

12 May 2021

Ministry of Business, Innovation and Employment
PO Box 1473
Wellington 6140
Attention: Responsible Camping Submissions

Tēnā koutou,

**SUBMISSION ON THE MINISTRY OF BUSINESS INNOVATION AND EMPLOYMENT DISCUSSION
DOCUMENT: SUPPORTING SUSTAINABLE FREEDOM CAMPING IN AOTEAROA COUNCIL'S 2021-31
DRAFT LONG TERM PLAN**

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the Ministry of Business Innovation and Employment (MBIE) discussion document Supporting Sustainable Freedom Camping in Aotearoa New Zealand.
2. The DCC appreciates the support MBIE has contributed toward Responsible Camping initiatives and the positive effect these have had on visitors and residents of Dunedin.

Proposal 1: Make it mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle

3. The DCC does not support the proposal to make it mandatory for all vehicle-based freedom camping to be done in certified self-contained vehicles (SCVS). The DCC currently provides three freedom camping sites at which overnight camping in all vehicle types is permitted.
4. The DCC considers this proposal to be a significant limitation to a considerable proportion of freedom campers that would typically visit Dunedin. Enforcement teams counted 8,039 non-self-contained vehicles during the 2019/2020 season; 99% of these campers abided by the Camping Control Bylaw and stayed at an unrestricted DCC freedom camping site.
5. The DCC achieved a 31% decrease in Camping Control Bylaw infringements and a 20% decrease in freedom camping related complaints by expanding provision of unrestricted freedom camping areas suitable for all vehicle types. This approach was well-received by campers and residents and was assisted by initiatives that received MBIE Responsible Camping funding, particularly the Community Ranger program and increased provision of temporary toilet facilities.
6. The DCC has made significant gains with freedom campers littering or leaving human waste in the environment. During the period 2017 – 2021 these issues made up 13% of complaints concerning freedom camping and year-on-year improvements were observed, from 26 such complaints during the 2017/2018 season to two complaints during the 2020/2021 season. Of these complaints a considerable number were attributed to itinerant/homeless campers, and the DCC submits that it is not clear if a regulatory change will lead to positive outcomes in these cases.

Proposal 2: Make it mandatory for freedom campers to stay in a vehicle that is certified self-contained, unless they are staying at a site with toilet facilities

7. The DCC supports the approach which would require all freedom campers to either stay at sites with toilet facilities or to use a vehicle which is certified self-contained. It would cover any style of freedom camping, including people who stay in tents.
8. This proposal reflects current legislation within the DCC's Camping Control Bylaw 2015. The Bylaw restricts overnight camping on Council owned or managed property to vehicles displaying a valid self-containment certificate, except at three unrestricted freedom camping sites with adequate waste facilities where camping is permitted in all vehicle types.
9. This balanced approach has allowed the DCC to limit environmental issues while still providing freedom camping opportunities to those without self-containment certification. During peak-season and periods when the city is busy with large events, the DCC's unrestricted sites become critical in meeting accommodation demand from visitors.

Proposal 3: Improve the regulatory tools for government land managers

10. The DCC supports the proposal to improve regulatory tools for government land managers.
11. Introducing a regulatory system for the SCVS – specifically an oversight regime for the certification of vehicles to the current standard, and establishment of a national register of certified vehicles will enable the vehicles to be tracked and their certification status to be checked. It will also improve consistency in the manner in which vehicles are assessed for certification.
12. The DCC is occasionally asked to enforce freedom camping rules on land owned by other government agencies. Providing this ability will be beneficial to these landowners as it will decrease the risk of these areas becoming safe havens for types of camping prohibited under the Camping Control Bylaw. The DCC will also benefit by improving enforcement consistency across the district, without significantly increasing the enforcement workload.
13. A portion of freedom camping infringements are issued to campers using rented vehicles; these have typically been international tourists and the DCC has had limited success in collecting payment in these cases. The DCC supports the proposal to make rental companies responsible for transferring infringement notices to campers and holding them accountable in cases of non-payment. As rental companies generally require customers to provide credit cards as collateral, transfer of these charges is unlikely to be an onerous process.

Proposal 4: Strengthen the requirements for self-contained vehicles

14. The DCC does not support the proposal to strengthen the requirements for self-contained vehicles.
15. The DCC is aware that some vehicles certified as self-contained under the current standard do not contain toilet facilities or do not contain toilet facilities that are readily available or adequate for regular use. The DCC acknowledges that strengthening this standard may lead to a decrease in human waste issues.

16. However, the DCC has made good progress in mitigating human waste issues with the provision of additional temporary toilet facilities and daily visits by Community Rangers tasked with providing campers with local information. Funding for these initiatives has been provided through MBIE's Responsible Camping Initiatives and these have been well received by campers, residents and business owners in proximity to these areas.
17. The DCC has some concerns that a large proportion of visitors to Dunedin will be excluded from freedom camping if self-containment certification is restricted to vehicles with permanently plumbed toilet facilities. Staff estimate that only 10% of Dunedin's typical freedom camper visitors have historically used these types of vehicles. Campers unable to meet the new certification requirements would likely be faced with choosing to camp at unrestricted freedom camping sites, or stay at registered camping grounds, and issues of overcrowding at unrestricted sites could remerge as a major issue for the city.
18. A significant proportion of the human waste issues the DCC encounters are associated with itinerant or homeless campers, and the DCC queries whether enforcement measures will have positive effects in these cases.

Conclusion

19. The DCC encourages MBIE to continue their investment in "Responsible Camping Initiatives" as contained in 'Supporting Sustainable Freedom Camping in Aotearoa New Zealand'.
20. The DCC thanks MBIE for the opportunity to submit on these proposals.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Aaron Hawkins', with a stylized flourish at the end.

Aaron Hawkins
Mayor of Dunedin