

## New Plymouth District Council submission on the proposed changes to support effective management of freedom camping in New Zealand

Proposal	NPDC position	NPDC comments
Proposal one - MAKE IT MANDATORY FOR FREEDOM CAMPING IN A VEHICLE TO BE DONE IN A CERTIFIED SELF-CONTAINED VEHICLE	New Plymouth District Council supports Proposal one.	<p>Historically, New Plymouth District Council has faced a degree of controversy in regard to freedom camping, in particular, the provisions for NSC freedom camping – when the Freedom Camping Bylaw was first adopted, there was overcrowding and the associated issues at a number of sites in the district. The Bylaw has undergone a number of iterations, and now has nine prohibited areas, and two restricted areas, which allow for a total of ten NSC freedom campers in the district.</p> <p>Comments on proposal one are below:</p> <p><b>NPDC supports this proposal for the following reasons:</b></p> <ul style="list-style-type: none"> <li>- It would remove contention around bylaw making and the provisions for NSC vehicles within Council bylaws – whether to allow / restrict / prohibit NSC vehicles, where they would be permitted and how many NSC vehicles would be permitted at individual sites.             <ul style="list-style-type: none"> <li>o NSC freedom camping has caused a lot of debate within the community, with local residents in affected areas feeling the burden of NSC freedom campers – through the loss of amenity in their area, the sights they see (freedom campers showering at beach showers etc.), overcrowding of facilities, rubbish levels and environmental impacts.</li> </ul> </li> <li>- This proposal, along with proposals three and four would make administration of freedom camping more straight forward.</li> <li>- This proposal aligns with NPDC’s vision of being a Sustainable Lifestyle Capital             <ul style="list-style-type: none"> <li>o It protects the environment by removing vehicles that are not appropriately equipped with waste / water facilities.</li> </ul> </li> </ul>

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		<ul style="list-style-type: none"> <li>○ It maintains tourism opportunities (through the provision for SC vehicles in Council bylaws, and NSC vehicles provided for through commercial campgrounds).</li> </ul> <p><b>Potential impacts / considerations</b></p> <ul style="list-style-type: none"> <li>- Infrastructure – <ul style="list-style-type: none"> <li>○ It is likely that the need for dump stations will increase with the increased number of SC vehicles (in May 2020 Council completed works for a dump station at a cost of \$199,000 excl GST).</li> <li>○ While removing NSC reduces the pressure on public toilets, NPDC is aware that some SC campers still prefer to use public toilets (or even bush areas) rather than use the toilets within the vehicle.</li> </ul> </li> <li>- There will be an increased tourism footprint at sites previously protected from NSC vehicles – <ul style="list-style-type: none"> <li>○ With the conversion of NSC to SC, there may be an increase in SC vehicles – who tend to have more liberal provisions in Council bylaws. Therefore, sites open to SC vehicles may experience an influx of campers (from those NSC vehicles that have been converted to SC). This may result in more pressure at particular sites and a need to review bylaws in light of this (which may result in more restrictions for SC vehicles).</li> </ul> </li> <li>- Consideration for the status quo to remain in that local authorities are able to restrict, prohibit or permit camping, i.e. allowing provision for NSC freedom camping through Council bylaws, for example a blanket rule to have NSC vehicles prohibited, but provide the ability for Councils to make an exception to this rule, or a restricted allowance for NSC vehicles if/where appropriate.</li> <li>- Is there a clearer prediction as to whether there will be an increase / decrease in tourism numbers – will NSC convert to SC and still travel, or</li> </ul>

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		<p>will travel be too expensive and become inaccessible for NSC freedom campers?</p> <ul style="list-style-type: none"> <li>- NPDC is concerned with further disadvantaging the homeless. The homeless should be clearly excluded from the entire freedom camping regulation system, and instead there should be clear referral pathways and resources provided to TLAs (working with other agencies) for those who are homeless in NSC vehicles.</li> </ul>
<p>Proposal two – MAKE IT MANDATORY FOR FREEDOM CAMPERS TO STAY IN A VEHICLE THAT IS CERTIFIED SELF-CONTAINED, UNLESS THEY ARE STAYING AT A SITE WITH TOILET FACILITIES</p>	<p>If Proposal One is not adopted, New Plymouth District Council supports Proposal Two.</p>	<p>Proposal Two aligns with NPDC’s current regulations. NPDC supports this proposal as an <u>alternative</u> to Proposal One.</p> <p>There is a need to ensure that SC freedom campers are actually using the facilities, as opposed to freedom camping and defecating in the environmental surrounds.</p>
<p>Proposal three – IMPROVE THE REGULATORY TOOLS FOR GOVERNMENT LAND MANAGERS</p>	<p>New Plymouth District Council supports Proposal Three</p>	<ul style="list-style-type: none"> <li>- NPDC supports an increase in penalties. <ul style="list-style-type: none"> <li>o Infringement revenue is not sufficient to cover the cost of enforcement</li> <li>o Freedom camping penalties need to represent a serious deterrent to undesirable camping behaviour.</li> <li>o Penalties in line with Reserve Act tariffs makes sense.</li> </ul> </li> <li>- Councils need support / tools in place to address the low collection rate of infringement fines issued to international visitors; for example, amending the Act, to ensure those who rent the vehicles are responsible for passing on the fine to those responsible. Rental companies have options for collection, for example collection of a bond.</li> <li>- NPDC supports collection of unpaid fines when tourists are exiting the country.</li> <li>- NPDC supports the strengthening of the infringement scheme by introducing an infringement to address campers fraudulently claiming to be certified self-contained.</li> <li>- Vehicle confiscation, there is a risk that Council will end up with a number of NSC vehicles impounded and not worth picking up.</li> </ul>

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Proposal four – STRENGTHEN THE REQUIREMENTS FOR SELFCONTAINED VEHICLES	New Plymouth District Council supports Proposal Four	<p>NPDC fully supports the recommendation from The Parliamentary Commissioner for the Environment:</p> <ul style="list-style-type: none"> <li>- Strengthen the SCVS to require vehicles to have a permanently plumbed toilet; reintroduce national oversight of the SCVS, and that either Waka Kotahi New Zealand Transport Agency (Waka Kotahi) or MBIE be responsible for this.</li> </ul>