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Submission on the Freedom Camping Discussion document

This submission is made by Regional Tourism New Zealand, (RTNZ), on behalf of its constituent members.

If you wish to contact us regarding this submission, in the first instance, please telephone Charlie Ives, Executive officer on 027 230 2293. Or e-mail at charlie@rtnz.org.nz

In respect of the proposals provided we would make the following comments.

Proposal One: Make it mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle.

We support this proposal as it will direct non self-contained vehicles to designated sites, such as commercial holiday parks, DoC campsites and camping grounds.

It will encourage better behaviours, and with a national framework it should be easier for visitors to understand the regulations pertaining to where they can or cannot camp. This should reduce the incidences of waste, anti-social behaviour and other activities that communities see as undesirable. We understand this proposal will not affect people who freedom camp in tents, or where people are already excluded under the Freedom Camping Act.

However, our view is the current exceptions should remain, and there should be more clarity around temporary or short-term parking, day trip excursions, and resting or sleeping at the roadside in a caravan or motor vehicle.

While there will be a cost impact on current non self-contained vehicle owners to meet the minimum self-contained requirements of the proposal, this is a necessary step to meet environmental and sustainability standards in all of Aotearoa.

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.

The natural inclination of many freedom campers would be to seek out free camping spots, which in itself is in the spirit of the activity.

We would support Proposal 2, only on the proviso that local councils are willing and able to provide and maintain the appropriate facilities to accommodate self-contained vehicles at designated sites.

It is noted that this is the last round of the Tourism Infrastructure Fund. We would be concerned that the loss of this funding source, without any other resource being available to continue providing adequate toilets and waste disposal facilities, and not having continuing funding for maintenance, will create its own set of problems. This may erode community support if local ratepayer funding is allocated to mitigate these issues.

It may also create a perception amongst non self-contained vehicle campers that they too could camp at these sites. Therefore, very clear communication would need to be developed around different rules for different vehicle types.

It is also worth reflecting back on the challenges freedom camping in non-self-contained vehicles presented regions during the Covid-19 level 4 lockdown.

Police and other authorities were responsible for finding freedom campers and placing them into motels etc where they could use facilities. Shared facilities at campgrounds were often closed – and council public toilet facilities etc were definitely closed at the start of L4. Non-self-contained vehicles were unable to be used at all during self-isolation.

Therefore, self-contained vehicles provided the user with not only the ability to self-isolate, but the ability to freedom camp away from others – so perhaps also a feeling of security/health.

Proposal Three: Improve the regulatory tools for government land managers.

We support improving the regulatory system for self-contained, and non self-contained vehicles. Introducing a stronger enforcement regime, particularly to identify fraudulence around containment certification will be a positive step.

Certification could be part of the Warrant of Fitness process, and we believe a new or existing agency should be given oversight and powers nationally to enforce legislated requirements.

The penalty regime does require careful consideration, and while we support an increase in non-compliance fees the onus on collection will fall on local councils and enforcement officers. We see conflicts arising if the penalties are raised significantly, and would advocate for a stepped system from \$500 to \$1000 for the most serious breach. Confiscation of vehicles should be a last resort.

There is no clarity as to which entity is the recipient of the fines collected, and we would have some concern if these end up in the Consolidated Fund, or to solely fund the bureaucracy around a national oversight agency.

Local government, as the on ground enforcement agency, will bear the brunt of proposal 3, and therefore should be recompensed for their endeavours. We would also support allowing local councils to enforce rules on other government land, for example land administered by Waka Kotahi or LINZ.

Proposal Four: Strengthen the requirements for self-contained vehicles.

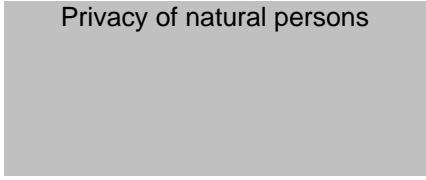
We support strengthening the requirements for self-contained vehicles, and again see the opportunity to enforce these through the Warrant of Fitness process. This must be no-voluntary.

A national entity needs to take responsibility for this, and compile a national register of certified self-contained vehicles. Toilets must be fixed and plumbed in by certified plumbers to ensure that portable toilets are not removed from the vehicles.

We agree local authorities, government agencies and not for profit organisations should work together on referral pathways for homeless people.

Yours sincerely

Privacy of natural persons

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Charlie Ives
Executive Officer