

13 May 2021

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Ministry of Business, Innovation and Employment
15 Stout Street
PO Box 1473
Wellington 6140

By email: responsiblecamping@mbie.govt.nz

Dear Sir/Madam

RE: SUPPORTING SUSTAINABLE FREEDOM CAMPING IN AOTEAROA NEW ZEALAND

The Grey District Council thanks the Ministry of Business, Innovation and Employment for the opportunity to make a submission on the issue of Freedom Camping in Aotearoa New Zealand.

In the Grey District, we wholeheartedly welcome freedom campers into our area, and we consider ourselves to be a Freedom Camping Friendly District. We want the ability to encourage freedom camping into the district, however it essential that this ability means that we can encourage an appropriate version of freedom camper here.

What this means for us is that the Grey District Ratepayer will not have to supply funds for Council to clean up after the inappropriate version of freedom campers. It also means that the Council will not have to be responsible for providing and maintaining the additional amenities that are required to accommodate the inappropriate version of freedom camper. These significant additional costs to the ratepayer, with absolutely no return are unable to be sustained into the future with a population base that is forecast to decline by 8% by 2043 (Statistics New Zealand). It is also noted that the Grey District has 19.3% of their population aged 65 years and older, while the rest of NZ has 15.6% (Infometrics).

We have recently engaged with our community and made changes to the Grey District Council Responsible Freedom Camping Bylaw, and we feel it necessary to comment that this is only Council controlled land that we are able to legislate for. Our community's views on the issues of freedom camping are very strong, however we are surrounded by land under the control of other government agencies, such as Waka Kotahi – NZ Transport Agency and Department of Conservation – Te papa Atawhai. Council is unable to satisfy many issues that were raised by the community when our bylaw is out of step with the legislation set by central government.

Proposal 1

We agree with this proposal to make it mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle.

This will assist the Council in the issues that we are facing in terms of sustainability, as well as support the recent changes we have made to the Grey District Council Responsible Freedom Camping Bylaw. It should be noted that some rental companies charge a fee should the internal toilet facilities be used. This should be discouraged.

Proposal 2

Make it mandatory for freedom campers to stay in a vehicle that is certified self-contained unless they are staying at a site with toilets.

We do not agree with this proposal, as the areas that we have set aside in the Grey District have become de-facto camping grounds that the community is unable to utilise. We have evidence that at least two of these sites in the Grey District have experienced over-crowding and multiple health and safety issues because of the

sheer number of people using the site to camp at. The sites were then unable to be used by many other members of the community who were trying to enjoy the area for recreational purposes.

We consider that overall, non-self-contained freedom campers should stay in areas designated for camping. These sites are usually serviced by appropriate facilities built specifically for camping activities. We do not want public toilet facilities to become a de-facto camp site, as this causes over-crowding and the area becomes unavailable for ratepayers and people residing in the community.

Proposal 3

Improve regulatory tools for government land managers:

- **Regulatory system for self-contained vehicles**

We support improving the regulatory systems for self-contained vehicles, as currently council staff have experienced issues with the current system. There are issues where there is evidence to suggest that the certification should not have been given, as well as when there was not regulator to make sure that the self-containment standards were being adhered too since receiving certification.

Council also believes that establishing a database of self-contained vehicles would make enforcing these regulations simpler at a local level.

- **Stronger infringement scheme**

Council supports this approach, however, does not believe confiscation is a suitable option. Confiscation at a local level would put increased pressure on our local resources, which are already under strain.

Council would support an approach that sees rental vehicle companies being required to on-charge enforcement notices to the customer's credit card should an offender leave New Zealand after incurring a fine.

Council supports being able to increase enforcement where more serious offences have taken place:

1. When human or other waste has been left behind
2. Where vehicles are fraudulent in the display of certification

Proposal 4

Strengthen the requirements for self-contained vehicles:

- **What types of toilets are suitable?**

Council supports that only vehicles with toilets that are available for use as a toilet at all times ie requires no set-up or removal from the vehicle for use should be a requirement of being considered certified self-contained. Currently there are situations where the vehicle is considered self-contained when the toilet is nothing more than a bucket or cassette, that is required to be set up, this is when they are not utilised and there are issues with human waste.

Council considers it a necessity that a toilet be a permanent feature inside the vehicle for the vehicle to be considered certified self-contained.

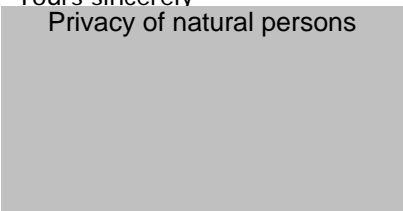
- **What types of vehicles are suitable?**

As with the above, Council supports that only vehicles that have the ability to have a permanent toilet set up at all times should be considered as certified self-contained.

Grey District Council also endorses and agrees with the submission made by Taituarā.

Yours sincerely

Privacy of natural persons



Paul Morris
Chief Executive