

6 May 2021



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

Attention: Responsible Camping Submissions

Tena Koe

Submission: Supporting Freedom Camping in Aotearoa New Zealand

Thank you for the opportunity to submit on the proposed changes for freedom camping in New Zealand. The location of the Rangitikei District, with State Highway 1 running north/south through the district, the Taihape-Napier Road and the stunning scenery our district has to offer means the number of freedom campers has been growing over time and we anticipate numbers will continue to increase. We support the Government's intent that *"Camping should have a net positive economic and social impact for communities, and must not harm the local environment"*.

Council does not currently have a Freedom Camping Bylaw and relies on the provisions in the Freedom Camping Act 2011. Freedom camping creates a number of both capital and operational costs for our district. Capital costs include pressure for the installation of toilets and dump stations. Operational costs include regular cleaning of toilet facilities, rubbish collection, emptying septic tanks, disposal of waste from dump stations, and responding to complaints of irresponsible dumping of rubbish and waste. Council is thankful of the support provided in recent years through the Tourism Infrastructure Fund for the upgrading of infrastructure in our district to support freedom camping. This support is essential for enabling Council to provide much needed infrastructure for freedom camping to occur in our district, particularly given our district's large land area and small rating base. We have previously received funding for toilets in our district and intend on continuing to seek funding opportunities.

We provide our feedback below under the four proposals included in the discussion document.

Proposal 1 or 2: Whether self-containment is mandatory

The discussion document requests feedback on whether it should be mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle (proposal 1) or whether it should be mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle unless they are staying at a site with toilet facilities (proposal 2).

Council generally supports increased requirements for self-containment of vehicles when freedom camping due to some campers not disposing of their waste appropriately (both human waste and rubbish). We do not support proposal 1 as we believe this approach would be too restrictive. Instead, we support proposal 2, however note that if proposal 2 was to be implemented increasing pressure would be placed on areas with toilet facilities and there would be a need for further support from Central Government for infrastructure investment e.g. toilet facilities (additional toilets in busy locations and investment in toilets in additional locations), and rubbish disposal. For

Making this place home.

both proposals we anticipate increased pressure for dump stations throughout the district and anticipate increased regulation will place pressure on resourcing for enforcement of the new requirements.

Proposal 3: Regulatory tools

The discussion document identifies a number of proposed methods for increasing regulatory tools; increasing fines, vehicle confiscation, introducing a regulatory system for self-contained vehicle certification, and allowing Council enforcement on government land. Council is generally supportive of increasing regulatory tools to address non-compliance. It is important the Council is able to recover any penalties for non-compliance to support the cost of enforcement action.

Proposal 4: Requirements for self-contained vehicles

Council is supportive of strengthening requirements for self-contained vehicles. In particular, Council supports the proposed improved system for certification of self-contained vehicles and supports enabling registered plumbers being able to certify to the standard. Council considers the proposed certification system would assist in increasing compliance and increasing the ease of enforcement. In addition, Council supports increasing requirements for the types of toilets that can be certified by requiring vehicles to contain a fixed toilet with a fixed holding tank that can be emptied at dump stations. In the Rangitikei District, issues have been experienced with campers emptying toilets with removable holding tanks in inappropriate places. We support the vehicles needing to provide at least three days of capacity for water and wastewater.

Transition

It is important that the transition towards the increased regulation occurs in a sustainable manner that does not unduly disadvantage freedom campers and does not put significant pressure on Council to deliver additional infrastructure that may not be currently budgeted for. Therefore, Council supports a transition of one year for uncertified vehicles to become certified, but where vehicles which are currently certified to the SCVS, enabling them to continue to be used for as long as the certification is valid (noting this could be up to 4 years).

Homelessness

The discussion document identifies the proposals are not intended to further disadvantage vulnerable population groups. Council supports this approach and agrees that homelessness should be exempt from any regulatory system and that Central Government continues investment in reducing homelessness in our communities.

Thank you again for the opportunity to provide comment on the proposed changes for freedom camping in New Zealand.

Yours sincerely



Andy Watson
Mayor of the Rangitikei