



Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Submission Form

How to provide us with feedback

The Ministry of Business, Innovation and Employment (MBIE) is collecting written submissions to gather a range of views on the Government's proposals to improve the management of freedom camping in New Zealand.

This submission form brings together all the questions asked throughout the discussion document *Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Proposed changes to support effective management of freedom camping in New Zealand*.

Please feel free to answer as many or as few of these questions as you wish.

For more information and discussion about these topics please refer to the discussion document available at <https://www.mbie.govt.nz/have-your-say/supporting-sustainable-freedom-camping-in-aotearoa-new-zealand>.

Your submission can be returned by email to responsiblecamping@mbie.govt.nz. Submissions are due by midnight on Sunday 16 May.

Use and release of information

After the consultation period has closed, MBIE will publish a summary of submissions on our website at www.mbie.govt.nz.

We will not be publishing any individual submissions or names of individuals who made a submission. We may wish to include part of your submission in the summary of submissions; in that case, MBIE will first ensure we have your permission to do so.

If you are submitting on behalf of a business or organisation, MBIE will consider that you have consented to the content being included in the summary of submissions unless you clearly state otherwise. If your submission contains any information that is confidential or that you do not want published, you can say this in your submission.

The Privacy Act 2020 applies to your submission. Any personal information you supply to MBIE through your submission will only be used by MBIE for the purpose of producing a summary of submissions. The summary will present themes and no personally identifiable information will be included. The summary will be reported to the Minister of Tourism and be published online.

Submissions may be subject to requests for information under the Official Information Act 1982 (OIA). If your submission, or part of it, comes within the scope of an OIA request, MBIE would normally release it (excluding any personal information) to the person who asks for it. If you consider there are reasons for MBIE to withhold any of the information you are providing, please indicate these reasons in your submission.

Your details

What is the name of the person making this submission?

Phil Parker

If you are submitting on behalf of an organisation, what is the name of that organisation?

South Waikato District Council

Is it okay for your organisation's details to be published if we publish which organisations made a submission, or include part of your submission in the summary of submissions?

- Yes, you can publish my organisation's details with information from my submission.
 No, keep my organisation's details confidential.

Can we use information in your submission as a case study in the summary of submissions?

- Yes, you can include information from my submission as a case study in the summary of submissions.
 No, keep my information confidential.

Please provide us with your email address in case we need to contact you about your submission.

Email

info@southwaikato.govt.nz

What sector(s) does your submission most closely relate to, if applicable?

For example, the sector in which you may work or operate, or which you represent.

- | | |
|--|--|
| <input type="checkbox"/> Accommodation provider | <input type="checkbox"/> Other tourism business |
| <input type="checkbox"/> Rental vehicle business | <input type="checkbox"/> Non-tourism business |
| <input type="checkbox"/> Iwi, hapū or Māori organisation | <input checked="" type="checkbox"/> Local Government |
| <input type="checkbox"/> Individual or camper | <input type="checkbox"/> Club or club representative (eg camping club) |
| <input type="checkbox"/> Other _____ | (please specify) |
| <input type="checkbox"/> N/A | |

Context to Supporting Sustainable Freedom Camping in Aotearoa New Zealand

1.1 How much do you agree that certain types of vehicle-based freedom camping is a problem? Please write a (Y) next to the option which applies to you				
Strongly agree	Agree Y	Neutral	Disagree	Strongly disagree
<p>1.2 What are your views on freedom camping in vehicles?</p> <p>When answering this question you may like to think about:</p> <ul style="list-style-type: none"> • Is vehicle-based freedom camping an issue in your area? • Have you observed any specific issues? • Are there specific behaviours which impact on your use of local amenities/infrastructure? • What benefits does vehicle-based freedom camping provide for your region? 				
<p>All freedom camping sites in the South Waikato District have toilet and rubbish disposal facilities provided. Generally, we have found vehicle-based freedom camping not to be a problem in our District. However, we have had issues with people who choose to live in a campervan or motorhome on these sites using the reserves as a place of residence, heavily utilising ratepayer funded facilities at sites where gas supplied hot water showers, barbeques and recycling bin stations are provided. This means an increase in costs for the supply of gas, refilling of water tanks and litter collection in each of these sites, which is unbudgeted for, given normally there is an increase in costs over the main January to December holiday period that then lessens during the cooler months, but with these costs now needing to be met throughout the year.</p> <p>We currently permit up to four weeks on sites so as to be campervan and motorhome friendly and welcome genuine freedom campers with our free Casual Camping Permit. Due to these capacity issues, we are considering the need to consult on amending the Freedom Camping Bylaw to reduce the Casual Camping Permit from a maximum of four weeks to a maximum of two weeks only on any one site per month from March to November with an option to stay for a maximum of four weeks within one month (i.e, two permits issued consecutively) over the December to February period only, with a mandatory break of 3 months required before being eligible to freedom camp within the District again.</p>				

How much do you support the proposal to make it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle?

2.1

Please write a (Y) next to the option which applies to you

Strongly agree	Agree Y	Neutral	Disagree	Strongly disagree
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Do you support this proposal?

When answering this question you may like to think about:

2.2

- Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

We consider this option will improve camper behaviour, but only if regulatory enforcement is stronger. We do not consider that there will be much of a change to tourism outcomes in our District, because of the toilet facilities available at permitted freedom camping sites and generally responsible camping being undertaken.

How might this proposal impact you?

When answering this question you may like to think about:

2.3

- Will this proposal increase or decrease the likelihood of you camping?
- Will this proposal have a direct financial impact on you or your business?
 - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

What things should Government consider to implement this option?

When answering this question you may like to think about:

2.4

- What exceptions should Government allow under this proposal?
- Do you have any ideas about how this proposal could be implemented?
- Should this option be considered alongside other options proposed in this discussion document?

We consider that there should be exceptions where facilities are available at permitted sites. We have three reserves in the District with shower facilities available free of charge as well as toilet and refuse facilities. There is no requirement for vehicles to be self-contained at these reserves due to the provision of the aforementioned infrastructure. Genuine freedom campers do not increase pressure on the infrastructure. Currently, Council would not have the resources to ensure compliance with this proposal if it were to be Council's responsibility to ensure compliance at its freedom camping sites.

How much do you support the proposal to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at a site with toilet facilities (excluding public conservation lands and regional parks)?

3.1

Please write a (Y) next to the option which applies to you

Strongly agree Y	Agree	Neutral	Disagree	Strongly disagree
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Do you support this proposal?

When answering this question you may like to think about:

- Do you consider this option will improve camper behaviour?
- 3.2 • Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

The Fresh Info Responsible Camping Research 2019/20 provides that nationally, approximately 95% of domestic responsible campers used a vehicle with a toilet (in-built or portable). In the South Waikato District in the 2019 calendar year, there were approximately 13,000 responsible camping nights spent, and 60% of those nights were by domestic visitors. Our District’s permitted freedom camping sites have toilet facilities provided, and we find little impact to our District’s environmental and social outcomes from freedom camping.

How might this proposal impact you?

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?
- 3.3 • Will this proposal have a direct financial impact on you or your business?
 - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

What things should Government consider to implement this option?

When answering this question you may like to think about:

- What do you think is required to achieve this option?
- 3.4 • What exceptions should Government allow under this proposal?
- How far from toilet facilities should a person be able to freedom camp if not in a vehicle with a toilet? eg, 100 metres, 200 metres?
- Should this option be considered alongside other options proposed in this discussion document?

Our current regime works well. We advertise on the Council websites and in pamphlets the requirements for freedom camping, or Casual Camping, in the South Waikato District (to be in a self-contained vehicle at

certain sites, and where self-contained vehicles aren't required). The lack of impact on our sites shows that freedom campers do tend to adhere to these requirements.

We do not consider that there should be exceptions to this proposal.

50 metres seems to be a reasonable distance from facilities if freedom camping in a vehicle without a toilet.

We believe that improving regulatory tools for government land managers and strengthening the requirements for self-contained vehicles (proposals 3 and 4) should be considered alongside this proposal.

How much do you support the proposals to improve the regulatory tools for government land managers?

4.1

Please write a (Y) next to the option which applies to you

Strongly agree Y	Agree	Neutral	Disagree	Strongly disagree
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Do you support this proposal?

When answering this question you may like to think about:

- Are there any specific parts of this proposal you support or propose?
- 4.2 • Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

We support this proposal but consider that more tools are needed to work with non-genuine freedom campers, i.e. those that choose to live in a campervan or motorhome and utilise facilities available at freedom camping sites. We currently provide showers, toilets, barbeques and refuse receptacles at several sites, which are frequented by non-genuine freedom campers. We believe that to camp is to live for a time, temporary in nature, while travelling or on holiday. There is a cost involved with these non-genuine freedom campers who are residing long term in the reserves and utilising facilities.

Currently, we use Council's Public Places Bylaw 2017 for its powers, opposed to the Freedom Camping Bylaw 2017, to move on non-genuine freedom campers.

For this reason, we consider that the Freedom Camping Act 2011 should be amended to actually define "Camping" to make clear it refers to an outdoor activity involving overnight stays away from home in a shelter, such as a tent or a recreational vehicle; and to also include under the "Freedom camping does not include the following activities" heading the using of freedom camping sites for residing purposes.

There is concern that homeless people residing in freedom camping sites could result in local government being faced with problems without appropriate resources. As previously mentioned, there is a cost to Council and its ratepayers from non-genuine freedom campers, which includes homeless and those who choose as a deliberate lifestyle choice to live in a campervan or motorhome at freedom camping sites.

How might this proposal impact you?

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?
- 4.3 • Will this proposal have a direct financial impact on you or your business?
 - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

What things should Government consider to implement this option?

When answering this question you may like to think about:

4.4

- What would you like to see in practice?
- Should this option be considered alongside other options proposed in this discussion document?

This option should be considered alongside other options proposed in this discussion document. We would like to see more tools for councils to deal with non-genuine freedom campers.

What would be an appropriate penalty?

When answering this question you may like to think about:

4.5

- Should non-compliant vehicles be confiscated? If so, under what conditions?
- If vehicles are confiscated, what conditions should be placed on returning the vehicle?
- Should fines be similar to those for not holding a valid Warrant of Fitness for a motor vehicle?
- What levels should fines be set at?
- Who should collect a fine?

Council doesn't currently have an impounding area, nor the resources to enforce compliance beyond the current requirements. If non-compliant vehicles were to be capable of being confiscated by council, resources would need to be made available.

Fines should be similar to those for not holding a valid Warrant of Fitness for a motor vehicle.

Non-compliant vehicles should be added to a register until certified as self-contained, which should be shared with appropriate authorities.

Council cannot currently issue an infringement if a person is of no fixed abode.

Council officers would need to be warranted to impose fines.

Do you think that the requirements for self-containment should be strengthened?

5.1 Please write a (Y) next to the option which applies to you

Yes Y

Neutral

No

Is the current standard fit for purpose?

When answering this question you may like to think about:

5.2

- Should there be a requirement that self-contained vehicles have fixed toilets?
- Should there be specific reference to the types of vehicles that can be self-contained?

We consider that the current standard is fit for purpose but should be mandatory and not just voluntary like present.

We do not consider that fixed toilets are necessary. The *Responsible Camping Research 2019/20* (April 2020) by Fresh Info found that in-built toilets were used by a significantly higher percentage of responsible campers than portable toilets across domestic and international visitors with bought and hired vehicles.

We do not consider that there should be a specific reference to the types of vehicles that can be self-contained.

Who should certify to the Standard?

When answering this question you may like to think about:

5.3

- Should any Plumber registered under the Plumbers, Gasfitters and Drainlayers Act 1976 be able to certify to the Standard, or should certifiers be separately recognised and licensed?
- Once a vehicle has passed its initial certification, should other entities be able to re-certify it?

We consider that any Registered Plumber may certify and re-certify vehicles.

What transition arrangements should be in place?

When answering this question you may like to think about:

- 6.1
- How long should Government give people to upgrade or dispose of their vehicles?
 - Should currently certified self-contained vehicles be exempt from any new rules?
 - Are there any other transition arrangements we should consider?

We consider that 12 months is sufficient to allow for any required transition to a certified self-contained vehicle.

How could Government ensure vulnerable groups are not further disadvantaged?

- 6.2
- Could Government make homelessness exempt from any new regulatory system? What might this look like?

We do not consider that homelessness should be exempt from any new regulatory system. “Homeless” does not automatically mean “vulnerable”, with some choosing as a way of life to live in campervans and motorhomes on freedom camping sites. Council does not have the resources to assist the homeless and see this as primarily the role of central government.

Negative behaviour associated with some homeless can become evident, and would be an unfair burden on ratepayers, should there be an exemption in any new regulatory system.

There is a cost to providing facilities at freedom camping sites that are over utilised by non-genuine freedom campers.

These facilities are for all residents and visitors to enjoy for the purpose of camping as a recreational pursuit and to facilitate tourism and economic development for the District. An exemption for homelessness may see an increase in non-genuine freedom campers taking advantage of a ratepayer funded activity, and inadvertently undermine the reason for the provision of these sites and facilities. This could in turn lead to councils, districts and regions gaining negative reputations.

7.1 Is there anything else on the proposed changes or discussion document you would like to mention?

As stated, we would like to see a strengthened definition of 'freedom camping' in the Freedom Camping Act 2011 to clearly define the act of "camping" and to further define what 'freedom camping' isn't, being long term stays/residing.