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14 May 2021

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Supporting sustainable freedom camping in Aotearoa New Zealand – Submission

Waikato District Council welcomes this opportunity to engage in consultation supportive of sustainable freedom camping in Aotearoa New Zealand.

Waikato District Council supports strengthening regulation by adding central government controls in addition to the controls available to local authorities. Waikato District Council also supports that the status-quo remains for local authorities to restrict or prohibit freedom camping through bylaws or notice making powers.

Waikato District Council has found significant value in the availability of the Responsible Camping Fund and use of Freedom Camping/Sustainable Camping Ambassadors. We would support continuation of the fund.

In this submission we support the proposals to improve the tools for regulators and a central register for certified self-contained vehicles for local authorities to access. We support having a central Government regulatory body with the authority to issue compliance certificates.

Specific comments/submissions as they relate to the four proposals detailed in the consultation document are as below.

Proposal 1 - 4		
Government Proposal	Expected outcomes if proposal introduced:	Submission
1: MAKE IT MANDATORY FOR FREEDOM CAMPING IN A VEHICLE TO BE DONE IN A CERTIFIED SELF-CONTAINED VEHICLE	<ul style="list-style-type: none"> • Reduced instances of inappropriate disposal of human waste • Increased numbers of people freedom camping in self-contained vehicles, tents, or using alternative accommodation (such as Youth Hostels) • No people camping in vehicles without toilets • A potential decrease in the number of price sensitive international visitors 	Strongly support (1.)
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 TOILET FACILITIES	<ul style="list-style-type: none"> • Increased numbers of people camping in certified self-contained vehicles • Increased congestion at some camping sites (at least during the adjustment period) 	<p>Oppose (4.) if there is a significant transition period to gain CSC compliance (longer than 12 months)</p> <p>Freedom campers (not certified self-contained) may put significant pressure on those sites which have public toilet facilities if their only option is to park there. This may cause public complaint, increased maintenance and demand for rubbish removal. May also result in the need for the commissioning of increased public toilet facilities at camping sites at considerable cost to the ratepayer.</p> <p>Support (2.) if transition period is 12 months or less.</p>
PROPOSAL 3: IMPROVE THE REGULATORY TOOLS FOR GOVERNMENT LAND MANAGERS	<ul style="list-style-type: none"> • Potentially greater compliance with local bylaws and DOC notices • Increased levels of enforcement (including penalties being passed to campers) from local councils if sufficiently resourced • Increased costs to individuals and businesses who seek self-contained vehicle certification • Similar numbers of vehicles are certified self-contained 	Strongly support (1.) Increased infringements and ability to confiscate vehicle, more onus on vehicle owner/user to comply, national database of CSC vehicles.

<p>4: STRENGTHEN THE REQUIREMENTS FOR SELFCONTAINED VEHICLES</p>	<p>This proposal will adopt aspects of the New Zealand Standard, NZS 5465:2001 Self-containment of motor caravans and caravans (SCVS), into law.</p> <p>Minimum requirements in the SCVS ›</p> <ul style="list-style-type: none"> • The vehicle has a toilet that is adequately secured when travelling and is usable within the vehicle, including sufficient head and elbow room whenever required, even with the bed made up. • The toilet must provide sufficient waste holding capacity for the occupants for a minimum of three days. • Toilet types can include: <ul style="list-style-type: none"> ○ Cassette toilet: a fixed toilet with a removable holding tank. Composting toilet: a toilet that is an aerobic processing system to treat human waste, by composting. ○ Where any waste water is separated it shall be via a black water tank. Efficiency flushing toilet: a toilet which is flushed by a small volume of water. Marine toilet: a fixed flushing toilet with a macerator pump, either manual or electrically operated. Permanent toilet: a toilet that is permanently fixed inside the motor caravan. Portable toilet: a toilet with its own holding tank, the toilet is not fixed to the motor caravan. • The vehicle has a sealable solid waste container for rubbish. • The vehicle is fitted with water supply tank(s), having a capacity of not less than 4 L per person for a minimum of three days. Transportable, individual containers are acceptable. • The vehicle is equipped with a sink. • The vehicle provides a waste tank(s) to receive all the waste water from permanently installed fixtures, with corresponding capacity. 	<p>Support: Yes (1.) With fixed toilet.</p>
<p>Transitional Arrangements</p>		<p>With regards to a transition phase where vehicle owners</p>

		<p>will have a grace period (possibly 12 months) to either dispose of or update their vehicles. We would support this.</p> <p>We would also support currently certified vehicles to remain as is (not have to go through re-certification) as long as the certification is current.</p> <p>We would not support exempting homelessness (as a defence for non-compliant freedom camping) as part of the change. Our officers act with empathy and discretion and occasionally engage with homeless campers - guiding them to more appropriate camping sites and other public facilities. Homelessness is best addressed by agencies who are able to assist, rather than going unchecked because individuals will be able to freedom camp (without adequate long term facilities, care or contact).</p>
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Waikato District Council looks forward to also engaging in consultation on wider reforms to the Freedom Camping Act 2011.

Yours Faithfully

Privacy of natural persons

Sue O’Gorman

General Manager Customer Support