

10 May 2021

Ministry of Business, Innovation and Employment
15 Stout Street
PO Box 1473
Wellington 6140

E: responsiblecamping@mbie.govt.nz

Dear Sir / Madam,

SUBMISSION TO MBIE ON SUSTAINABLE FREEDOM CAMPING

Waipa District Council appreciates the opportunity to comment on the discussion document *Supporting Sustainable Freedom Camping in Aotearoa New Zealand*. The submission was considered by Council's Strategic Planning and Policy Committee 4 May 2021.

You are welcome to make contact with Waipa District Council with regards to any of the points made in our submission. In this regard and in the first instance Graham Pollard can be contacted either via email at graham.pollard@waipadc.govt.nz or telephone at 07 984 7271.

Yours sincerely



Garry Dyet
CHIEF EXECUTIVE

Attachment: Waipa District Council Submission to the Ministry of Business, Innovation and Employment on Sustainable Freedom Camping

Submission to the Ministry of Business, Innovation and Employment on Sustainable Freedom Camping

By: Waipā District Council

Submission deadline: 16 May 2021

Introduction

1. Waipā is a landlocked territorial district in the Waikato Region, south of Hamilton. It is not a regular international visitor destination: tourism's pre-COVID contribution to the local economy was \$195 million, of which \$38 million (20%) was international¹.
2. Waipā's domestic visitor sector is focused mainly around events and sporting venues (such as the National Rowing Centre at Lake Karāpiro or the Avantidrome), visiting friends and relatives, and the weekend drive market. While not a major venue for freedom camping, Waipā is often used as a scenic base from which to visit nearby attractions such as Hobbiton, or as an overnight stop-over.
3. The district is bisected by the Waikato River, including the Karāpiro and Arapuni hydro lakes. Waipā District Council (Council) owns and manages several reserves on the banks of these two lakes, including six sites where self-contained vehicle-based camping is permitted for two consecutive nights. The Reserve Management Plans prohibit camping on the other lakeside reserves. Lake Ngā Roto is the only other reserve where freedom camping in a self-contained vehicle is permitted.
4. Council does not have a Freedom Camping Bylaw as camping is already restricted through Reserve Management Plans. There are few sites where freedom camping is currently practised that do not have toilet facilities.
5. Council experiences some issues with camping at the lakeside reserves each summer. These issues generally involve prohibited tent camping, overstayers, noise and litter; most reserves where camping is permitted have toilet facilities on site. At sites away from the Waikato River, freedom camping has not caused problems for Council or local residents.
6. Council supports the general intent of this reform to freedom camping regulations by strengthening the regulatory system and supporting responsible camping behaviour.

¹ MBIE Monthly Regional Tourism Estimates Jan 2021

Proposal 1

7. Waipā District Council strongly agrees with the proposal to make it mandatory for freedom camping in a vehicle to be done in a Certified Self-Contained Vehicle. This proposal is likely to limit further the impact of camping at any sites without toilet facilities, although this has not been an issue of concern in Waipā.
8. Council questions whether this proposal might lead to more people camping in tents so as to avoid the need for a self-contained vehicle. Therefore, in conjunction with proposal 1, proposal 2 needs to be accepted.
9. Council is concerned at the potential impact on vulnerable and homeless people living in non-self-contained vehicles. These proposals must help local authorities to manage this situation and not make matters worse for the people concerned for whom freedom camping may be their only affordable accommodation option. We recommend that, in these circumstances, rather than prosecution action being taken, a referral pathway be provided so they may be offered suitable local alternatives to freedom camping and access to other forms of assistance.
10. It is unlikely that this proposal will affect tourism in Waipā as Council already requires vehicles to be self-contained. However, given the cost of self-contained vehicles, we expect local people to continue their existing unauthorised camping in whatever vehicles and tents they have for their Christmas and New Year breaks beside the Waikato River. Resourcing to support education and compliance to manage this issue remains a challenge.

Proposal 2

11. Council supports the proposal to make it mandatory for freedom campers to stay in a vehicle that is certified self-contained, or to stay at a site with toilet facilities.
12. Council supports the application of this proposal to people who stay in tents as it reduces the likelihood of tents being used to evade the need to use a self-contained vehicle.
13. It is noted, however, that Council doesn't allow freedom camping in tents on its reserves. This policy is set out in the reserve management plans that cover Council's parks and reserves. This proposal is therefore unlikely to impact current freedom camping in Waipā.
14. There is a risk, however, that this proposal may create more pressure to enable tent-based freedom camping at our reserves with toilets as we know that groups such as the Responsible Campers Association Inc are trying to lobby all local councils to enable more tent-based camping. Council suggests that the guidelines should enable local authorities to continue applying current bylaw or Reserve Management Plan

restrictions on tent-based camping even if there is a toilet on site if those authorities deem there to be other local reasons for the restriction.

Proposal 3

15. Council supports the proposal to improve the regulatory tools for government land managers. Not only should the sustainable freedom camping regime be easier to comply with, but also needs to have a stronger infringement scheme and be easier to enforce.
16. At present Council does not have any easy options for monitoring, policing and responding to complaints. If new rules and regulations are introduced, councils need to have the ways and means to enforce them effectively. If councils benefited from receipt of fines, they would receive more resource to continue monitoring and enforcing the regulations.
17. The statutory authority for councils to issue infringement notices under all bylaws is long overdue and needs to be pursued by Government as a priority within local government.

Proposal 4

18. Council supports the proposal to strengthen the requirements for self-contained vehicles as part of the overall package of reforms to make freedom camping more sustainable and enforceable.
19. This proposal would help define what self-contained is and set a high standard for this.
20. In Council's view, self-contained vehicles should have fixed toilets as this would reduce the risk of contamination from spills on reserves as they are removed or replaced in the vehicles.