



## Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Submission Form

### How to provide us with feedback

The Ministry of Business, Innovation and Employment (MBIE) is collecting written submissions to gather a range of views on the Government's proposals to improve the management of freedom camping in New Zealand.

This submission form brings together all the questions asked throughout the discussion document *Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Proposed changes to support effective management of freedom camping in New Zealand*.

Please feel free to answer as many or as few of these questions as you wish.

For more information and discussion about these topics please refer to the discussion document available at <https://www.mbie.govt.nz/have-your-say/supporting-sustainable-freedom-camping-in-aotearoa-new-zealand>.

Your submission can be returned by email to [responsiblecamping@mbie.govt.nz](mailto:responsiblecamping@mbie.govt.nz). Submissions are due by midnight on Sunday 16 May.

### Use and release of information

After the consultation period has closed, MBIE will publish a summary of submissions on our website at [www.mbie.govt.nz](http://www.mbie.govt.nz).

We will not be publishing any individual submissions or names of individuals who made a submission. We may wish to include part of your submission in the summary of submissions; in that case, MBIE will first ensure we have your permission to do so.

If you are submitting on behalf of a business or organisation, MBIE will consider that you have consented to the content being included in the summary of submissions unless you clearly state otherwise. If your submission contains any information that is confidential or that you do not want published, you can say this in your submission.

The Privacy Act 2020 applies to your submission. Any personal information you supply to MBIE through your submission will only be used by MBIE for the purpose of producing a summary of submissions. The summary will present themes and no personally identifiable information will be included. The summary will be reported to the Minister of Tourism and be published online.

Submissions may be subject to requests for information under the Official Information Act 1982 (OIA). If your submission, or part of it, comes within the scope of an OIA request, MBIE would normally release it (excluding any personal information) to the person who asks for it. If you consider there are reasons for MBIE to withhold any of the information you are providing, please indicate these reasons in your submission.

## Your details

**What is the name of the person making this submission?**

Mayor Tim King

**If you are submitting on behalf of an organisation, what is the name of that organisation?**

Tasman District Council

**Is it okay for your organisation's details to be published if we publish which organisations made a submission, or include part of your submission in the summary of submissions?**

- Yes, you can publish my organisation's details with information from my submission.  
 No, keep my organisation's details confidential.

**Can we use information in your submission as a case study in the summary of submissions?**

- Yes, you can include information from my submission as a case study in the summary of submissions.  
 No, keep my information confidential.

**Please provide us with your email address in case we need to contact you about your submission.**

Email

tim.king@tasman.govt.nz

**What sector(s) does your submission most closely relate to, if applicable?**

For example, the sector in which you may work or operate, or which you represent.

- |  |  |
|--|--|
| <input type="checkbox"/> Accommodation provider          | <input type="checkbox"/> Other tourism business                        |
| <input type="checkbox"/> Rental vehicle business         | <input type="checkbox"/> Non-tourism business                          |
| <input type="checkbox"/> Iwi, hapū or Māori organisation | <input checked="" type="checkbox"/> Local Government                   |
| <input type="checkbox"/> Individual or camper            | <input type="checkbox"/> Club or club representative (eg camping club) |
| <input type="checkbox"/> Other _____ (please specify)    |  |
| <input type="checkbox"/> N/A                             |  |

## Introduction and who we are/our role in Freedom Camping

The Council welcomes the Minister of Tourism's initiative to further consider the regulatory regime for managing freedom camping.

Tasman District Council is one of the busiest regions in New Zealand for freedom camping. In addition to tourism the region also attracts large numbers of itinerant workers to service its horticultural businesses.

Council's roles with regards responsible camping include:

- Provider of camping sites – provider of land that is accessible for freedom camping in self-contained vehicles, provider of selected sites where freedom camping in non-self-contained vehicles and tents is permitted along with suitable toilet and rubbish disposal facilities; and provider of commercial campgrounds.
- Regulator of freedom camping – through the Freedom Camping Bylaw and application of the Reserves Act through reserve management plans.
- Enforcement and compliance of regulations on Council land.
- Provider of information on responsible camping – in hardcopy and digital forms and in recent years through the employment of Responsible Camping Ambassadors<sup>1</sup>.

The Council has accessed both the Tourism Infrastructure Fund and Responsible Camping Fund to assist its work in providing for and managing responsible camping in the District in recent years.

In April 2020 the Council adopted a Responsible Camping Strategy to provide strategic direction to Council's approach to freedom and other types of camping. The Council's responsible camping strategy is available at the following link [Responsible Camping Strategy | Tasman District Council](#).

Tasman District Council introduced its first Freedom Camping Bylaw in 2013. The Council's bylaw is available at the following link [Freedom camping bylaw | Tasman District Council](#). The Bylaw was last reviewed in 2020 with amendments being made to add further restrictions by removing the use of two areas in Golden Bay, one area in Motueka and reducing the availability of spaces in an area in Ngātīmoti.

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<sup>1</sup> Funded through the Responsible Camping Fund.

## Context to Supporting Sustainable Freedom Camping in Aotearoa New Zealand

### 1.1 How much do you agree that certain types of vehicle-based freedom camping is a problem?

1.1

Please write a (Y) next to the option which applies to you

Strongly agree Y	Agree	Neutral	Disagree	Strongly disagree
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### 1.2 What are your views on freedom camping in vehicles?

When answering this question you may like to think about:

1.2

- Is vehicle-based freedom camping an issue in your area?
- Have you observed any specific issues?
- Are there specific behaviours which impact on your use of local amenities/infrastructure?
- What benefits does vehicle-based freedom camping provide for your region?

With the increase in freedom campers in recent years, there has been an adverse reaction from some members of the Tasman community resulting from perceptions, or actual experiences, of:

- littering and dumping rubbish
- human waste left on site
- late night noise
- conflict with other users or other users feeling excluded from public spaces by the presence and large numbers of freedom campers
- safety concerns
- competition with commercial campgrounds
- loss of visual amenity
- lighting of fires
- disturbance of wildlife
- pollution of rivers.

Date range	Number of Freedom Camping Infringements Issued
01/11/2017 – 31/10/2018	121
01/11/2018 – 31/10/2019	230
01/11/2019 – 31/10/2020	137
01/11/2020 – To Date (19/04/2021)	155

In addition to issues that take place on Council land, unauthorised freedom camping in vehicles frequently takes place on other public land (eg DOC, LINZ, NZTA) or private land and can generate a number of problems for those landowners or the wider community. As Council is unable to issue infringement notices in these situations, their prevalence is not reflected in the figures provided above.

There are a number of benefits for the Tasman District from freedom camping in vehicles including providing opportunities for visitors to experience our District and some spending which supports local

businesses. In addition, it provides an avenue for housing itinerant seasonal workers required to support our rural productive industries when accommodation is not provided by their employers.

**2.1 How much do you support the proposal to make it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle?**

Please write a (Y) next to the option which applies to you

Strongly agree Y	Agree	Neutral	Disagree	Strongly disagree
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**Do you support this proposal?**

When answering this question you may like to think about:

2.2

- Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

Council’s management approach in its Responsible Camping Strategy is *to restrict freedom camping to certified self-contained vehicles only, in so far as is legally permissible ...*

In determining its strategic direction on responsible camping the Council was in favour of restricting freedom camping to self-contained vehicles only. The statement from the Strategy includes reference to legal permissibility. The Freedom Camping Act, by virtue of how freedom camping is defined, limits the Council’s ability to introduce a District-wide restriction on freedom camping to self-contained vehicles only.

Overall the Council strongly supports this proposal but acknowledges that much will be needed to ensure it can work effectively and not have unintended consequences.

We believe that this option will have some impact on decreasing pressure on the environment around Council land that is used for freedom camping by reducing the number of any freedom campers who choose to wash or toilet outdoors in unhygienic and environmentally damaging ways. We acknowledge that on some occasions freedom campers in self-contained vehicles may still choose to wash and/or toilet outdoors, however we consider that requiring freedom campers to use self-contained vehicles will reduce the potential for unhygienic toileting activity overall.

One important advantage of making it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle on a nationwide basis, is consistency. The messaging to freedom campers will be very simple, can be much clearer than at present, and be consistent. The rule will be the same across the country and those freedom campers intending to comply with the regulations will no longer have to check local rules in this regard as they travel around the country.

One unintended consequence of making it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle is that there may be an increase in freedom camping in non-self-contained vehicles at unauthorised locations without toilets provided, including on private land. This may lead to an increase in unhygienic toileting in the outdoors at these locations and add other risks through unauthorised fires. The Minister’s proposal cannot easily stop the resale of non-self-contained vans or cars and if these types of vehicles continue to be exchanged, the challenge shifts to one of enforcement.

In summer 2020/2021 Tasman District Council closed two of the sites in Golden Bay and one in Motueka that provided for freedom camping in non-self-contained vehicles, leaving only a very small number of spaces for this activity across the District. Our experience has been a significant increase in unauthorised freedom camping in non-self-contained vehicles, despite the very limited number of overseas visitors in

the area. The number of areas where people have been found camping illegally has increased by at least 300%.

Another potential consequence of making it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle is that those freedom camping in non-self-contained vehicles may take greater measures not to be detected in unauthorised locations. This may mean people take vehicles further from roads and houses to freedom camp at unauthorised locations to avoid being noticed. This is an effect that we have noted in Golden Bay during summer 2020/2021.

Making it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle may encourage more campers with non-self-contained vehicles to use camping grounds. This will help maintain the financial sustainability of these businesses and help ensure their availability in key locations is retained.

However, at the peak of summer the commercial campgrounds at the most popular locations in the Tasman can be full and not have enough available spaces to meet demand. In this period the proposal could result in an increase in freedom camping in unauthorised locations, both public and private land, as people in non-self-contained vehicles try to find somewhere to camp.

The proposal could also negatively affect whitebaiters who use non-self-contained vehicles and other people who camp in public places mainly out of season.

This proposal, if enacted, will likely create a need for a significant uplift in enforcement activity. To the degree that the costs are not recovered through infringements, the cost for this will be borne by the ratepayer unless it is subsidised by the Responsible Camping Fund.

### **How might this proposal impact you?**

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?
- 2.3 • Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

### **What things should Government consider to implement this option?**

When answering this question you may like to think about:

- 2.4 • What exceptions should Government allow under this proposal?
- Do you have any ideas about how this proposal could be implemented?
- Should this option be considered alongside other options proposed in this discussion document?

This option should be considered alongside a stronger infringement regime, a regulatory system for registering self-contained vehicles and strengthening the requirements for self-contained vehicles.

**How much do you support the proposal to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at a site with toilet facilities (excluding public conservation lands and regional parks)?**

3.1

Please write a (Y) next to the option which applies to you

Strongly agree	Agree Y	Neutral	Disagree	Strongly disagree
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**Do you support this proposal?**

When answering this question you may like to think about:

- Do you consider this option will improve camper behaviour?
- 3.2 • Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

The Council’s preferred position is making it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle. However, if that option is not adopted then the Council supports making it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at an approved site with toilet facilities.

This approach would make little impact on the sites where authorised freedom camping in non-self-contained freedom camping can take place in the Tasman District. Under the Council’s Freedom Camping Bylaw the only Council locations where freedom camping in non-self-contained vehicles is permitted are locations where toilets are provided.

However, a change in the legislation to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at a site with toilet facilities, would be welcomed. Changing the legislation in this way would mean that the Council would not have to justify restricting freedom camping to only self-contained vehicles at Council locations based on the criteria in the Freedom Camping Act i.e. that it is necessary to protect the area, protect the health and safety of people who may visit the area or to protect access to the area. It would similarly mean that the Council would no longer be open to legal challenge on its decisions to restrict the types of vehicles that are able to use some locations. A significant advantage of this proposal is having a consistent set of rules across the country which should be more straightforward to communicate and easy for freedom campers to understand.

It is unclear in the discussion document why the proposal is to exclude public conservation lands and regional parks from this proposed restriction. It is hard to fathom why people would be allowed to freedom camp in non-self-contained vehicles in places with no toilet in these areas if it is prohibited elsewhere.

The Council supports freedom camping in tents being covered by this regulation, if it was to be introduced. The impact on the environment of freedom campers in tents toileting in the outdoors is no different from the impact of freedom campers in vehicles doing the same thing. The only grounds we can see for not including freedom camping in tents from this proposal is the lower number of freedom campers using tents compared with those using vehicles meaning that cumulatively they have less impact.

Similar to our response in 2.2, introducing this regulation could have the unintended consequence of greater levels of freedom camping in non-self-contained vehicles taking place in unauthorised locations.

**How might this proposal impact you?**

3.3

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?
- Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

It would be expected that more effort by the Council will be required to deal with non-compliance. This is not straight forward as you have to be able to catch people in the act of camping, which is different to simply parking for a time. Any regulation should make it easy for enforcement officers to be able to establish an intent to camp.

### What things should Government consider to implement this option?

When answering this question you may like to think about:

- What do you think is required to achieve this option?
- 3.4 • What exceptions should Government allow under this proposal?
- How far from toilet facilities should a person be able to freedom camp if not in a vehicle with a toilet? eg, 100 metres, 200 metres?
- Should this option be considered alongside other options proposed in this discussion document?

This option should be considered alongside a stronger infringement regime, a regulatory system for registering self-contained vehicles and strengthening the requirements for self-contained vehicles.

Council has worked on a maximum distance from a toilet of 100 metres when providing toilets for freedom campers.

### How much do you support the proposals to improve the regulatory tools for government land managers?

4.1

Please write a (Y) next to the option which applies to you

Strongly agree	Agree Y	Neutral	Disagree	Strongly disagree
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### Do you support this proposal?

When answering this question you may like to think about:

- Are there any specific parts of this proposal you support or propose?
- 4.2 • Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

The Council strongly agrees with the proposal for a stronger infringement scheme and a regulatory system for self-contained vehicles. It sees some benefits from allowing local councils to enforce rules on other government owned land but has concerns about the costs. The Council does not support extending the

ability to confiscate vehicles. We already experience hostility towards those involved in enforcement by some campers.

**Stronger infringement regime.**

The Council strongly supports having an effective deterrent to illegal freedom camping or illegal freedom camping behaviours. It strongly supports a stronger infringement scheme as a disincentive for freedom campers to contravene the regulations and to be able to take action against those that behave illegally.

To the extent that higher infringement fees get paid, there could be an increased contribution to the Council’s revenue. However, it is very unlikely that infringement fees would ever come close to funding the full cost of the enforcement and compliance activity.

The Council supports the Act being amended to ensure those who rent vehicles are held responsible for the actions of their customers if any infringement fees are not paid. In general, freedom campers in rented vehicles tend to be only approximately 25% of the freedom campers whose actions cause problems in Tasman, with the remaining three quarters being from people with their own vehicles. In summer 2020/2021 only 4.4% of infringements were issued to rental vehicles, so freedom campers in hired vehicles are a small part of the problem.

The campervan vehicle companies have an effective means of ensuring that vehicle hirers pay any road traffic infringement fees and the Act should be amended to require the vehicle hire companies to ensure that those renting vehicles pay their freedom camping infringement fees in a similar manner.

Date range	Number of Freedom Camping Infringements Issued	Paid	Cancelled	In Process or at Court
01/11/2020 – To Date (19/04/2021)	155*	68	15	72

*\*One Infringement was issued for obstruction, the rest were for being in a place prohibited by the bylaw.*

**Regulatory system for self-contained vehicles**

The Council strongly supports the introduction of an effective regulatory system for self-contained vehicles. Ensuring that those vehicles purporting to be self-contained actually meet the standards is important for the existing regulatory regime through bylaws and to support the proposals in the discussion document. It would also reduce the enforcement and compliance load for Councils.

It is important that those carrying out the certification are licensed and can be held accountable for issuing certificates to vehicles that do not meet the standards. Council enforcement staff and contractors being able to view a register of complying vehicles to confirm whether or not a vehicle is self-contained would be extremely helpful. Council Parking Warders currently have these arrangements in relation to vehicle registration generally.

**Vehicle Confiscation**

The Council does not support the idea of increasing the grounds on which vehicles can be confiscated for persistently offending. Vehicle confiscation is problematic and is something the Council uses very much as a last resort. Confiscating vehicles creates a range of administrative issues (e.g. storing and disposing of confiscated vehicles). It also has insurance issues regarding potential damage during removal and storage. In our experience the people who are persistent offenders tend to be people who are homeless and

confiscating their vehicles would increase the hardship on these individuals and be something the Council would be very reluctant to do.

### **Allowing local councils to enforce rules on other government owned land**

The lack of freedom camping enforcement on Government owned land is an issue in the Tasman District. The Council acknowledges that the limited coverage of the Act makes it harder for some government agencies to control freedom camping on their land, however, the Department of Conservation has the power, but conducts very little freedom camping enforcement on its land in the Tasman District. In the Council's view broadening the coverage of the Act to other Government land would be a good first step. In addition the agencies administering the land also need to demonstrate some responsibility and commitment to managing freedom camping on their land. Alternatively, they could pay council to monitor their land at agreed frequencies. This would have implications relating to warranting of enforcement staff for the different agencies.

The Council sees some clear benefits of allowing local authorities to act as enforcement agents on land administered by Waka Kotahi or other Crown owned land. This would mean that there would be some enforcement for some types of Government owned land (i.e. there isn't any currently) and a much more consistent approach to enforcement across a range of public land. The public generally does not make a distinction between the different owners of public land across both the Crown and Local Government and expect Council staff to be able to act to enforce freedom camping rules on Crown land. The proposal would also avoid enforcement on Council land, merely pushing the activity to nearby Crown owned land.

For this proposal to be effective in Tasman it is important that Central Government land administered by LINZ be included, as many of the areas where freedom camping issues take place are on this type of land.

The Council considers that it and its contractors are well placed to carry out freedom camping enforcement on Crown land in the Tasman District. Our enforcement officers know the area well, are out and about in the District, and there would be significant synergies in the same staff undertaking enforcement on both central and local government land in a joined up manner.

The Council has concern about the costs of undertaking freedom camping enforcement and compliance on Government land. As noted earlier the revenue from infringement notices covers only a small proportion of the costs. The Council is grateful for the financial support for increased enforcement and compliance on Council land it has received from Central Government through the Responsible Camping Fund in recent years. However a significant proportion of the costs are funded by ratepayers.

If the Council is to undertake freedom camping enforcement work on Crown land it considers that there should be an appropriate level of funding from Government to pay for that service. The Council already has significant pressure on rates. The Council is experiencing significant community pressure to manage rates increases at reasonable levels and is anticipating this being a feature of submissions on its LTP consultation document. The Council accepts that the ratepayers and tax payers of the Tasman District are generally the same people, however it considers that funding for freedom camping enforcement on Central Government land should be funded through the Government's funding sources and not impact rates. If the Council is undertaking enforcement activities on Central Government land, agreements could be made with other crown agencies for crediting a proportion of any fines received for offences on their land against the cost of enforcing as an agent.

### **How might this proposal impact you?**

4.3 When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?

- Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

**What things should Government consider to implement this option?**

When answering this question you may like to think about:

4.4

- What would you like to see in practice?
- Should this option be considered alongside other options proposed in this discussion document?

The Council would like to see people coming to our district to camp act in a responsible way.

**What would be an appropriate penalty?**

When answering this question you may like to think about:

4.5

- Should non-compliant vehicles be confiscated? If so, under what conditions?
- If vehicles are confiscated, what conditions should be placed on returning the vehicle?
- Should fines be similar to those for not holding a valid Warrant of Fitness for a motor vehicle?
- What levels should fines be set at?
- Who should collect a fine?

If the maximum fine is to be increased to \$1,000 as has been indicated, it is likely that there will be more resistance to paying the fine and greater efforts to avoid being caught e.g. camping in remote areas, which potentially brings a greater risk of fires etc.

We consider that the collection of fines as per the Summary Offences Act procedures is appropriate.

**Do you think that the requirements for self-containment should be strengthened?**

5.1

Please write a (Y) next to the option which applies to you

Yes Y

Neutral

No

**Is the current standard fit for purpose?**

When answering this question you may like to think about:

5.2

- Should there be a requirement that self-contained vehicles have fixed toilets?
- Should there be specific reference to the types of vehicles that can be self-contained?

The Council considers that self-contained vehicles should have fixed toilets as a way of ensuring that the toilets are actually useable even if the beds are down. As noted in the discussion document there are currently a number of vehicles certified as self-contained where the toilet is not useable.

5.3

**Who should certify to the Standard?**

When answering this question you may like to think about:

- Should any Plumber registered under the Plumbers, Gasfitters and Drainlayers Act 1976 be able to certify to the Standard, or should certifiers be separately recognised and licensed?
- Once a vehicle has passed its initial certification, should other entities be able to re-certify it?

The Council considers that the certifiers should be separately recognised and licensed. Similar to Warrant of Fitness testing it is important that those issuing certificates can be audited and be held accountable for issuing certificates to vehicles that do not meet the standards.

We believe that once a vehicle has passed its initial certification the same licensing agencies authorised to issue certificates should also be able to re-certify it. We do not see the benefit in allowing other agencies to carry out the recertifying. The recertifying workload and revenue will also be an incentive for certifiers to become licensed and retain that license.

There should also be oversight by a Central Government Ministry to ensure that appropriate standards are met. A register of all certified vehicles should be held by the Ministry and must be available for interrogation by enforcement bodies at all times.

### **What transition arrangements should be in place?**

When answering this question you may like to think about:

- 6.1
- How long should Government give people to upgrade or dispose of their vehicles?
  - Should currently certified self-contained vehicles be exempt from any new rules?
  - Are there any other transition arrangements we should consider?

The Council considers that the Government should give people two years to upgrade or dispose of their vehicles. This allows a reasonable period for people to make the change but avoids the problems around the types of toilets and current certification to remain for too long a period.

The Council does not consider that currently certified self-contained vehicles should be exempt from any new rules, following a suitable transition period. Many of these vehicles may not be used for long distances each year and consequently have long lives. To exempt them from the new rules would leave a long legacy period and potentially artificially inflate the prices of these older vehicles. In addition to the immediate freedom camping issues, providing incentives for older vehicles to remain in the fleet for longer than would otherwise be the case, is counter to the Government's policy direction on reducing greenhouse gas emissions.

We consider that a completely new form of self-containment license for display in the vehicle should be created to reduce potential for confusion.

### **How could Government ensure vulnerable groups are not further disadvantaged?**

- 6.2
- Could Government make homelessness exempt from any new regulatory system? What might this look like?

In order to consider exempting homeless people from the regulatory system, a clear definition of homelessness would need to be determined. To illustrate the point, in addition to those who have no real option but to live in a vehicle, we are aware of people who choose to live in campervans or even tents. There are people choosing to live permanently in campervans with no other dwelling. In many cases these people have no other home. Would these people be considered homeless?

The Council's enforcement staff do come across homeless people freedom camping in the District and apply a discretionary approach when enforcing the regulations with these people. Adopting a discretionary

approach to enforcement may be an alternative approach to exempting homeless people from any new regulatory system.

Homelessness is a complex and multifaceted issue that needs a comprehensive Government led approach. The question of whether or not homeless people should be exempt from a new regulatory systems for freedom camping is one minor consideration in a large issue.

#### 7.1 **Is there anything else on the proposed changes or discussion document you would like to mention?**

The Council is concerned the scope of the review did not address a consistency of outcomes between the Camping Ground Regulations and the proposed freedom camping changes. The Regulations require operators to ensure there is a safe distance between sites to manage fire risk, and there are also minimum standards concerning potable water and waste water. Except for the self-contained certificate (which we support provided it is authentic and reliable), the freedom camping changes do not properly manage expectations on how freedom camping is conducted.

The Council is concerned about the fire risk from freedom campers camping in very close proximity to one another. In Tasman we have experienced situations in which multiple freedom campers have parked their vehicles for camping purposes very close (sometimes no more than a few centimetres) from one another. Given that many of these campers use open flame stoves of one sort or another we are concerned about the risk of fire being spread rapidly through multiple freedom camping vehicles, with the associated risk of injuries or potentially death. The Council requests that the Minister gives this issue some careful consideration and suggests that he introduce some appropriate measures to mitigate this safety issue. The Council has very much appreciated the Government funding provided through the Responsible Camping Fund in recent years. This has made a significant contribution to our ability to manage freedom camping over recent years to the benefit of both freedom campers and local people. The funding of the freedom camping ambassadors has been particularly helpful. They have played an important complementary role to our enforcement and compliance. Continued Government funding remains vital to the continuation of the freedom camping ambassadors programme in the Tasman District. With strong pressure on our budgets (partially as a result of increasing costs to meet national regulation promulgated by Government) and community resistance to higher rates rises, we have not been able to budget to provide a freedom camping ambassador service in our Long Term Plan 2021-2031. Without continued Government funding, regrettably this service is likely to be discontinued to the detriment on residents and visitors in Tasman and is likely to further undermine the social licence for freedom campers.