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Ministry of Business Innovation & Employment
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TAUPŌ DISTRICT COUNCIL SUBMISSION: SUPPORTING SUSTAINABLE FREEDOM CAMPING IN AOTEAROA NEW ZEALAND

Thank you for the opportunity to comment on the Proposed Sustainable Freedom Camping discussion document. Please note this is a submission by staff and has not been endorsed by Council. We also thank staff from the Ministry of Business, Innovation and Employment (MBIE) who took time to discuss the proposals with Council officers and held a public discussion forum with Taupō community members.

Tourism is fundamental to Taupō's economy, contributing nearly 15 per cent to local GDP and employing almost a quarter of the district's working age population. Freedom camping is a subset of Taupō's tourism industry. It has become a popular option for visitors around New Zealand and offers an affordable holiday for domestic and international travellers.

Across the district there has been a noticeable increase in the presence of freedom campers in recent years. To help address the social and environmental pressures arising from this increase, TDC adopted a freedom camping bylaw in 2017. This bylaw is up for review in the coming year and we are interested in how the Sustainable Freedom Camping proposals will impact on our review.

Taupō District Council (TDC) supports the overall intent of the Sustainable Freedom camping proposal. We agree that striking the right balance between Kiwis (and international visitors) having the freedom to enjoy New Zealand's natural environment whilst maintaining the quality of that natural environment both now and into the foreseeable future is of paramount importance.

PROPOSAL ONE

It is widely acknowledged that the appeal of freedom camping to tourists lies in its affordability and ease. Research done by Allen & Clarke¹ estimates the cost of converting a regular motor vehicle to a self-contained vehicle (SCV) ranges anywhere from \$800 for bare minimum changes to meet the SCV standard to up to \$30,000 for a full and comprehensive fit out.

¹ Hartley, A. & Palmer, A. (for Allen & Clarke), 2021. *Research to inform the Responsible Camping discussion document and regulatory impact analysis.*

Limiting all vehicle-based camping to only SCVs risks disadvantaging members of the public who are financially constrained and unable to avoid the conversion costs.

TDC submits that responsible freedom camping has a long history in New Zealand. Not only do Kiwis enjoy travelling around the country, but some view the freedom to camp outside commercial or private grounds as an intrinsic part of their birth rights as New Zealanders. Therefore, restricting vehicle-based camping to SCVs alone will likely impinge on these rights and disadvantage the less well-off who are unable to undertake conversion or hire SCVs.

PROPOSAL TWO

TDC's operative Freedom Camping Bylaw 2017 has adopted similar provisions to this proposal. In our bylaw, a person may freedom camp in an SCV in any Council owned area with the exception of expressly prohibited sites. However, freedom camping in a non-SCV can only be done at designated open freedom camping sites with toilet facilities.

We view this proposal as being best able to balance the competing needs of protecting the environment and the public from nuisance alongside allowing visitors (both domestic and international) the ability to travel and see New Zealand as their means and interests allow.

PROPOSAL THREE

TDC agrees with the recommendation to grant regulatory powers to an agency to have national oversight of legislated requirements for self-contained vehicles, including establishing a national database of vehicles that are certified self-contained.

While our bylaw currently allows vehicles with a self-contained sticker to enjoy the benefits of being able to park outside designated freedom camping sites, there is no way for Council officers to verify that such vehicles are truly self-contained in line with the requirements of *the New Zealand Standard, NZS 5465:2001 Self-containment of motor caravans and caravans (Self Contained Vehicle Standard - SCVS)*. Having an agency with oversight over this function will help to ensure that TDC's Freedom Camping Bylaw functions as envisaged.

TDC acknowledges that there will be a cost to individuals and businesses seeking a self-containment certification. The MBIE proposal document estimates this cost at about \$125 every four years, approximately \$35 per year. This amount is comparable with other vehicle compliance costs currently charged nationally and we do not think it is an unreasonable charge, more so when compared with the environmental and compliance benefits that may accrue.

In terms of penalties, TDC believes the current penalties provided for in the Freedom Camping Act are adequate. As with other bylaws, having to institute a court process to recoup unpaid penalties is a major deterrent to Councils enforcing penalty regimes. It is difficult to see what benefits an increase in penalties payable will provide above the current amounts.

PROPOSAL FOUR

The current voluntary standard for self-containment does not lend itself to standardization, and TDC supports the strengthening of requirements for self-containment. We however do not think that fixed toilets should be made mandatory for certification and suggest retaining the current provisions that allow a wide range of toilet types to be used in an SCV.

We however share MBIE's concern around the current practice of certifying vehicles that are clearly unsuitable for self-containment as SCVs. In strengthening the requirements for self-containment, we urge MBIE to consider features such as vehicle height and minimum head clearance. It is also worth considering a tiered self-containment classification process to help account for the grey space between well-equipped SCVs and non-SCVs, as a number of vehicles currently fall into this category and bespoke arrangements could be made to help cater for this group

Such an arrangement will help limit the risk of designated freedom camping areas being overrun at peak seasons by both non SCVs and partial SCVs.


OTHER RECOMMENDATIONS

A large bulk of the vehicles we see being used for freedom camping are ageing and are associated with high rates of carbon emissions. The proposal document doesn't explore these linkages. We think this a missed opportunity in helping to advance New Zealand's Climate Change response as transport emissions currently account for 21 percent of the country's annual greenhouse gas emissions.

For matters relating to this submission, please contact Témi Allinson - Policy Advisor, by email tallinson@taupo.govt.nz or ph. 07 376 0714.

Ngā Mihi

Privacy of natural persons



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