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14<sup>th</sup> March 2024

The General Manager

Tenterfield Shire Council

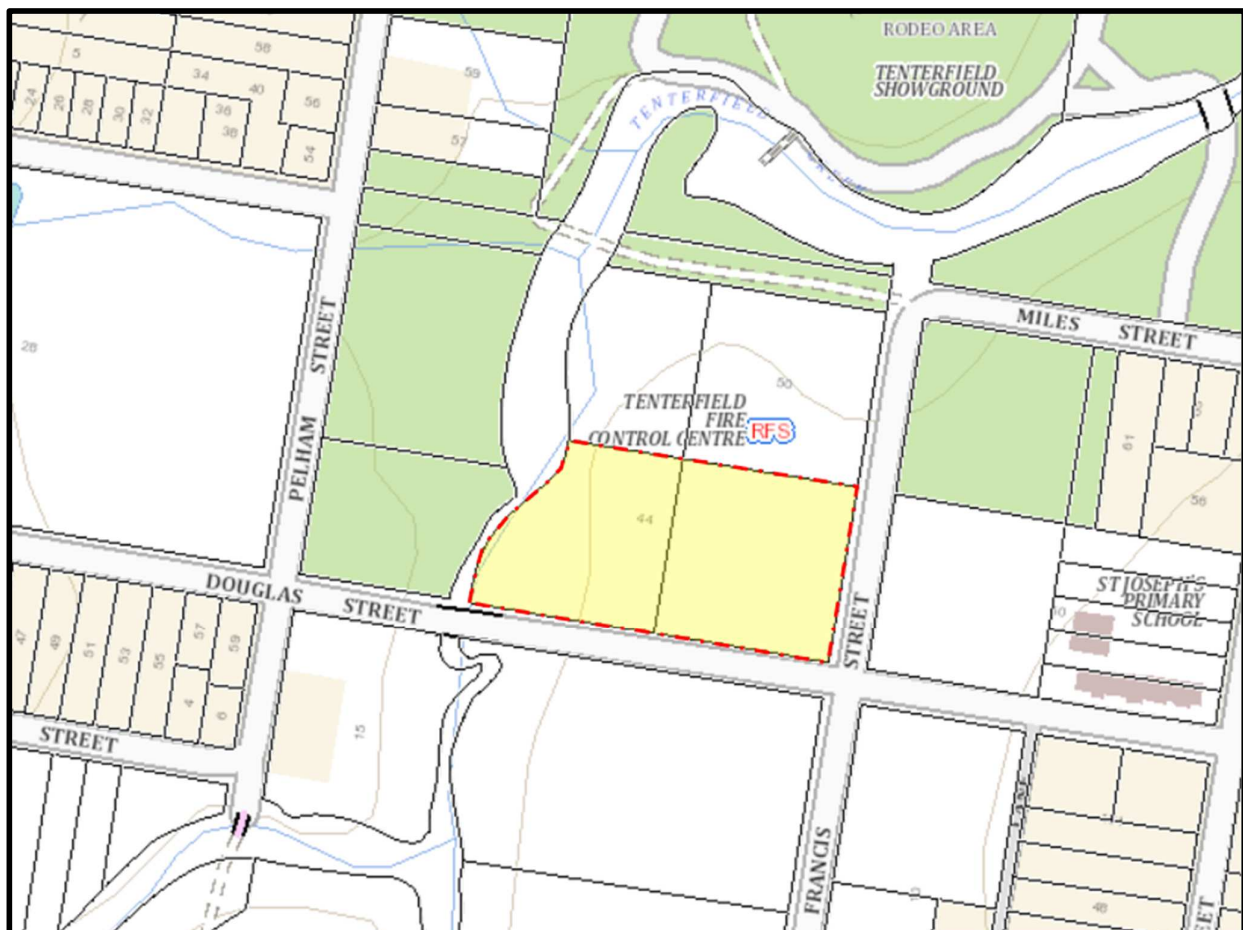
PO BOX 214

TENTERFIELD NSW 2372

### Statement of Environmental Effects

#### Proposed Recreation Vehicle (Caravan) Park

lot 2 & 3 Sec 37 DP 758959 – Francis & Douglas St, Tenterfield



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## **1. INTRODUCTION**

This report has been prepared by Casson Planning & Development Services to support the development application by the Campervan & Motorhomes Club of Australia (CMCA) to establish a Recreation Vehicle (RV) Park (caravan park) on land owned by Tenterfield Shire Council – part lots 2 & 3 Sec 37 D 758959, Francis and Douglas St, Tenterfield.

Also located on lot 2 Sec 37 DP 758959 is the Tenterfield Transport Museum (TTM) who have a lease. The Committee of the TTM have a lease over the land included in this application and, in fact made representations to the CMCA to establish the RV Park and provide an area that would potentially attract further visitation to the Museum (and Tenterfield regions), from visiting motor homes.

Short term occupation of the CMCA RV Park would be limited to members of the Club (or visitors subject to the same Club requirements) and available to self-contained recreation vehicles (motorhomes and caravans) only.

The CMCA would undertake the following work on the site:

- 8m gated entrance with cross over
- 14m length sites x 8m wide (approximately 25 based on available area)
- 6m wide driveway – 130m long
- Park dump point
- Water points
- Fire hose reel
- Power and water to Custodian Site
- Barbecue shelter with concrete pad 9m x 6m
- Storage/garden shed

The intention of CMCA is to sublease the relevant area from the TTM – with council approval.

Note that a section 68 application will be lodged as well with council in respect of this proposal. There are a number of objections in accordance with Section 82 of the Local Government Act, 1993 that will be lodged, due to the circumstances of the application. Please refer to document attached to this report.

## **2. DETAILS OF LAND**

### **2.1 Title and Existing Uses**

Description:	Lots 2 & 3 Sec 37 DP 758959, Francis and Douglas St Tenterfield.
Owners:	Tenterfield Shire Council
Area	Approx 1.89ha (total, including area used by Transport Museum)



Figure 1 Subject Land - SIX Maps



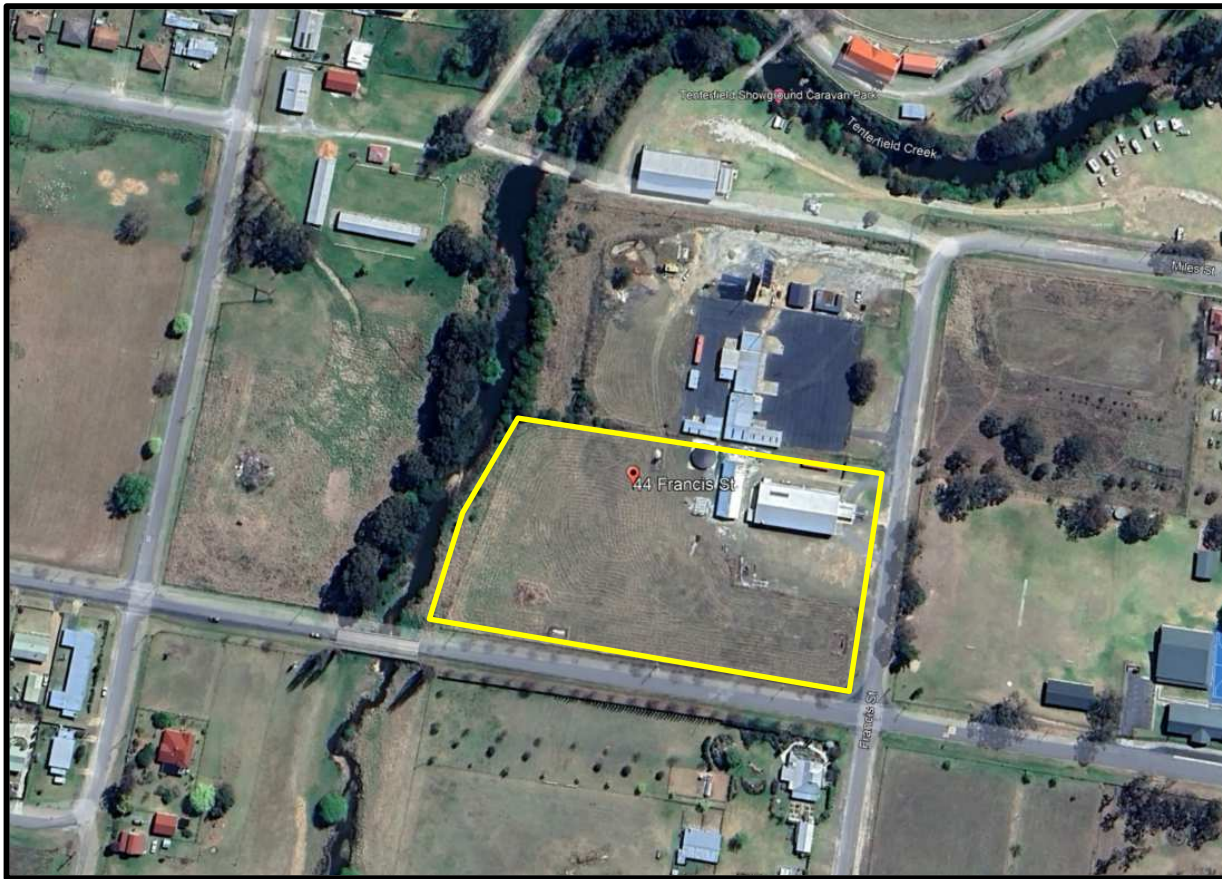


Figure 2 Image from Google Earth - Sept 2023 (indicative boundary only)

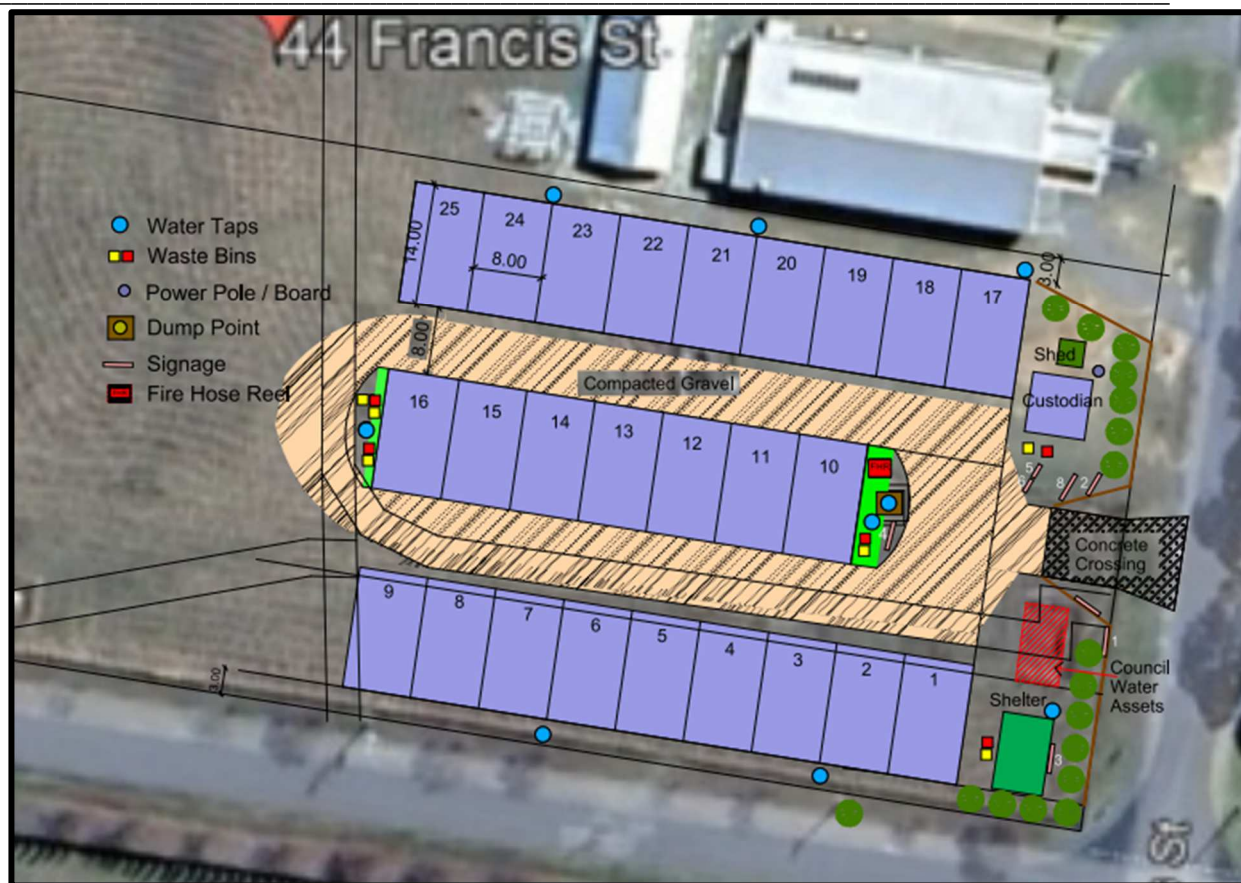


Figure 3 Proposed Site Layout

### 3. MATTERS FOR CONSIDERATION

3.1 Section 4.15(1)(A)(i) – any environmental planning instruments

#### Tenterfield Local Environmental Plan 2013 (TLEP)

The Tenterfield LEP 2013 is the relevant environmental planning instrument as shown in figure 2 below.



Figure 4 Planning Portal Report

## Zone RU5 Village

### 1 Objectives of zone

- To provide for a range of land uses, services and facilities that are associated with a rural village.
- To enable development of a scale that is compatible with the general residential character of village areas and that will not prejudice the viability of established shopping and commercial centres.

### 2 Permitted without consent

Building identification signs; Environmental protection works; Home occupations; Roads; Water reticulation systems



### **3 Permitted with consent**

*Centre-based child care facilities; Community facilities; Dwelling houses; Liquid fuel depots; Neighbourhood shops; Oyster aquaculture; Places of public worship; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Respite day care centres; Schools; Tank-based aquaculture; Any other development not specified in item 2 or 4*

### **4 Prohibited**

*Agriculture; Air transport facilities; Airstrips; Cellar door premises; Correctional centres; Crematoria; Eco-tourist facilities; Farm buildings; Farm stay accommodation; Forestry; Heavy industrial storage establishments; Heavy industries; Resource recovery facilities; Roadside stalls; Rural workers' dwellings; Waste disposal facilities; Wharf or boating facilities*

The application seeks approval for an RV park which is essentially a caravan park which is defined in the TLEP as

**caravan park** means an area of land, with access to communal amenities, used for the installation or placement of caravans, or caravans and other moveable dwellings, but does not include farm stay accommodation.

#### *Clause 2.3 – Zone objectives and land use table*

The use of the land as a RV / Caravan - park is considered to be consistent with the zone objectives of RU5 shown above.

A caravan park is not specified in item 2 or 4 in the zone table and is therefore permissible with consent.

#### *Clause 5.21 – Flood planning*

The image below is from the Tenterfield Floodplain Risk Management Study and Plan Study – 2014 and shows risk categories.

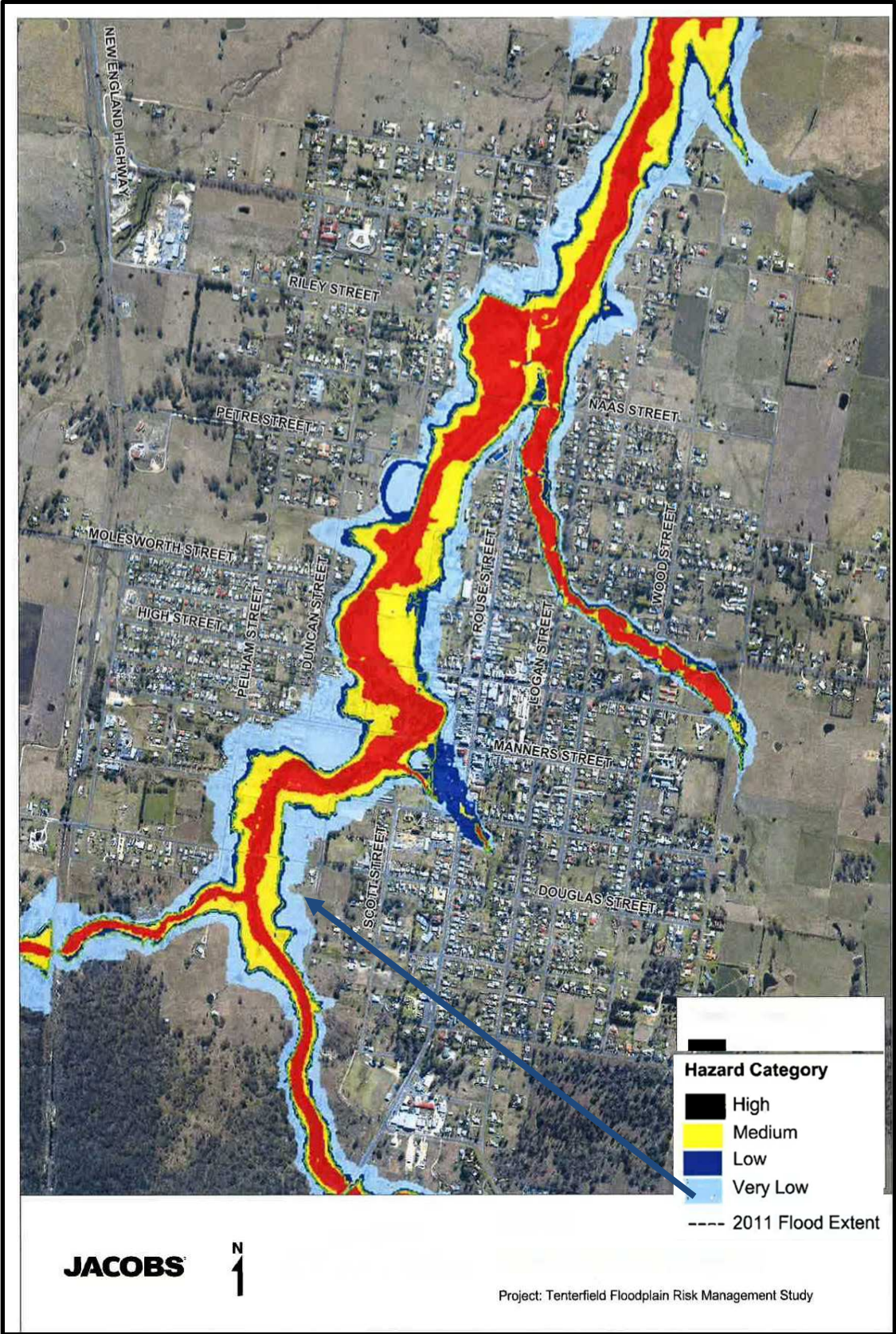


Figure 5 Extract - Tenterfield Floodplain Risk Management Study and Plan - 2014



The following image shows the subject land. Most of the area nominated for use as the camping ground has no flood hazard categorisation and the balance of the land is shown as very low risk. Given that the use of the land is for short term accommodation and all vehicles can be moved very quickly should any sort of emergency require such action, it is suggested that flooding is not a concern for the proposed development.



Figure 6 Subject land - very low hazard category

<b>Tenterfield Local Environmental Plan 2013</b>		
<b>Part 1 - Preliminary</b>		
1.9A	Suspension of covenants, agreements or instruments	Nil
<b>Part 2 – Permitted or Prohibited Development</b>		
What is the land zoned?		RU5 Village
What is the proposal for?		RV / Caravan park
Is this permissible within the zone?		Yes .
Does it meet the objectives of the zone?		Yes
<b>Part 4 – Principal Development Standards</b>		
4.1	Min subdivision size	Not applicable.
<b>Part 5 and 6 Miscellaneous and Additional local provisions</b>		
5.10	Heritage conservation	The site is not listed as an item of local heritage significance or within a Heritage Conservation Area.
5.11	Bush fire hazard reduction	The subject land has bushfire prone land classified as vegetation buffer. A Bushfire Assessment Report has been prepared and is attached to this submission.
6.1	Earthworks	The application seeks approval for establishment of sites for parking, access road and minor construction. There is minimal earthworks required.
6.4	Essential Services	Existing services are available and can be utilised on the subject land – power, water and sewerage.

### 3.2 Section 4.15(1)(A)(ii) – any draft environmental planning instruments

There are no known draft environmental planning instruments which affect the subject land.

**3.3 Section 4.15(1)(A)(iii) – any development control plan(s)**

A review of the Tenterfield Shire Council Development Control Plan indicated limited reference to caravan parks.

Caravan Parks are only referred to with general reference in Chapter 8 - Signage and Outdoor Advertising.

Elsewhere in:

- Chapter 1 – General Provisions, where they fall within the definition of residential development, but not within the definition of residential accommodation,
- Chapter 2 – Notification Procedures – with such applications to be notified and advertised.

**3.4 Section 4.15(1)(A)(iia) – any planning agreement or draft planning agreement**

Not applicable.

**3.5 Section 4.15(1)(B) - the likely impacts of the development**

The proposal is compatible with other adjoining activities and land users.

The proposal and operation will not have a negative impact on the local context or setting.

**3.6 Section 4.15(1)(C) - the suitability of the site**

The proposal will not increase the demand for public services or facilities.

The site is suitable for the proposed development of short term accommodation for fully self-contained recreation vehicles.

It is considered that the proposal will have no significant detrimental effect relating to environmental, social or economic impacts on the locality. Further consideration is given to the potential impacts of the development in this submission.

**3.7 Section 4.15(1)(D) - any submission made**

The application is yet to be advertised. The proponent will be happy to respond, if considered appropriate, to submissions if received.

**3.8 Section 4.15(1)(E) - the public interest**

The proposal is not contrary to the public interest. On the contrary, it is considered likely to create a positive interest as it will attract a section of the travelling



community for short term accommodation which undoubtedly translates to benefits to local business.

#### 4.0 LOCALITY SKETCH

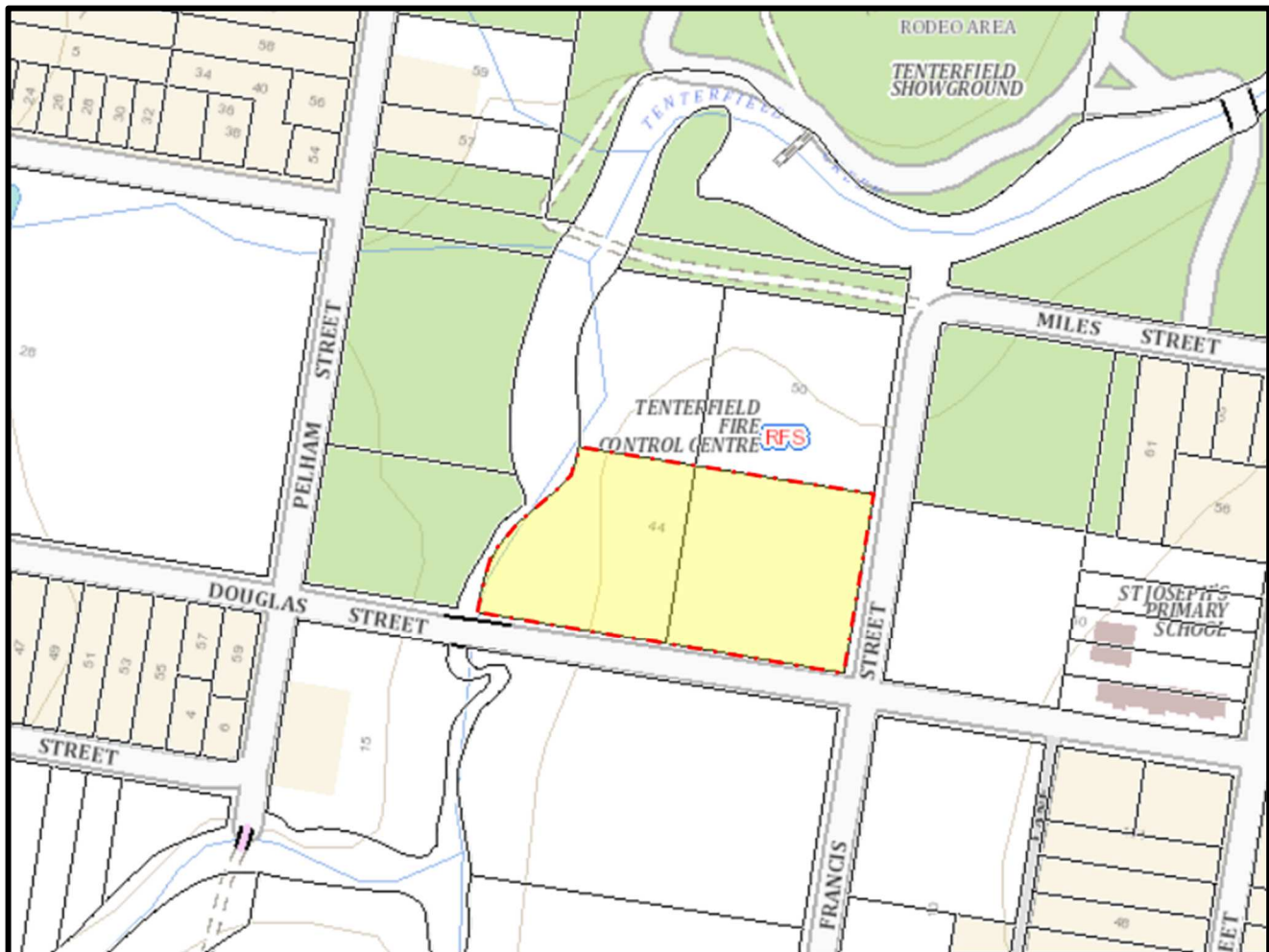


Figure 7 Locality Map (Source SIX Maps 2024)

Other points under this plan will be discussed within the Statement of Environmental Effects.

### 5.0 STATEMENT OF ENVIRONMENTAL EFFECTS

#### 5.1 Flooding, Drainage, Landslip and Soil Erosion

The land is subject to flooding, however as stated previously in this submission, it is suggested that the level and location of flooding on the site will not impact on the development as proposed. CMCA will however develop a site specific Emergency Management Plan which covers a range of scenarios including:

- Flooding events,
- Bushfire
- Vehicle fire and
- Medical situations.

CMCA Custodians are charged with enacting any emergency procedures within the RV park. As a general (not necessarily site specific) guide, if a pending flood event will impact any of the RV Park, vehicles that may be impacted by the flood event will be relocated within the park, or to higher ground outside the park precinct if required.

The RV park can be closed during emergency situations and reopened once the emergency has passed

Council requirements will be met with adequate regard to erosion and sedimentation control on the site, during the site establishment process.

## **5.2 Bushfire Risk**

The subject land is affected by bushfire vegetation. The use of the land falls into the definition of a Special Fire Protection Purpose and a copy of the Bush Fire Assessment Report, prepared by Statewide Bushfire Consulting is attached to this submission.

Importantly, the report concludes that

*The proposal can meet the requirements for the specific objectives of Subdivision development (Section 4) by compliance with the acceptable or performance solutions for all Bush fire protection measures within 'Planning for Bush Fire Protection 2019' (p19)*

*In accordance with the recommendations described by this report, this assessment concludes that the proposed facility can comply with the requirements for the specific objectives of SFPP development by compliance with all acceptable solutions within 'Planning for Bush Fire Protection 2019' relevant to the development under Section 100B of the NSW Rural Fires Act (p20)*

## **5.3 Flora and Fauna**

There will be no clearing of the land which would impact on flora and fauna.

There are no concerns in respect of impacts on either flora or fauna.

## **5.4 Lot Shape and Size**

There are no concerns regarding lot shape and size for the proposed development.

## **5.5 Impact on adjacent properties**

The proposed development will not result in any adverse impacts on any existing uses on adjacent properties.

On the contrary, the proposed development will likely have positive impacts on the adjoining Transport Museum with increased patronage considered likely from RV park ‘users’.

## **5.6 Impact on existing and future amenity of the locality**

There will be no adverse impact attributable to the use of the land by recreation vehicles for short term accommodation. The vehicles are fully self-contained and allow for a low key style of living or holidays. The occupants of the RV vans are generally in the ‘older’ age categories and the proposed use is very unlikely to have any adverse impact on amenity in the locality.

### **5.6.1 External Lighting**

The only lighting provided will be undercover lighting to the shelter structure. This will be directed away from any neighbouring properties.

### **5.6.2 Signage**

The proposed signage is provided below. Signs will be either attached to the boundary fence or installed on their own posts. No signs will be illuminated.

The park requires signage to inform park guests of rules or entry, operation, and other important information. Signage is also included at the wastewater dump point, potable water taps and caretaker site. Park identification sign and a CMCA promotional sign is also included. These signs are attached to or behind the entrance fence as the examples show below.

The RV Park sign will be attached to the timber rails, the CMCA ‘Join Now’ sign will be free standing on posts, as will the rules of the park and self- containment signs. All signs are non-reflective and will not be illuminated. A tourism sign will also be installed under the shelter structure to inform park guests of local attractions and services.

The identification numbers for the signs can be located on the site plan and are shown below.



Figure 8 Proposed Signage

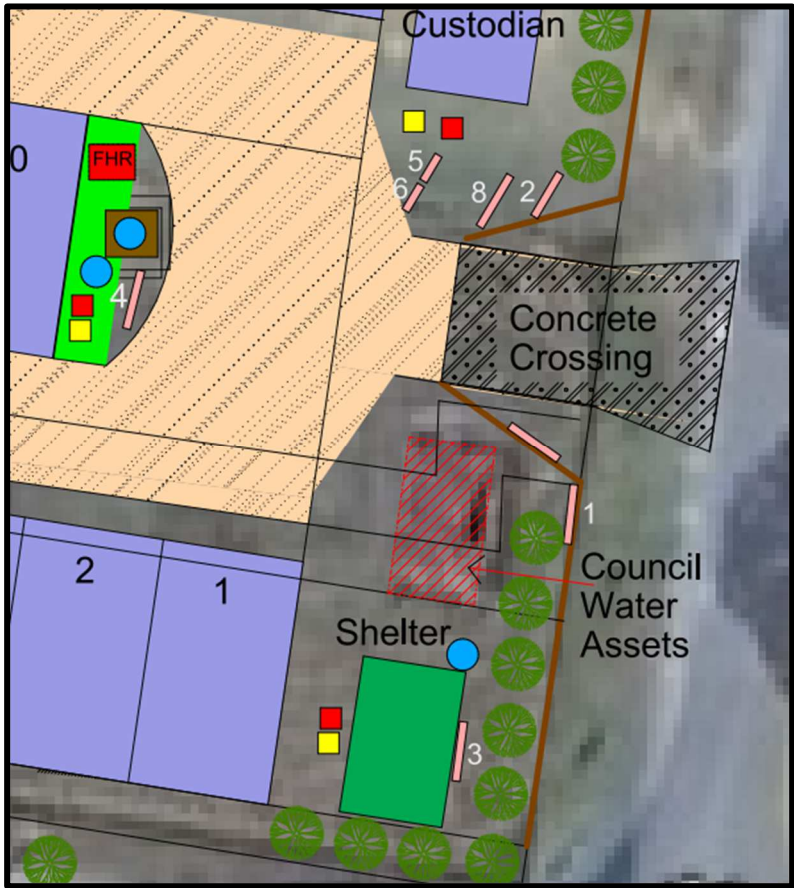


Figure 9 Signage location

### 5.6.3 Structures

There will be limited structures on site – restricted to a shelter for park visitors, and a 3m x 3m utilities shed for the custodians use, as shown on the site plans.

The 9m x 6m shelter is a steel frame with colorbond roof as indicated below.

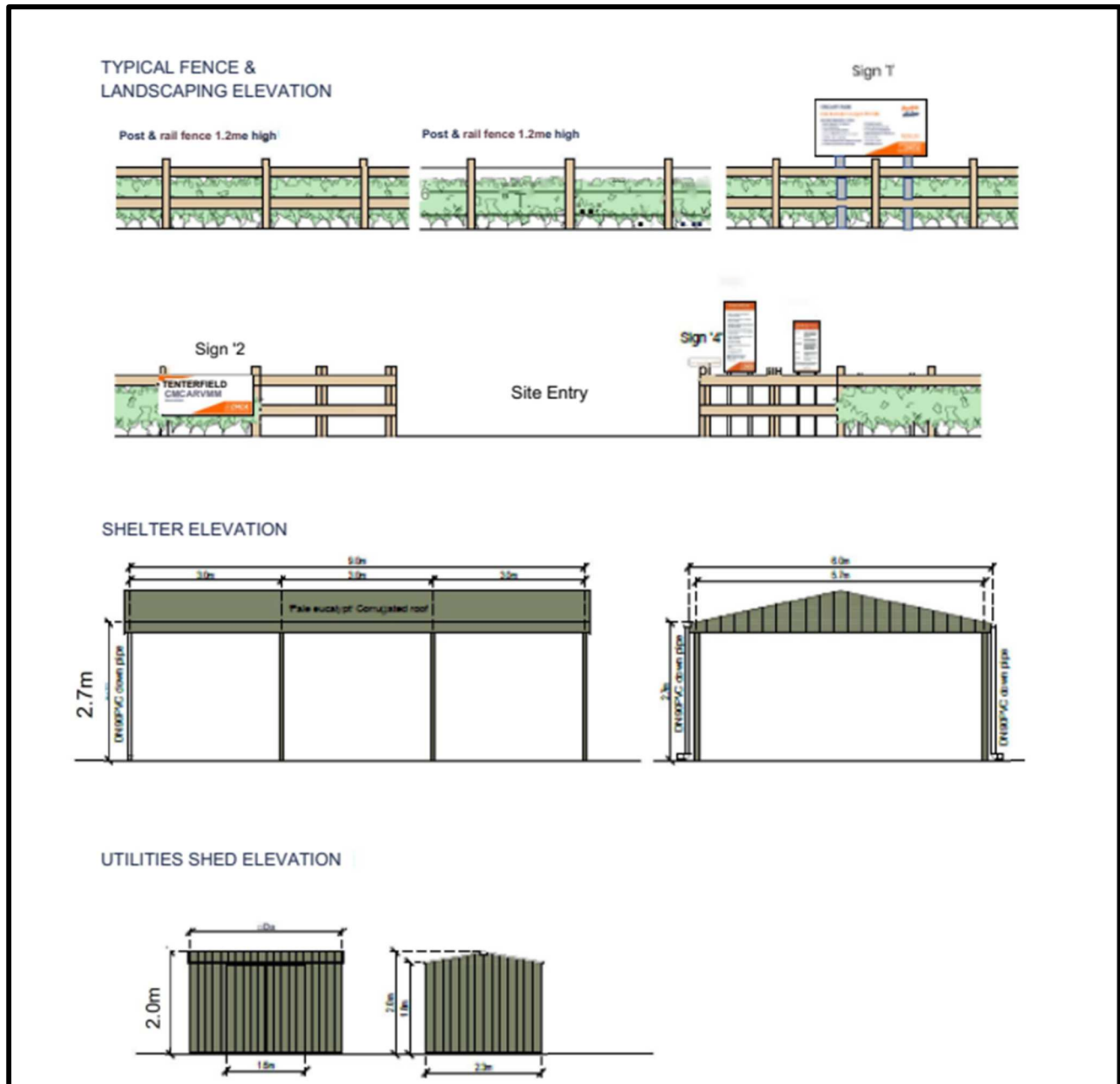


Figure 10 Typical Fence, signage and Landscaping Elevations



#### **5.6.4 Landscaping**

Landscaping will consist of tree plantings of species that are both frost and drought tolerant. They will be planted in accordance with the site plan. Species selection will be determined in consultation with local nurseries and designed to provide visual screening when mature.

Existing fencing will be retained, and the entranceway fencing will be replaced with timber post and rail to improve the park entrance visibility and aesthetics.

### **5.7 Traffic Considerations**

#### **5.7.1 Traffic Generation**

The development will have minimal effect on the traffic in the area with all road infrastructure already in place. While there are 25 sites provided – traditionally, the parks are rarely occupied to more than 50% of the capacity. There will be times when occupation may be minimal due to the time of the year and / or adverse weather conditions.

On the basis that the RV or motorhome is the primary travelling vehicle for the visitor/s, experienced indicates that in a short stay on the site, that there might be 2 traffic movements per day for expected tourism-based exploring through the sub region etc. On that basis, it is estimated that the maximum number of traffic movements would be (a complete check out of all vehicles) 50 vehicle movements per day. The likelihood of this happening on any sort of regular basis is low, as there will be peak, shoulder and low seasons throughout the year, where traffic movements from the site will be very minimal in comparison to the possible maximum movements.

Further consideration is that a number of RV enthusiasts utilise bicycles or walking, once they have located in the RV park, thereby further reducing potential vehicle movements to and from the site.

#### **5.7.2 Road Network**

There are no concerns regarding the existing standard of the road network.

#### **5.7.3 Parking**

The site provides for up to 25 sites with one allocated for the onsite custodian...

No parking spaces are provided within the park for the following reasons:

- No delivery vehicles are expected
- No guests are allowed at the park other than those booked in to stay in their own vehicles
- All tow vehicles must be parked within the allocated site
- The caretaker has their own site for an RV and tow vehicle

Any 'need' for overflow parking is considered unlikely – however the site is capable of providing space for additional vehicles (if all sites are occupied), should it be required.

#### **5.7.4 Road Works Engineering Design**

A new concrete access crossing is proposed for this development from the front boundary to the edge of the bitumen seal, as shown on the plans. A separate application under s138 will be submitted in this regard. Internally there is a gravel access road which provides adequate access to all the sites.

The crossover from Francis Street will be constructed as per the Standard Drawings for residential driveways with a width and load bearing capacity to suit larger RVs.

Access to and from the park will be via a double gated entrance of approximately 8m width to facilitate the two-way movement of vehicles at the entrance.

Francis Street is sufficiently wide enough to enable traffic to turn into the property whilst not obstructing through traffic. The development is within the town 50km/hr speed limit. Sight lines are unrestricted in both directions from the entranceway and traffic speeds are low

### **5.8 Methods of Sewerage Effluent Disposal**

Council's sewerage reticulation system is available to the land. The only connection however will be a dump point for the fully self-contained vehicles.

### **5.9 Availability of Utility Services, Power, Telephone, Water, Sewer**

All utility services are available to the development.

### **5.10 Social and Economic Effects**

This proposal will provide additional options for short term accommodation for fully self-contained recreation vehicles. The primary users of the facility will be members of the Campervan and Motorhome Club of Australia. The site will be promoted to members accordingly.

The attraction of the park will result in additional visitation to the locality from members, who will stay for an average, (based on statistics from the CMCA), of 2.5 nights.

Such short-term visitation will generate direct economic benefit with additional revenue going into the local community in areas such as

- grocery stores,
- petrol stations,
- registered clubs
- tourist attractions, including the Tenterfield Transport Museum, etc.

Based on a comparable, operational, RV park at Gunnedah, it is expected that guests will spend an average \$150 per RV per night. If a conservative average occupancy rate of 12% was assumed – the direct economic impact from the visitation of the recreation vehicles could be in the vicinity of \$160k - \$200k per annum. Note that it is expected that the occupancy rate could be higher given the advantage of being on the New England Highway.

### **5.11 Anticipated Impact of Noise Levels to the site and the locality**

The development will not create adverse noise levels to the site or locality.

### **5.12 Archaeological/Heritage Items**

There are no known Archaeological or European heritage items of significance in proximity.

## **6 CONCLUSION**

In support of this application, we highlight the following points covered within this report:

- The development will provide a range of benefits to the travelling community, as well as the local business community
- The site is suited to the development and there are no objections from the Tenterfield Transport Museum located in close proximity.
- There are no foreseeable adverse impacts attributable to the proposal
- A separate submission will be lodged in respect of objections to the relevant clauses of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulations, highlighted in the addendum attached.

I believe this application complies with Council's overall objectives for development within the zone and for the reasons abovementioned and detailed in this report should be approved.

Yours faithfully,



**David Casson**  
*Planning and Development Advisor*

## 7 Addendum

### Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulations – Checklist

<b>Part 3</b>	<b>Caravan Parks and Camping Grounds</b>	
<b>Division 1</b>	<b>Land &amp; Site requirements</b>	
17 – Min Size	(i) Caravan Park = 1ha (ii) Camping Ground = No min	There is more than 1 ha available on the subject land
18 Comm Amenities	(1) Min 10% - rec and comm	Satisfied
19 Site size	(1) Long term = 80sm (2) Short term = 65sm (3) Camp site = 50sm	Satisfied
20 Site ID	(1) Dwelling or camp site	Satisfied
<b>Division 2</b>	<b>Setbacks</b>	
21 Access to road frontage	Dwelling site only	No dwelling sites provided
22 Setback of community buildings	NA	Not applicable
23 Setbacks of dwelling / camp sites	1(a) 10m to public road (b) 3m to other boundary 2 – lesser distance If screened, fenced or otherwise	No dwelling sites proposed. Setback to Frances St is in line with the adjoining Transport Museum
25 Use of buffer ones	Can be used for community amenities, access road, car parking, footpath or landscaping	Satisfied
26 Separation distance	Moveable dwellings only	Not applicable
<b>Division 3</b>	<b>Roads</b>	
26 Entrance and exit roads	Min 7m wide	Satisfied
27 Forecourt	Caravan Park only	Space available
28 Widths of roads	Two way – 6m One way – 4m Signs needed for one way	Satisfied
29 – Speed limits	Max 15km/hr – signs needed	Signs to be provided
30 Resident Parking	1 per dwelling site / camp site	Sites accommodate vehicles
31 Visitor parking	1 per 20 short term sites	Four visitor spaces can be accommodated
32 Road surfaces	All weather sealed or other approved	Gravel all weather internal road provided

33 Lighting	Adequate between sunset and sunrise	No additional lighting is proposed given the self contained nature of the vehicles
<b>Division 4</b>	<b>Utility Services</b>	
34 Water Supply	CP or CG –must be connected to mains water supply	Main supply available – multiple tap points provided
35 Sewerage	CP or CG must be connected to sewer Short term site in CP or Cg – min 1 soil waste dump point	Sewerage main connection to dump point provided
36 Drainage	Dwelling and camp sites to be adequately drained	Sites will be adequately drained
37 Electricity	Applies to dwelling sites	Not applicable
38 Common Trenches	Permissible	Not applicable
<b>Division 5</b>	<b>Shower and Toilets</b>	
39 Modification of calculations to calcs	2 camp sites = 1 dwelling Dwelling site with ensuite facilities not included	Noted
40 Showers and toilets to be provided		Objection to this standard to be lodged
41 Disabled facilities		Objection to this standard to be lodged
42 Other facilities		Objection to this standard to be lodged
43 Shower blocks and toilets		Objection to this standard to be lodged
44 Proximity of dwellings		Objection to this standard to be lodged
<b>Division 6</b>	<b>Laundry Facilities</b>	
45 Modification of calculations	2 camp sites – short term site	Noted
46 Washing machines	– at least one required	Objection to this standard to be lodged
47 Laundry tubs	- at least one required	Objection to this standard to be lodged
48 Clothes dryer	at least one required	Objection to this standard to be lodged
49 Drying area	50 m min length required	Objection to the standard to be lodged
50 Water supply	Hot and cold water to wash machi and tub	Objection to this standard to be lodged
51 Ironing facility	Borad, Iron and power required	Objection to this standard to be lodged
52 Construction of laundry block	Must be brick or concrete masonry unless otherwise provided in an approval	Objection to this standard to be lodged
53 Maintenance	Laundry facilities to be maintained	Objection to this standard to be lodged



<b>Division 7</b>	<b>Management</b>	
54 Max persons per site	Max 12 persons per site permitted	Custodian responsibility
55 Register of occupiers	Register with details to be kept	Custodian responsibility
56 Info for prospective occupiers	Relevant / specific info to be made available	Custodian responsibility
57 Use of CP or CG	Prohibited uses nominated	Custodian responsibility
58 Community map	Map to be available and displayed	Custodian responsibility
59 Access to approval and map	Approval, community map and regulation to be available	Custodian responsibility
<b>Division 8</b>	<b>General</b>	
60 Garbage removal	Removal and clean areas to be maintained	Noted – will comply
61 Fire hydrants	No part of sites to be more than 90m	Noted – location to be confirmed
62 Fire Hose Reels	Located to reach all sites	To be provided – refer to site plan.
63 Car wash bay	Caravan park only	Car washing within the parks is prohibited – no washing bay is proposed, as per all other RV parks.
64 Buildings	Cannot be erected without approval	Noted – will comply