. The reed bed system will cater for 320 people and the composting toilet system caters for an additional 30 guests.

The amenities will provide a ratio of 1 toilet/urinal per less than 20 persons on site at peak capacity of 217. No ratio of toilets to campers is provided for in the primitive camping guidelines, however, the more stringent Caravan Park and Camping Grounds require 6 toilets/urinals per 25 sites. One site can accommodate up to 12 people, resulting in a ratio of 1 toilet/urinal per 50 persons. (Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005)

#### 5.11 Drinking Water

The Steps Barrington has a lodged and approved QAP for the property. Drinking water is tested 3 monthly for E-Coli and annually for a broad range of contaminants. Potable water is supplied to campers at the amenities block and at the self-contained accommodation.

# 5.12 Rubbish

Rubbish and recycling bins are supplied in and around each campsite at a ratio of 1 rubbish and 1 recycling bin to 20 people at present although trends are seeing campers producing less waste so this may be revised into the future. Bins are emptied daily during busy times and as required during quiet times. Rubbish and recycling bins are provided in the day users car park and also at the checkin/check-out point.

All rubbish and recycling bins are taken to Gloucester waste and recycling centre. Additional bins are placed on-site while full bins are being emptied.

#### 5.13 Flora and Fauna

The property is a 14 hectare rural block with mixed coverage of open grassland, lightly forested terrain (about 10%) and river bank riparian vegetation. It has a long history of human occupation and disturbance. There are no known endangered, vulnerable or at risk flora or fauna on the property.

# 6. Suitability of the Site

The site is currently approved and used as a camping ground, self-contained accommodation and education facility. As the site becomes more popular, larger numbers are being seen at the site. Increasing the overall numbers and re-organising the camping sites will ensure guest needs are better serviced and a quality experience is had buy all. The administration building is located at the entrance to the grounds allowing guests to be processed efficiently and providing them with better access to services. The proposed location of the administration building is suitable as it will allow guests to easily access on arrival, parking is available close by and day visitors can effectively be separated from overnight visitors.

#### 7. Public Interest

The proposed alterations enhance the attractiveness of The Steps Barrington to a wide range of visitors to the region. Many day visitors are currently being turned away due to occupancy restrictions. From a tourism perspective, this is undesirable as visitors have driven a minimum of 25 minutes to visit only to be asked to leave. An increase in maximum number is required, in order to support the goals of the Midcoast Destination Management Plan 2024-2030.

By supplying a Bushfire Refuge where guests can be gathered in one defendable location with access to emergency services instructions, stress on local firefighters in reduced. Evacuation traffic can be managed more effectively and up to date messages can be received in real time.

# 8. Conclusion

The development is proposed on land known as Lot 681, DP786066, 535 Manchester Rd, Bindera. The site is an existing primitive camping ground, self-contained accommodation and education facility adjacent to the Barrington River. The proposed development involves increasing the maximum occupancy of the site, reallocating the camping sites and construction of an administration building. The proposed development is permissible on the land with consent under the provisions of the Gloucester Local Environment Plan 2010. The proposal is consistent with the relevant development standards and clauses under the LEP. The proposal has also been assessed against the requirements of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021 and its relevant Planning Circulars.

The subject land is a suitable site for the proposed development and is not subject to constraints that would restrict this form of development. The proposal does not result in any significant environmental impacts and buildings will be constructed in accordance with the Australian standards. The proposed development will provide for improvement of tourism resources in the region and the approval of the proposal is in the public interest.

Appendix 1 – Site Map

