

# HURUNUI DISTRICT COUNCIL

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Ministry of Business, Innovation and Employment  
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## **Hurunui District Council's Submission on the proposed Freedom Camping Regulations.**

1. Hurunui District Council (HDC) thanks the Ministry of Business, Innovation and Employment (MBIE) for the opportunity to make a submission on the proposed regulations.
2. The Hurunui District is located in North Canterbury. We have approximately 13,450 residents and cover an area of 8,640km<sup>2</sup> of predominantly rural land. Our District spans from the east coast to the Main Divide. The Kaikoura District borders Hurunui District to the north, and Waimakariri District to south. Christchurch is approximately 35 minutes' drive to the south.
3. HDC has a freedom camping bylaw which generally requires freedom camping to be in self-contained vehicles, although certain areas are designated to allow non-self-contained vehicles and/or tents.
4. HDC has experienced problems arising from the use of purported self-contained campervans over several summers. Our community has also consistently expressed concerns in line with those outlined in the Background section of the discussion document, namely:
  - a perception that freedom camping has negative impacts on the local environment
  - a lack of trust in the self-containment system
  - frustration at the use of campervans with clearly inadequate provisions for self-containment.
5. As a result of these experiences and the community's concerns HDC supports measures that will increase the robustness and integrity of the self-containment certification system and reduce the possibility of negative environmental impacts from freedom camping.

6. HDC has provided specific comment on the following matters:
  - Self-containment technical requirements
  - Self-containment documentation
  - Infringement fees and fines
  - Exclusions from regulatory requirements
7. HDC has not commented on self-containment certification authorities or levies and fees payable for certification.

### **Self-containment technical requirements**

8. HDC supports Option 2 – a prescriptive approach to setting technical requirements.
9. We accept that either the ‘prescriptive’ or the ‘light touch’ options presented are capable of achieving good environmental outcomes. In fact, we see similarities between the approach of Option 1 (light-touch) and the current Building Code – being focused on functional and performance requirements. Our experience of this approach is that it does provide options for innovation and would likely offer cost-efficient solutions for vehicle owners.
10. However, we consider that the following are potential risks to success for Option 1:
  - Failure to produce and maintain formal guidance documentation
  - Reliance on the exercise of judgement by vehicle inspectors.
11. Based on those risks HDC believes that a prescriptive approach to the technical requirements, as per Option 2, is likely to produce more consistent results, better environmental outcomes overall, and instill greater public confidence in the certification system.

### **Self-containment documentation**

12. HDC supports the proposal to retain the current format of the self-containment warrant, with a change of colour to distinguish it from the old system, and the inclusion of the following information (as per the consultation document):
  - The licence plate details of the vehicle
  - The date the warrant was issued
  - The date the warrant expires
  - The name of the certification authority that issued the warrant
  - The maximum number of people for which the vehicle has been certified as self-contained
  - A unique number that identifies the vehicle
  - A scannable QR code or barcode included to access the above information.
13. The self-containment warrant is the primary source of information for enforcement officers performing checks on the self-containment status of camping vehicles. As such, HDC supports the inclusion of the above information to allow enforcement officers to clearly determine that the

warrant applies to the vehicle they are checking and identify it as having been certified under the new regime.

14. If a QR code or barcode is being considered to assist enforcement officers HDC suggests that this be scannable through a phone app without the need for additional equipment.
15. As officers will rely on the self-containment warrant, we do not have any comment on the contents of the self-containment certificate.
16. HDC supports the removal of the generic identifiers. The current blue stickers are something of a red herring (given that they are not used to determine the certification status of camping vehicles) and hold little credibility with the public due to their well-documented application to vehicles with dubious self-containment credentials.

#### **Infringement fees and fines**

17. HDC supports the introduction of a tiered approach to infringement fees. Our preference is for Option 2 – a tiered approach with a maximum infringement fee of \$1000.
18. HDC notes that the higher infringement fee categories (\$800 or \$1000) are intended to apply only to situations where actual damage or adverse effects have occurred. Given that such damage will likely have to be rectified at a cost to the council HDC is in favour of the higher (\$1000) infringement fee.

#### **Exclusions from regulatory requirements**

19. HDC supports Option 1 – that there are no exclusions from regulatory requirements.
20. We consider that exclusions from the regulatory requirements would not support the purpose of these reforms and could potentially result in the envisaged improvements to environmental outcomes not being achieved.

Should you require any further information or clarification on our submission, please feel free to contact me.

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