

6 October 2022

Ministry of Business, Innovation and Employment  
15 Stout Street  
Wellington 6140

## **Porirua City Council submission to the Freedom Camping Regulations discussion document**

### **General Feedback**

Thank you for the opportunity to submit on the Freedom Camping Regulations discussion document. We support the intent of the discussion document, and the Self-contained Motor Vehicles Legislation Bill, to ensure freedom camping is done in a way that protects the environment.

In Porirua our Reserves Management Plan restricts freedom camping to designated areas in specific reserves. Vehicles must display certification that they are self-contained in order to park in these areas. Despite having these rules in place, Porirua still has a significant freedom camping problem due to the difficulty of enforcing these rules. We frequently have freedom campers that are not in self-contained vehicles, even though most display a self-contained sticker.

Porirua City Council supports a regulated system for the certification and registration of self-contained vehicles. We suggest there be guidance provided to landowners, reserve administering bodies, and other land managers in enforcing the requirements within their rohe.

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

We support MBIE's preferred option of a 'light touch' approach to setting self-containment technical requirements, over a more prescriptive system. We appreciate the advantages of a less prescriptive 'light touch' system with less ongoing administration costs, the reduced need to update regulations as technologies change, and the enabling of innovation.

However, this needs to be supported by robust guidance for regulators as 'light-touch' regulations can be unclear. The previous voluntary standards system had low levels of trust and compliance, and there is a similar risk of this happening with less-prescriptive regulation if good guidance is not provided.

### **Self-containment certification authorities and vehicle inspectors**

We do not have a preference between the options suggested for self-containment certification authorities, provided councils are not responsible for certification or inspection.

### **Self-containment documentation**

We support MBIE's preferred option of a green self-containment warrant for self-contained vehicle documentation, rather than keep the current generic blue stickers. We require anyone camping at one of our identified freedom camping sites to be self-contained, so we support being able to easily identify compliant vehicles.

### **Infringement fees and fines**

We support a tiered infringement system that allows for greater fines for more serious acts. The current infringement fee of \$200 lacks the flexibility for Council to use discretion in enforcement and is an inadequate for the more serious offenses. We also support the ability to issue infringements electronically.

We support Option 2 with the higher maximum fee of \$1,000 where actual damage or adverse impacts have occurred. We believe this is an appropriate fine for the most serious offences.

### **Exclusions from regulatory requirements**

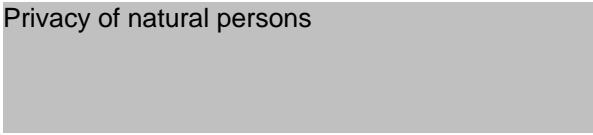
We support MBIE's preferred option to not have any exemptions to the regulations. It is the most straightforward from a communications and engagement, enforcement, and administration perspective. Exempting certain vehicles also undermines the overall intent of the Regulations.

**Levies and fees**

We do not have a preference between the options suggested for levies and fees but would support MBIE's preferred options.

Ngā mihi

Privacy of natural persons

A large grey rectangular redaction box covers the content of the letter, obscuring the name and contact information of the sender.

Wendy Walker

**Chief Executive**

**Kaiwhakahaere Matua**

**Porirua City Council**