

Proposed Christchurch City Council Freedom Camping Bylaw 2015

Submission of Rod Donald Banks Peninsula Trust

Submitter Details:

Postal Address: Rod Donald Banks Peninsula Trust
PO Box 5
Little River, 7591

Email Address: suky@roddonaldtrust.co.nz

Phone Number: 03-304-7733

Contact Person: Suky Thompson, Trust Manager

Please share your views with us by ticking the relevant boxes:

Yes – I/We generally support the proposed bylaw No – I/We do not generally support the proposed bylaw

My submission is mostly concerned with the following areas:

- | | |
|---|---|
| <input type="checkbox"/> Akaroa | <input type="checkbox"/> Addington |
| <input type="checkbox"/> Birdlings Flat | <input type="checkbox"/> Christchurch central city |
| <input type="checkbox"/> Diamond Harbour | <input type="checkbox"/> Christchurch city residential zone |
| <input type="checkbox"/> Duvauchelle | <input type="checkbox"/> Lower Styx River mouth |
| <input type="checkbox"/> French Farm | <input type="checkbox"/> New Brighton, North Ramp |
| <input type="checkbox"/> Governors Bay | <input type="checkbox"/> Windsport Park (Ferryroad) |
| <input type="checkbox"/> Koukourarata/Port Levy | <input type="checkbox"/> ALL OF THE ABOVE |
| <input type="checkbox"/> Little River | |
| <input type="checkbox"/> Lyttleton | |
| <input type="checkbox"/> Onawe | |
| <input type="checkbox"/> Onuku | |
| <input type="checkbox"/> Takamatua | |
| <input type="checkbox"/> Wainui | <input checked="" type="checkbox"/> Banks Peninsula |

My submission is mostly concerned with:

- Self-contained freedom camping (vehicles with on board wastewater facilities)
- Non self-contained freedom camping (tents and other vehicles)
- All forms of freedom camping

Freedom camping should be permitted in specified areas for:

- Up to three days in a 30-day period
- Up to five days in a 30-day period
- Other timeframe (please specify)

I wish to speak to the Hearings Panel about my submission.

in person via videolink

Executive summary

The Rod Donald Banks Peninsula Trust supports recreational amenity on Banks Peninsula that is consistent with the sustainable management of the environment, respects the culture of the area and is of benefit to its residents and visitors. Retaining and increasing coastal camping for Christchurch families is high on the Trust's list of priorities. The Trust recognises the benefits that well-managed tourism brings to the area, and urges the Council to support the local community and private enterprise to provide more low-cost well-managed, appropriately sited and environmentally sustainable campgrounds on Banks Peninsula.

The Trust's submission on the proposed Freedom Camping Bylaw applies to its area of interest - the Lyttelton/Mt. Herbert and Akaroa/Wairewa wards of Christchurch City only.

The Trust does *not generally support the provisions* for this area as proposed in the draft Freedom Camping Bylaw. It considers that the Council has underestimated the impact that increased freedom camping is having on the environment, amenity, cultural sites and community well-being of Banks Peninsula, and has failed to sufficiently differentiate between the post-earthquake issues in the City and the exclusively tourism based issues experienced on Banks Peninsula. Hence rather than solve the problems with freedom camping on Banks Peninsula, it will merely serve to shift them from one place to another, may exacerbate issues in some places and hinder the development of the well-managed low cost campgrounds that the Trust seeks. Furthermore, the proposed bylaw is out of line with bylaws implemented by other councils administering similar tourism areas of high natural value, leaving Banks Peninsula increasingly vulnerable as competing areas become more restrictive.

The Trust seeks that the Council exercise the powers at its disposal under the Freedom Camping Act 2011 or the Local Government Act 2002 to implement the following additional restrictions into the bylaw in the Banks Peninsula wards:

- Restrict Freedom Camping throughout Banks Peninsula (excluding prohibited areas) to self-contained vehicles only and require non-self-contained vehicles to use campgrounds.
- Explicitly require self-contained vehicles to have interior cooking facilities and a minimum grey and black water storage available to contain two days of waste for the number of vehicle occupants when freedom camping;
- Prohibit Freedom Camping in all urban areas and small settlement areas;
- Prohibit Freedom Camping within 100m of any rural residence, accommodation business, campground or site of cultural significance and within 20m of the coast or any waterway;
- Limit the number of vehicles per location to a maximum of 2;
- Limit the number of consecutive nights a vehicle can stay in a single location to 2 nights, with no return to within 1km of the original site;
- Explicitly require any disposal of sewage or rubbish to be in Council approved facilities and prohibit campfires, to protect the environment.
- Keep the bylaw simple with very clear rules and maps to minimise the need for signage and to maximise clarity of visitor information and local knowledge to facilitate compliance and enforcement.

The Trust submits that by combining such restrictions with the provision of additional low-cost, simple campgrounds on Banks Peninsula the Council would facilitate sustainable tourism for the benefit of the area's residents, protect the health and safety of people visiting the area and protect access to the places of high natural character. Such measures would be consistent with those implemented by other rural tourism districts in the South Island while still enabling Freedom Camping for those who have chosen to equip themselves appropriately in keeping with the NZ Bill of Rights.

The Trust wishes to be heard in support of its submission.

1 Introduction

The Rod Donald Banks Peninsula Trust (Trust) is a charitable trust founded by the Christchurch City Council in 2010 for the benefit of the present and future inhabitants of Banks Peninsula and for visitors to the area.

The Trust's activities focus on the area formerly administered by the Banks Peninsula District Council, currently comprised of the Akaroa/Wairewa and Lyttelton/Mt Herbert Wards (Banks Peninsula).

The Trust seeks to work in partnership with other organisations to achieve its objectives and to align activities with the projects and initiatives of Christchurch City Council.

Principle objectives of the Trust include:

- To promote sustainable management and conservation (consistent with the purposes and principles of the Resource Management Act 1991 and the Conservation Act 1987 and any replacement legislation) of the natural environment in the Region;
- To establish, support or facilitate environmental based projects that are focussed on:
 - the maintenance and development of recreation facilities including parks, reserves,
 - walkways and affordable camping grounds in the Region;
 - providing public access to recreation facilities including parks,
 - reserves, walkways and affordable camping grounds in the Region;
 - the reinstatement and preservation of native vegetation in the Region;
 - the enhancement of the natural biodiversity of the Region;
 - the restoration of the Region's waterways to their natural state; and,
 - the protection of native endangered species present in the Region
- To establish, support or facilitate projects that are focussed on the protection, preservation and enhancement of areas of historical or cultural significance or the built heritage of the region.

In the five years since its inception, the Trust has initiated a raft of projects to support these objectives, supported by four pillars of access, biodiversity, knowledge and partnership. In the process it has gained extensive experience with the policy and regulatory framework that it must work within.

In this submission the Trust presents further information on its work involved with affordable campgrounds, briefly reviews relevant legislation that such campgrounds need to comply with, describes some of the issues experienced on Banks Peninsula with Freedom Camping, presents a review of how rural tourism districts elsewhere have legislated to control Freedom Camping and gives consideration as to how the new bylaw can be framed to cope with a fast-moving environment. The submission concludes with a list of additional measures sought in the Freedom Camping bylaw as it applies to the Banks Peninsula area, and gives reasons within the context of the Trust's objectives and its research and reflections.

2 Projects to support affordable campgrounds

In its consideration of affordable camping, the Trust has considered options and identified that its interest is in DOC, or DOC type low-key low cost campgrounds. It has identified that despite the proximity of Banks Peninsula to Christchurch City there is a lack of these facilities on Banks Peninsula and there is a need to fill the gap and provide this type of very basic, simple campsite aimed at Kiwis.

To date the Trust has worked with one community organisation that is now providing increased affordable camping, and has several other projects in progress.

2.1 Orton Bradley Park camping

The Trust has worked with and given annual grant funding to Orton Bradley Park. This has enabled the Park to progress the development of well-managed affordable camping within the park grounds, extending the use of its school based Outdoor Recreation Centre into the school holidays and to improve its ongoing financial viability and sustainability. The Park now provides camping both for tents and for campervans in manner compliant with relevant legislation.

2.2 Projects in progress

The Trust is also seeking to provide or encourage low cost affordable camping on its own properties, at 562 Western Valley Road, and at the Panama Reserve in Le Bons Bay. The Trust is also keen to promote low cost camping in the former Le Bons Bay school grounds which the local community seeks to develop into an environment centre and in support of this project.

However, the Trust is aware that in all these cases where low key camping is to be developed on private land, property owners, be they community groups or private operators, must comply with legislation designed to protect the environment, health and safety of visitors and the amenity of the area.

The Trust is shortly to open a low cost public tramping hut on its property at 562 Western Valley Road. This has been upgraded to meet the back-country serviced hut compliant with Department of Conservation standards. The Trust was required to obtain a resource consent for the activity, which was deemed non-complying with the District Plan and provides accommodation for up to 9 overnight trampers in an existing small building. The Trust has made every effort to determine the potential environmental effects associated with having trampers for overnight stays have been mitigated. Fire has been identified as the highest risk with transient visitors staying in this environment. Hence the Trust has gone to the expense of providing over 20,000 litres of on-site water storage, banning all fires outside, providing fire hoses and fire extinguishers. Camping is considered to exacerbate this risk, and hence to date the Trust has not actively provided any camping areas around its hut.

3 Relevant legislation protecting the area from effects of camping

In the course of its work, the Trust has researched the legislation applying to camping and to recreational activity provision in the Peninsula environment. It is therefore aware of relevant legislation designed to control the effects of camping on private land, and the threshold usage levels at which it becomes applicable.

3.1 Camping-Grounds Regulations 1985

The Camping-Grounds Regulations come into force when any area of land is used by two or more families or parties for temporary living in caravans, vehicles or tents for reward of any size, including donations. Under these regulations the camping grounds must:

- hold a certificate of registration and comply with health regulations
- keep records of who is staying
- have the sites marked including boundaries
- is subject to a minimum size of 53m²
- provide a water supply including hot water, ablution and toilets, refuse disposal, cooking places, laundry facilities, drainage.

A private operator or a community organisation that wished to accommodate more than two campervans for any level of remuneration would be required to provide these facilities. The local authority has the ability to waive some details of the Regulations.

3.2 District Plan

The Banks Peninsula and the proposed replacement District Plan both include policies to protect the character of the Peninsula landscape, particularly its coastal areas and areas of outstanding natural

value. These include provisions to avoid development that would diminish or compromise natural character, avoid inappropriate development in locations of special significance to tangata whenua, require setbacks from use and development of riparian and coastal margins, ensure development is not readily visible from public places and frequently used viewpoints and maintain or enhance water quality.

Under the proposed District Plan, use of land for the purpose of camping would fall under the definition of Guest Accommodation. In the rural zone or residential any guest accommodation catering for more than 6 people is a discretionary activity and would require a resource consent to take into account the effects on the environment.

4 Freedom camping issues on Banks Peninsula

The following issues with Freedom Camping have come to the attention of the Trust as it has worked in the field of recreation and interacted with the local community, community groups, businesses and residents.

- Freedom campers defecating and littering in public places. This includes the concern that – some self-contained campervan users do not use the on-board toilets because campervan companies charge an additional fee if they have been used on return of the vehicle. Some campers empty tanks when they are full discharging grey or black water into the environment.
- Freedom campers using public facilities inappropriately and leaving a mess behind when public toilets are used for dish washing, laundry and body washing which they are not intended for.
- Abusing facilities in campgrounds (mainly run by reserve committees on public land), including staying overnight outside and using their facilities without paying
- Wet wipes from Freedom camping tanks blocking up the sewage pipes in campgrounds when their sewage disposal systems are used
- Concern over increasing disposal of sewage containing bacterial inhibitors from campervan tanks
- Concern over the fire risk from cooking outside or campfires, given that Banks Peninsula is very dry in summer.
- Occupying prime public space such as waterfronts effectively precluding access for other users.
- Historic townships of Lyttelton and Akaroa have narrow streets and large self-contained campervans detract from the views, character and amenity of the towns.
- Detracting from the natural character and amenity of coastal areas, areas of natural character and areas of heritage character and residential areas
- Camping on or near sites of cultural significance to tangata whenau

There is a widespread concern that unrestricted freedom camping is:

- Effective privatisation of public space as most campervans belong to rental companies who are charging a fee for their use
- Degrading the environment and socialising the cost of providing services to support freedom camping to the ratepayers while profits from overnight rental fees are externalised from the area
- Undermining the ability of community groups or private operators to provide affordable well-managed camping as they must comply with legislation to mitigate effects to protect the environment, provide expensive facilities and pay rates putting them at an unfair

disadvantage compared with freedom camping opportunities exploited by companies from outside the area.

5 Legislative controls in other tourism districts

Banks Peninsula is not alone in experiencing these issues with Freedom Camping. Similar problems are experienced in many rural tourism areas with high natural character values. The Trust has therefore reviewed the bylaws put in place in other areas to guide it in determining its submission. ***A summary of South Island Councils in high tourism areas who appear to have an operative bylaw is given in Appendix A to illustrate other solutions to managing this issue.***

5.1 Controls on non-self-contained vehicles

The majority of Councils who have implemented a freedom camping bylaw have elected to restrict freedom camping to self-contained vehicles only and require non-self-contained vehicles to use campgrounds. These by-laws have been enacted since the Freedom Camping Act 2011 and remain extant.

5.2 Restrictions on self-contained vehicles

Most Councils have then imposed further restrictions on self-contained vehicles. These include:

5.2.1 Length of Stay

The majority of Councils have imposed a 2 night restriction on self-contained Freedom Camping, with various controls such as no return to the same place within a month. Tasman District has made it clear that freedom campers must move to at least 1km from their original site.

5.2.2 Density

Dunedin Council has controlled the density to no more than 3 campervans within a 50m radius.

Marlborough has limits on vehicle numbers in certain hot spot areas.

Mackenzie has prohibited freedom camping at hot spots during the summer peak.

5.2.3 Disposal of sewage and rubbish and control of fires.

In addition most bylaws include additional requirements to require disposal of sewage and waste at Council approved facilities.

Queenstown Lakes require vans to meet the ablutionary needs of occupiers for a minimum of 3 days.

Several councils prohibit open fires.

5.2.4 Urban and residential areas

Two Councils have prohibited camping in all urban areas.

Hurunui had prohibited freedom camping near accommodation facilities (but its bylaw may not be currently operative).

5.2.5 High Natural Character areas

Most Councils have prohibited camping from areas of high natural character – for instance Marlborough has prohibited all camping along the Queen Charlotte and Keneperu Sounds and many waterfront reserves. Tasman has prohibited freedom camping in all council reserves except road reserve.

5.2.6 Ngāi Tahu Settlement Act

Some bylaws recognise the right to nōhanga campsites afforded in the Ngāi Tahu Settlement Act 1998. This would not apply to Banks Peninsula as there are no such campsites identified, but there

are many areas of cultural sensitivity in this historically rich place.

5.3 Fines

Some Councils have imposed higher fines than the \$200 provided for in the Freedom Camping Act. These Council's appear to have framed their bylaws also referring to the Local Government Act and have the ability to issue fines of up to \$20,000.

5.4 Comparison of other Council's with proposed Christchurch bylaw

The conclusion from this review of other bylaws is that most of the other rural districts with high natural character values attracting large numbers of tourists have chosen to take a much more restrictive approach to freedom camping than the proposed Christchurch bylaw. The Trust assumes that this is in part because Christchurch City Council is also attempting to cater for post-earthquake homeless people and rebuild workers. However, it does not appear to have distinguished in its regulatory approach that Banks Peninsula is not subject to these pressures, and that the issues it is facing are much more akin to those in areas such as Queenstown Lakes, Tasman and Marlborough.

6 Robustness of bylaw

The freedom camping industry has developed very rapidly over the past 10 years. This may be due in part to a lack of regulation across New Zealand, which has allowed a rental industry to flourish through the use of public space and externalising the costs of such use onto ratepayers. It may also be in part due to the rapid communication now available via internet and social media enabling campers to blog and post about new freedom camping areas and sites.

A concern of the Trust is that the Freedom Camping bylaw needs to be sufficiently broad and robust that it can cope with changing issues and demands in a rapidly moving environment, and does not leave Banks Peninsula vulnerable as other districts bring in more controls. The bylaw needs to be sufficiently comprehensive and wide reaching to avoid becoming rapidly out of date.

6.1 Potential scenarios under proposed bylaw

The approach taken by the proposed Christchurch bylaw to Banks Peninsula is to impose prohibitions on a very few areas, and restrictions on a few of the current hot-spots, while leaving the vast majority of the area open to freedom camping in either self-contained or non-self-contained vehicles with no time limits. Various undesirable scenarios are quite possible under this approach:

- Existing Freedom Camping hot spots such as French Farm or Wainui could become increasingly crowded because the Council has given itself no ability to limit numbers or density.
- Freedom camping hot spots could easily develop in other areas of high character that are currently completely unrestricted – for example Le Bons Bay beach, or at sites of cultural significance such as Onawe.
- Freedom camping in non-self-contained vehicles can take place throughout the rural areas with no limits on length of stay or numbers. There are many residences in the rural areas that are close to rural roads with wide verges, and a hot-spot area could develop on any of these, giving residents no redress.
- Further restrictions in other districts could attract more freedom campers to Banks Peninsula under this lax regulatory approach.
- Given the ability of freedom campers to post information on social media, such changes in usage patterns could happen in a matter of days or weeks.
- Further changes to the technology of vehicles could enable campervans to drive into more sensitive areas such as beaches, dunes near waterways or onto unformed legal road areas.

The Trust recognises that a blanket ban is not permitted under the Freedom Camping Act, but

recommends that the Council takes an effects based approach consistent with the Camping Grounds Act and the District Plan to protect the area as enabled under the Freedom Camping Act. Hence the submission recommendations focus on requiring non-self-contained vehicles to use campgrounds, coastal and waterway setbacks, prohibitions in urban and residential areas, and setbacks from rural residences rather than reviewing each current hot-spot that the Council has identified in the current proposal.

6.2 Provision of clear information

The Trust seeks that the bylaw is very clear and easy to understand. The maps presented in the draft Christchurch City Council bylaw are misleading, as is the terminology used for the following reasons:

- The detailed maps do not make it clear that freedom camping is unrestricted on all Council land outside of the shaded areas. All these areas on the detailed maps should therefore be shaded mauve.
- The zone denomination of “Self-Contained Permitted” is misleading. Self-contained vehicles are permitted everywhere except prohibited zones. These zones should be labelled “Restricted to Self-contained”. (The implication for the bylaw of the Trust’s submission is that this category would be removed from Banks Peninsula with restrictions on length of stay applied to all areas only the Prohibited category retained).
- The zone denomination of “Non-Self-Contained Permitted” is also misleading. Under the current proposal, Non-self-contained vehicles are permitted everywhere except in the Prohibited and “Self-Contained Permitted” zones. These zones should be labelled “Non-Self-Contained permitted with restrictions”. (Again, the implication for the bylaw of the Trust’s submission is that this category would be entirely removed as non-self-contained freedom camping would not be permitted anywhere on Banks Peninsula).
- A mauve shading similar to the unrestricted colour is used to infill the Prohibited areas. For the avoidance of doubt red shading should be used
- The Council should develop a simple brochure such as that prepared by Queenstown Lakes District Council so that freedom campers have a good understanding of what is and is not permitted, the district remains welcoming in its approach and the natural character of the area is not despoiled with extensive signage.

7 Additional restrictions sought

In considering the above matters, the Trust seeks the following additional restrictions to be included in the Christchurch Freedom Camping bylaw as it applies to the Lyttelton/Mt. Herbert and Akaroa/Wairewa wards of Banks Peninsula:

1. **Restrict Freedom Camping throughout Banks Peninsula (excluding prohibited areas) to self-contained vehicles only and require non-self-contained vehicles to use campgrounds.**

Reasons:

- a. To protect the area from freedom campers without on-board facilities from defecating in the environment, littering, and use of public toilets as ablution blocks
- b. To maintain consistency of approach with other rural tourism areas of high natural character

2. **Explicitly require self-contained vehicles to have interior cooking facilities and a minimum grey and black water storage available to contain two days of waste for the number of vehicle occupants when freedom camping and ban outdoor campfires;**

Reasons:

- a. To ensure that self-contained vehicles freedom camping, have the capacity to contain the grey and black water waste for the entire period that they are allowed to freedom

camp and discourage discharging of full tanks into the environment. Protect the area from freedom campers without facilities from defecating in the environment, litter and use of public toilets as ablution blocks;

- b. To protect vulnerable Banks Peninsula from an increased fire risk associated with outdoor campfires.

3. Prohibit Freedom Camping in all urban areas and small settlement areas except in some areas which are identified as acceptable;

Reasons:

- a. To protect the amenity and character of the urban and residential areas for residents
- b. To maintain consistency of approach with other high volume tourism destinations
- c. To afford the same level of privacy and protection for all residential areas of Banks Peninsula regardless of whether they are towns, or smaller settlement areas
- d. To provide some areas (such as the far end of the Akaroa Recreation Ground Car park) where a sustainable amount of self-contained freedom camping is deemed acceptable by the community. The Trust has not identified such areas, further consultation or review of submission by Council would be needed to establish these.

4. Prohibit Freedom Camping within 100m of any rural residence, accommodation business, campground or site of cultural significance and within 20m of the coast or any waterway;

Reasons:

- a. To afford the same level of privacy and protection for all residents of Banks Peninsula including within the rural areas.
- b. To deter freedom campers from camping outside of other accommodation providers such as Backpacker Hostels or Campgrounds and abusing the facilities of these organisations
- c. To afford the public coastal areas of Banks Peninsula and its waterways the same level of protection from visual pollution as is provided in the District Plan.
- d. To preclude freedom camping from taking place on beaches, or too close to streams or lakes to protect water quality and the wildlife in these sensitive areas.
- e. To preclude freedom camping at sites of cultural significance to tangata whenau
- f. A blanket provision is simpler to explain and enforce than placing prohibitions on individual hot-spots and gives robustness to the bylaw if behaviour patterns change due to new spots becoming fashionable or an overall increase in demand pushing people out of the existing hot-spots.

5. Limit the number of vehicles per location to a maximum of 2;

Reasons:

- a. To limit the effects of Freedom Camping on public land to those considered as acceptable by legislation applying to private land.
- b. A private operator would need to register as a camping ground and meet the provisions of the Camping Grounds Act 1985 if more than two separate families or groups were staying on private land. It is relatively rare for there to be two or more campervans travelling together as a single group, so setting the threshold at 2 campervans per location would be the most consistent with the Camping Grounds Regulations.
- c. A private operator would need to register as guest accommodation and meet the provisions of the District Plan if more than 6 guests are accommodated. Most campervans are occupied by couples, so this would equate to 3 vans. The more conservative figure obtained from the Camping Grounds act has been used as in this

submission as it would apply to a private operator seeking to provide a campground as their Guest Accommodation.

6. Limit the number of consecutive nights a vehicle can stay in a single location to 2 nights, with no return to within 1km of the original site;

Reasons:

- a. To ensure that the Freedom Camping bylaw does not enable de-facto residence in vehicles to occur on public land.
- b. To preclude Freedom Campers from driving away for a period during the day and returning to the same location later, and parking overnight in a slightly different spot.
- c. To ensure that once a greater level of restriction is in place that there is a turn-over of Freedom Campers and ensure some fairness in the ability of all to camp in premium locations.
- d. To maintain consistency of approach with other rural tourism areas of high natural character.

7. Explicitly require any disposal of sewage or rubbish to be in Council approved facilities to protect the environment.

Reasons:

- a. To ensure Freedom Campers do not empty domestic rubbish or sewage waste into facilities provided for day visitors such as town litter bins or public toilets.
- b. To maintain consistency of approach with other rural tourism areas of high natural character.

8. Keep the bylaw simple with very clear maps and rules to minimise the need for signage and to maximise clarity of visitor information and local knowledge to facilitate compliance and enforcement. Distribute the information in an easy to understand format as widely as possible both locally and on-line.

Reasons:

- a. The bylaw as drafted is confusing and misleading, particularly the maps which do not clearly indicated what is permitted in the non-shaded areas. The maps should be improved once the bylaw is finalised.
- b. Signage explaining Freedom Camping provisions can be unwelcoming to visitors and unsightly in areas of natural or heritage character. The Trust accepts that some signage may be needed, for instance near sites of cultural significance that cannot be identified by other means, but submits that if a more consistent approach is taken by the Council across the district rather than picking on current hot-spots, then signage can be minimised
- c. Queenstown Lakes District Council produces a welcoming but very clear brochure encouraging use of its campgrounds and stating its basic rules. The Christchurch City Council should produce a similar flyer once it has established its bylaw and ensure that this is distributed to all campervan companies and local residents on Banks Peninsula so that they can assist with informing freedom campers of the rules applying here and assist with monitoring compliance.

8 Conclusion

The Rod Donald Banks Peninsula Trust is keen to promote low key recreation on Banks Peninsula that supports greater public access, enhances biodiversity, increases knowledge of the biodiversity, culture and heritage of the area and brings together different groups and organisations into partnerships in a manner that is sustainable in the long term. The Trust welcomes visitors to the

area and is very supportive of low-key camping as a way for people to interact with the environment. However, visiting the area and camping come with the responsibility to care for and contribute to that environment and the well-being of the resident population.

Freedom camping has grown enormously during the past decade, but the extent to which it has benefitted or detracted from the area has not been objectively measured. What is known is that the income from the nightly rental of campervans is not captured locally, but the costs of providing additional public facilities and the impacts on the environment and amenity are. Hence the Trust advocates that the Christchurch City Council take a similar approach to managing the issue as other Councils managing rural tourism areas, and actively works to encourage visitors to stay in established campgrounds which contribute to its ratepaying base rather than imposing additional costs on ratepayers through providing facilities to mitigate the impact of freedom camping on public land. The Trust accepts that visitors renting campervans are already paying for their accommodation, but this does not include the cost of the land they occupy. The Trust sees the solution to the issue as a combined approach of regulating and restricting freedom camping to minimise its impacts and at the same time, working with community groups and private landowners to ensure that visitors who wish to camp can do so in attractive, low-key, but well managed camping grounds.

Appendix A Bylaws in other South Island councils

District	Legal framework	Non-self-contained	Self-contained	Prohibited areas	Other rules	Fines
Buller	Freedom Camping Act 2011 30 Aug 2012	No freedom camping permitted	3 consecutive nights	List of beaches and rivermouths	Ngai Tahu Settlement act	\$20,000
Marlborough	Freedom Camping Act 2011 referenced 26 Nov 2012 and currently being amended	No freedom camping anywhere	2 nights consecutive max in one place	Main town urban areas (Blenheim, Picton, Havelock, Renwick) Queen Charlotte Drive inc verges, lookouts, roads Kenepuru Sounds roads 16 other waterfront/reserve areas	No fires Must not restrict public access Appropriate waste disposal Limits on vehicle numbers in some hot spot areas	\$200
Tasman	LGA 2002 5 Dec 2013	No freedom camping anywhere	2 nights per month in one place	All council reserves except two, apart from road reserve Within 500m of any no camping signs A few other small areas	Must move to a site at least 1km away from original site Discharge of sewage and grey water prohibited except at Council approved facility Refuse disposed of in approved refuse collection back or at station	Up to \$20,000
Queenstown Lakes	Freedom Camping Act 2011 19 Dec 2013	No freedom camping anywhere	2 nights	All urban areas Where signposted no camping	Can grant exemptions Vehicle can meet ablutionary needs of occupiers for a minimum of 3 days	\$200

MacKenzie	LGA 2002 Freedom Camping Act 2011 15 Dec 2014	No freedom camping	No time limits except certain areas	Tekapo lake front Town commercial areas Lake Ruataniwha lagoon	List of other hotspots where no camping permitted in peak summer period not within 20m of shore 7 nigh max	\$200
Dunedin	LGA 2002 1 Dec 2013	Trialled designated areas and now bringing new tougher bylaw	2 nights	Taiaroa Head Cemeteries Reserves without a permit	No more than 3 campervans within a 50m radius Ngai Tahu Settlement act	
Southland	Freedom Camping Act Draft bylaw coming into force Oct 2015	Permitted except prohibited areas 7 nights	Permitted except prohibited areas and some designated sites within these areas 7 nights	Urban zones Roads Council carparks Council boating areas Playgrounds Sports grounds Walking tracks Signposted lookouts and picnic areas	Prohibits open fires except in safe fire facility provided by Council	
Grey	8 Dec 2014	Must be 200m away from any formed legal road	3 nights in any location	2 beach areas	Wast and sewage disposal rules	
Hurunui	LGA 2002 secs 145, 146(b)(vi) Litter Act 1979 sec	No freedom camping anywhere	2 nights max per month in one place	All urban areas unless specifically permitted Within 500m of an	Toilet and greywater to be disposed of at Council approved facility All refuse at approved refuse	Up to \$20,000

12

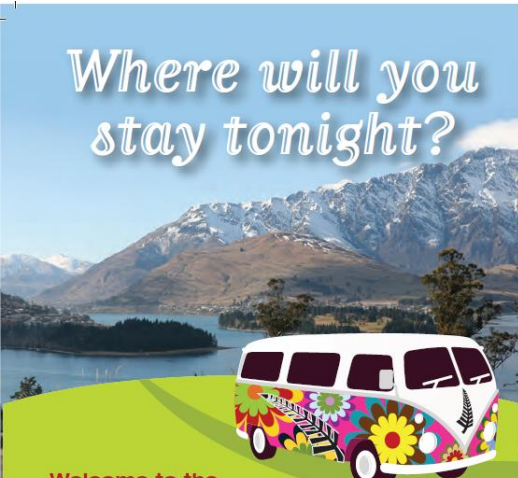
accommodation facility

collection facility

1 Sept 2011
(possibly now
lapsed)

Appendix B Queenstown Lakes flyer


The rules are simple, nicely but firmly explained, and there is a clear steer from the Council for visitors to use the campgrounds.



Where will you stay tonight?

Welcome to the Queenstown Lakes District.
There are some great places to camp here and we hope you enjoy your stay.

If you are intending to freedom camp in your vehicle then you need to know:

-  Freedom camping in town centres and residential areas is not permitted. These areas are No Freedom Camping Zones
-  If you have a self contained vehicle (with toilet and waste facilities on board) then you can camp outside of the town centres and residential areas on public land unless sign posted 'no camping'. You can stay in one place for up to two nights.
-  If you don't have a self contained vehicle then you must stay in a campground or other accommodation. A list of camp grounds in the district is on the next page.

Camping wardens can provide you with further information. Wardens may issue you with a \$200 instant fine if you are found camping in a no freedom camping zone or freedom camping without toilet facilities.



Holiday parks

- Aspiring Campervan Park, Studholme Rd Nth, **Wanaka** Ph 0800 229 8439
- Arrowtown Born of Gold Holiday Park, Centennial Ave, **Arrowtown** Ph 03 442 1876
- Frankton Motor Camp, Yewlett Crescent, **Frankton, Queenstown** Ph 03 442 2079
- Kingston Motels & Holiday Park, Kent Street, **Kingston** Ph 0800 807 836
- Lake Hawea Holiday Park, State Highway 6, **Lake Hawea** Ph 03 443 1767
- Lake Outlet Holiday Park, Lake Outlet Road, **Wanaka** Ph 03 443 7478
- Makarora Tourist Centre, State Highway 6, **Makarora** Ph 0800 800 443
- QBox, Bowen Street, **Queenstown** Ph 03 4411567
- Queenstown Lakeview Holiday Park, Brecon Street, **Queenstown** Ph 0800 482 735
- Queenstown TOP 10 Holiday Park Creeksyde, Robins Road, **Queenstown** Ph 0800 786 222
- Shotover TOP 10 Holiday Park, Arthurs Point, **Queenstown** Ph 0800 462 267
- Wanaka Lakeview Holiday Park, Brownston St, **Wanaka** Ph 03 443 7883
- Wanaka TOP 10 Holiday Park, Mt Aspiring Rd, **Wanaka** Ph 0508 WANAKA (926 252)

Campsites

- Albert Town recreation reserve, State Highway 6, **Albert Town** Ph 03 441 0499
- Boundary Creek Conservation Campsite, **Makarora** Ph 03 443 7660
- Cameron Flat Conservation Campsite, **Makarora** Ph 03 443 7660
- Kidds Bush Reserve Conservation Campsite, **Lake Hawea** Ph 03 443 7660
- Kinlock Conservation Campsite, Kinlock Road, **Glenorchy** Ph 03 442 7935
- Luggate Camping Ground, State Highway 6, **Luggate** Ph 03 443 7384
- Macetown Conservation Campsite, **Macetown** Road Ph 03 442 7935 (4WD access only)
- Moke Lake Conservation Campsite, Glenorchy Road, **Queenstown** Ph 03 442 7935
- Skippers Conservation Campsite, **Skippers** Road, (Limited vehicle access) **Queenstown** Ph 03 442 7935
- Sylvan Conservation Campsite, Routeburn Road, **Glenorchy** Ph 03 442 7935
- Twelve Mile Delta Conservation Campsite, Glenorchy Road, **Queenstown** Ph 03 442 7935



For more information visit any i-Site, DOC visitor centre or Council office at **Queenstown** 10 Gorge Road, **Wanaka** 47 Ardmore Street, Phone 03 441 0467 or visit www.qldc.govt.nz