



Order Paper for a meeting

HEARING OF SUBMISSIONS:

Proposed QLDC Freedom Camping Bylaw 2019

to be held on

Thursday, 21 November 2019

commencing at 1.00pm

In the Armstrong Room, Lake Wānaka Centre,

Wānaka

And to be held on

Friday, 22 November 2019

commencing at 1.00pm

In the Council Chambers, 10 Gorge Road,

Queenstown

12 ITEMS OF BUSINESS NOT ON THE AGENDA WHICH CANNOT BE DELAYED

A meeting may deal with an item of business that is not on the agenda where the meeting resolves to deal with the item and the Chairperson provides the following information during the public part of the meeting:

- (a) the reason the item is not on the agenda; and
- (b) the reason why the discussion of the item cannot be delayed until a subsequent meeting.

s. 46A (7), LGOIMA

Items not on the agenda may be brought before the meeting through a report from either the chief executive or the Chairperson.

Please note that nothing in this standing order removes the requirement to meet the provisions of Part 6, LGA 2002 with regard to consultation and decision-making.

9.13 DISCUSSION OF MINOR MATTERS NOT ON THE AGENDA

A meeting may discuss an item that is not on the agenda only if it is a minor matter relating to the general business of the meeting and the Chairperson explains at the beginning of the public part of the meeting that the item will be discussed. However the meeting may not make a resolution, decision or recommendation about the item, except to refer it to a subsequent meeting for further discussion.

REFERENCE:

Queenstown Lakes District Council Standing Orders adopted on 15 December 2016.

QUEENSTOWN LAKES DISTRICT COUNCIL

HEARING OF SUBMISSIONS ON:

PROPOSED QLDC FREEDOM CAMPING BYLAW 2019

PANEL MEMBERS

Councillor C MacLeod (Chair)

Councillor P Clark

Councillor H Copland

Councillor N Shaw

Proposed QLDC Freedom Camping Bylaw 2019

Agenda for a hearing of submissions on the Proposed QLDC Freedom Camping Bylaw 2019 to be held in the Armstrong Room, Lake Wānaka Centre, Wānaka on Thursday 21 November 2019 beginning at 1.00pm and in the Council Chambers, 10 Gorge Road, Queenstown on Thursday 22 November 2019 beginning at 1.00pm

Item	Page Number	Report Title
		Apologies
		Declarations of Conflict of Interest
		Confirmation of Agenda
1	Page 5	Officer report: Hearing: Submissions on the Proposed Queenstown Lakes District Council Freedom Camping Control Bylaw 2019
	Page 13	Attachment A: Submissions
	Page 99	Attachment B: Statement of Proposal
	Page 107	Attachment C: Proposed QLDC Freedom Camping Bylaw 2019

**Freedom Camping Control Bylaw Hearings Panel
21 November 2019**

Report for Agenda Item | Rīpoata moto e Rāraki take: 1

Department: Community Services

Title | Taitara Hearing: Submissions on the Proposed Queenstown Lakes District Council Freedom Camping Control Bylaw 2019

PURPOSE OF THE REPORT | TE TAKE MŌ TE PŪRONGO

- 1 The purpose of this report is to present the written submissions received by the Queenstown Lakes District Council on the Proposed Queenstown Lakes District Council Freedom Camping Control Bylaw 2019, and for the hearings panel to hear oral submissions, and to outline options to the hearings panel.

EXECUTIVE SUMMARY | WHAKARĀPOPOTOTANGA MATUA

- 2 On 10 October 2019, Council approved the commencement of the special consultative procedure and publicly notified a proposed new bylaw to regulate freedom camping in the Queenstown Lakes District.
- 3 The consultation period began on 10 October 2019 and closed on 11 November 2019. During the consultation period, 81 submissions were received. Nineteen submitters have indicated that they wish to speak in support of their submission. This report presents the submissions for consideration by the hearing panel.

RECOMMENDATION | NGĀ TŪTOHUNGA

That the **Freedom Camping Control Bylaw Hearings Panel:**

1. **Note** the contents of this report;
2. **Consider** the submissions to the Proposed Queenstown Lakes District Council Freedom Camping Bylaw 2019;
3. **Recommend to Council** the final form of the Queenstown Lakes District Council Freedom Camping Control Bylaw 2019 be adopted, incorporating any changes following consideration of public feedback from the submissions.

Prepared by:



Jeannie Galavazi
Senior Parks and Reserves
Planner

13/11/2019

Reviewed and Authorised by:



Thunes Cloete
General Manager, Community
Services

15/11/2019

CONTEXT | HOROPAKI

- 1 The Queenstown Lakes District Council Freedom Camping Control Bylaw 2012 (**Current Bylaw**) expires on 19 December 2019.
- 2 At its 10 October 2019 meeting the Queenstown Lakes District Council resolved to approve the commencement of the special consultative procedure in relation to the proposal to make a new bylaw to regulate freedom camping in the Queenstown Lakes District (**District**), the Proposed Queenstown Lakes District Council Freedom Camping Control Bylaw 2019 (**Proposed Bylaw**).

Resolution:

Approve commencement of public consultation using the special consultative procedure in relation to the proposal to make a new freedom camping bylaw under s 11 of the Freedom Camping Act 2011;

Appoint three councillors to hear and consider the submissions on the proposal and make recommendations to the Council on adoption of the proposed bylaw and delegate to the Mayor the authority to make those appointments once the 2019 local authority election has occurred.

- 3 The Council also resolved to appoint three councillors to hear and consider submissions on the proposal, and to make recommendations to Council on adoption of the Proposed Bylaw, and to delegate the authority to the Mayor to make those appointments.

Resolution:

That the Council appoint Councillors Clark, Copland, MacLeod and Shaw to hear and consider the submissions on the proposed QLDC Freedom Camping Bylaw 2019 proposal and make recommendations to the Council on adoption of the Bylaw;

That the quorum of the hearing panel shall be Councillor MacLeod who shall chair the hearing, plus at least two of the three remaining members

- 4 The review process and key milestones in the special consultative procedure are summarised below

DATE	Council instructed staff to begin a Freedom Camping Control Bylaw review.
10 October 2019	Council instructed staff to undertake a special consultative procedure on a proposed new bylaw.
10 October 2019	Submissions opened.
24 October	Resolution at QLDC Full Council Meeting: 1. That the Council appoint Councillors Clark, Copland, MacLeod and Shaw to hear and consider the submissions on the proposed QLDC Freedom

	Camping Bylaw 2019 proposal and make recommendations to the Council on adoption of the Bylaw; 2. That the quorum of the hearing panel shall be Councillor MacLeod who shall chair the hearing, plus at least two of the three remaining members.
11 November 2019	Submissions closed.

- 5 The Proposed Bylaw is to replace the current Bylaw. The current Bylaw sets out the rules regarding where freedom camping is permitted, restricted or prohibited within the District. However, the current Bylaw will be revoked by operation of law in December 2019.

Proposal

- 6 Following Council approval, Council staff commenced a special consultative procedure on the Proposed Bylaw. The Proposed Bylaw establishes where freedom camping is permitted, restricted or prohibited within the District.
- 7 The key changes in the Proposed Bylaw (compared to the current Bylaw) that were consulted on were:
- a. Prohibited areas are proposed to include residential areas that have expanded since 2012, including Lake Hawea, Wanaka, Albert Town, Luggate, Cardrona, Arthurs Point, Jacks Point, Lake Hayes Estate, Quail Rise, Tuckers Beach, Kingston and Gibbston Valley.
 - b. Prohibited areas are proposed to include new residential areas under construction in Hanley's Farm, Bridesdale Farm, Shotover Country, Coneburn, Hawea and Frankton Flats.
 - c. Prohibited areas are proposed to include the road between Queenstown and Glenorchy, and the road between Wanaka Township and Glendhu Bay.
 - d. More simplified and streamlined drafting.
- 8 The Proposed Bylaw and Statement of Proposal were publicly notified by advertisement on the QLDC website and in local newspapers between 10 October and 17 October 2019, including the Otago Daily Times, the Southland Times, the Mountain Scene and the Wanaka Sun.
- 9 The Proposed Bylaw, the statement of proposal and other supporting documents were made available on the Council's website, at the Council offices at 10 Gorge Road, Queenstown and 47 Ardmore Street, Wanaka.
- 10 Submissions opened on 10 October 2019 and closed on 11 November 2019.

ANALYSIS AND ADVICE | TATĀRITANGA ME NGĀ TOHUTOHU

Submissions received

- 11 From 10 October 2019 - 11 November 2019, 81 submissions were received on the Proposed Bylaw. Copies of the submissions are attached as **Attachment A**.
- 12 Thirty-three submissions supported the Proposed Bylaw in full. Thirty-eight submissions were partly in support and partly in opposition; the majority of these submitted that the Proposed Bylaw did not go far enough to prohibit freedom camping. Two submissions had no opinion on the changes.
- 13 Eight submissions opposed the Proposed Bylaw.
- 14 Twenty submitters have indicated that they wish to be heard in support of their submission.
- 15 The hearings panel are to give full consideration to the submissions received and determine the extent to which the submissions will be accepted or disallowed.

Key themes from submissions

- 16 Submissions received generally fell into three categories.
- 17 The first category is those submissions that fully supported the Proposed Bylaw. These submissions focussed on the protection of the environment and protecting public access to reserves for recreation and day use. Further reasons submitters supported the Proposed Bylaw included reducing the visual pollution of campervans, and reducing rubbish and pressure on infrastructure such as public toilets.
- 18 The second category is those submissions that supported the Proposed Bylaw, but that submitted that the Proposed Bylaw did not go far enough to prohibit freedom camping in the District. These submissions proposed that more areas should be prohibited areas, such as a complete prohibition of freedom camping across the Queenstown Lakes District. Additional prohibited areas include:
 - Makarora township to Makarora West
 - State Highway 6 from Wanaka to Makarora
 - Diamond Lake area
 - Cardrona River outlet reserve area
 - Frankton Beach area
 - Luggate
 - Car park on summit of the Crown Range
 - Several areas around Hawea:
 - Hawea Dam to The Neck
 - Glen Dene Station
 - Along Meads Road to Kidds Bush camping ground
 - Along east side of lake from John Creek to Timaru Creek
 - Wharf Creek boat ramp (head of Lake Wanaka)

- Tuckers Beach Wildlife Management Reserve and Tuckers Beach Recreation Reserve.
- 19 The third category is those submitters who opposed the changes included in the Proposed Bylaw. These submitters sought freedom camping to be more permitted across the District, and should be strictly controlled, or only available to the NZMCA or vehicles that are subject to stricter self-containment standards, such as fixed toilets.

NZMCA submission

- 20 The New Zealand Motor Caravan Association submission can be summarised into the following points:
- Recommends at a minimum allowing Certified Self Contained motorhomes and caravans to freedom camp within the prohibited areas
 - NZMCA is not convinced the new bylaw is the most appropriate and proportionate response to addressing the relevant problems in Queenstown Lakes
 - The bylaw should consider introducing a higher standard of self-containment than NZS 5465: 200, and that this is not a significant change to the bylaw
 - The streamlined and simplified bylaw wording is supported
 - The bylaw process is predetermined and the maps are confusing and there was improper consultation
 - The online geomaps show new prohibited areas implying pre-determination of the bylaw
 - That QLDC's protection of residential amenity is not justification for extended prohibition
 - The extended prohibited areas are disproportionate to perceived problems arising from freedom campers

Maps and Schedule A Bylaw Wording

- 21 Several submitters state the bylaw wording is confusing as it states in Schedule A that Prohibited, Restricted and Permitted areas to freedom camp and shown on the maps. The draft maps notified show only the Prohibited Areas.
- 22 The NZMCA submission also notes that the QLDC's online information for camping showed geomaps that showed additional prohibited areas to the existing bylaw. It also notes the Statement of Proposal wording refers to extended or new prohibited areas such as Luggate, Kingston and Jacks Point/Wye Creek.
- 23 Several submitters noted Makarora township and Makarora West are prohibited areas in the Current Bylaw but do not appear on the Proposed Bylaw Maps.
- 24 Officer comment is that:

The final maps can be updated following the hearings to show the restricted areas agreed to and recommended by the hearings panel. All other areas that are not shown as prohibited or restricted are permitted. The Statement of Proposal wording is correct for the additional proposed and existing areas such as Luggate and Kingston and Makarora.

This was an error in the draft maps that can be corrected following the hearing if recommended by the hearings panel.

The geomaps were changed online in error. This has since been corrected and all public information including signage is in accordance with the Current Bylaw.

Other common submission topics

- More on the ground presence and enforcement and education is required
- All camping should be user pays
- Local businesses are negatively impacted, particularly campgrounds
- Any New Zealander should have the right to freedom camp without any regulations
- Freedom Camping increases prevalence of accidental fires and fire risk

25 **Option 1** The Hearing Panel recommends to Council that the Proposed Freedom Camping Control Bylaw 2019 be adopted without changes

Advantages:

- 26 The Council will be able to enforce under the FCA in prohibited and restricted areas in the District, and will be able to issue freedom camping infringement notices in prohibited and restricted areas.
- 27 Continued enforcement will reduce the risk of environmental damage, and also protect public recreation accessibility to these areas.
- 28 Council will be acting consistently with its own Responsible Camping Strategy.
- 29 The bylaw will be more user friendly and consistent with the FCA.
- 30 The Council will be acting more consistently with feedback received from its internal stakeholders to simplify the bylaw and make it easier for users to understand.

Disadvantages:

- 31 Some submitters may perceive that issues raised through consultation are not addressed, both those in support and those opposed.
- 32 Specific issues raised by submitters, both individuals and organisation will not be addressed.
- 33 The Council's financial and resource costs with enforcing freedom camping will continue to increase with forecasted tourist numbers in the District.
- 34 **Option 2** The Hearing Panel recommends to Council that the Proposed Freedom Camping Control Bylaw 2019 be adopted with changes to the prohibited areas following consideration of submissions.

Advantages:

35 Option 2 will have the same advantages as Option 1, as well as:

36 Some submitters will perceive that the issues they have raised through submissions have been addressed by Council.

Disadvantages:

37 The Council's financial and resource costs with enforcing freedom camping will continue to increase with forecasted tourist numbers in the District.

38 The Proposed Bylaw expands areas in which freedom camping is prohibited. This is considered a disadvantage because, while it may be necessary to protect the amenity and health and safety of residents of newly expanded or developed residential areas, it will have the effect of conversely reducing the area in which freedom camping is allowed in self-contained vehicles.

39 **Option 3** The Hearing Panel recommends to Council that the Proposed Freedom Camping Control Bylaw be adopted with changes that require stricter standards than the New Zealand Standards for Self Containment

Advantages

40 Motorhomes and Caravans that have a fixed toilet will be able to freedom camp in prohibited areas.

Disadvantages

41 Imposing additional controls to current standards and legislation would lead to inefficiencies and confusion for campers. Digressing from the national approach for camping is inconsistent with council's own Responsible Camping Strategy. Recreational users of the reserves may still feel displaced, and given the exponential increase in campers visiting the district, there will be a disproportionate level of investment and enforcement required for a small number of sites.

42 **Option 4** The Hearing Panel recommends to Council that the Proposed Freedom Camping Control Bylaw 2019 not be adopted, or the status quo

Advantages:

43 There will be no financial or resource costs to enforcing a new bylaw.

Disadvantages:

44 Enforcement officers will still be required to enforce infringement offences under the FCA that do not relate to camping, including damage to flora and fauna, or dumping of waste.

45 The Council can continue to use non-regulatory approaches to manage freedom camping. It is hoped that these measures will reduce the problem, but that may be more difficult if the number of non-self-contained freedom campers has increased.

- 46 The Council would be acting inconsistently with its own Responsible Camping Strategy, which promotes responsible self-contained vehicle usage. While the Council may decide to adopt a new bylaw at a later time after the current bylaw is revoked, this option means that there will be no bylaw in force for the 2019-2020 peak freedom camping season, which is generally between November and March.

LEGAL CONSIDERATIONS AND STATUTORY RESPONSIBILITIES | KA TURE WHAIWHAKAARO, ME KĀ TAKOHAKA WAETURE

- 47 The power to make the Proposed Bylaw is contained in section 11 of the Freedom Camping Act 2011. Section 11(2) of the FCA contains a number of decision-making requirements when making a bylaw. The Council must be satisfied that:
- a. The bylaw is necessary to protect the areas for which freedom camping is prohibited or restricted, to protect the health and safety of people who may visit the areas, or to protect access to the areas.
 - b. The bylaw is the most appropriate and proportionate way of addressing the perceived problem in relation to the areas.
 - c. The bylaw is not inconsistent with the New Zealand Bill of Rights Act 1990.
- 48 Consultation is required under the FCA, which requires the special consultative procedure in sections 83 and 86 of the Local Government Act 2002 to be undertaken.

ATTACHMENTS | NGĀ TĀPIRIHANGA

- A Copies of Full Submissions
- B Statement of Proposal
- C Proposed Freedom Camping Control Bylaw 2019

Attachment A: Submissions

ATTACHMENT A: Submissions to the Proposed Freedom Camping Control Bylaw 2019

	Name	Heard	Support/Oppose	Stance on the Freedom Camping Bylaw 2019 proposed changes:	Additional Comments
1	Melissa Laucht	No	I am in favour of these proposed changes	I think luggate also needs to be included in the changes not just Hawea. Luggate is becoming a larger town and has its own camp ground. Having the freedom camping spot near the red bridge last year decreased the revenue from the luggate camp ground and also increased the rubbish left near the river and the red bridge freedom camping ground. There should be no freedom camping 10km from a camp ground including the one in luggate. Especially when it increased the number of fire call outs during summer as freedom campers we having open fires at the red bridge freedom camping and many campers at the ground were not self-contained. Luggate needs to also be included in the freedom camping bylaw.	
2	Jules Mumford	No	I am in favour of these proposed changes		
3	Vivien Eysers	No	I am in favour of these proposed changes	I am in favour of any moves that reduce the negative environmental and social impacts of freedom camping which have grown rapidly in tandem with the increase in visitor numbers. Apart from the immediate effects of pollution and crowding it is not a sustainable form of travel. I am in favour of any measures that encourage visitors to steer away from self-drive vehicles (particularly large ones) and use public transport and accommodation provided by local people.	The requirements for being self-contained are too lax. Some vehicles displaying the stickers quite clearly do not have the space for a toilet. There is evidence that many who do have toilet facilities choose not to use them making the distinction of "self-contained" or not, irrelevant. I would be happy to see further restrictions requiring camper vans to use proper camping grounds or privately owned areas. One area commonly used is the car park on the summit of the Crown Range and I am opposed to freedom camping at this location. It is a car park not a camping ground. It could be possible to accommodate resident NZers who have privately owned motor homes through requiring them to operate under the Motor Home organisation and allow more flexibility in terms of camping if they are operating within an organisation which has some regulating influence. There are road safety issues with the very large vehicles often rented by inexperienced drivers - particularly on roads such as the Crown Range.
4	Bernadette Frost	No	I am in favour of these proposed changes	Freedom campers need to be directed by both rental car companies and local police/community's to designated camping grounds!	No servicing of random areas by our council to encourage camping I.e. rubbish bins, portaloos etc like at the Hawea/Tarras turnoff! Once again direct to our camping grounds, fully serviced and not costing our council/ratepayers.
5	Anna Mickell Queenstown Chamber of Commerce	No	I am in favour of these proposed changes	The Queenstown Chamber of Commerce supports the changes to the proposed by-law in advance of the upcoming, possible, introduction of the local visitor levy on accommodation providers. It is important that this levy is applied equitably across all forms of accommodation. Free camping presents an issue with respect to the integrity of levy application and all mechanisms should be used to direct campers to dedicated campgrounds across the region which are capable of charging the visitor levy.	
6	Jabin Lamble	No	I am partly in favour and partly opposed to these proposed changes		
7	Chris Hadfield	No	I am partly in favour and partly opposed to these proposed changes	Freedom camping should be banned from everywhere except for fully self-contained motor homes	
8	Stephen Jarvis	No	I am in favour of these proposed changes	I'm in approval of this bylaw change to help stop the degradation of our parks and rural areas by Freedom Campers using inappropriate vehicles	

	Name	Heard	Support/Oppose	Stance on the Freedom Camping Bylaw 2019 proposed changes:	Additional Comments
9	Jane Shearer	No	I am partly in favour and partly opposed to these proposed changes	I am in favour of the changes, given the options - no Bylaw and no change are not my preferred options. However, the whole approach seems archaic in that it seems to deal with the situation by sequentially limiting areas to freedom camping as they become more popular. In other words, as you block off one area, another will become overloaded, then the next Bylaw will have to ban Freedom Camping in that area. I would prefer an approach that makes the whole district a no camping area, then stipulates the particular areas in which Freedom Camping is allowed. I write this as a Gibbston resident - if you ban Freedom Camping on the main road, you will push it to more residential areas of the valley. Why is this appropriate/acceptable? I don't want to live in an area where there are vehicles constantly parked on the side of the road and people living in them. And I certainly wouldn't want to have to wait for a Bylaw to be passed once a problem developed.	My preferred option, obviously not achievable in this process, would be that Freedom Camping should be allowed only in areas where there is no visible structure that has the potential to be a permanently inhabited dwelling; this would remove conflict between those who live places and those who want to visit. The whole original intent of Freedom Camping was to camp in wild places, places without people. Not to have people camping all over the country wherever they see fit! We have entirely lost the purpose to the pervasive goal of making money through tourism. There are many countries in which vehicles can only park in designated campsites and they don't suffer from a lack of tourism, nor do the people in those countries have any issue with the situation. Given the numbers of campers in NZ, that is where we should be headed - if people want to drive around NZ, they pay for the privilege of staying.
10	Marlene Laureys	No	I am in favour of these proposed changes		
11	Brenda Jessup	No	I am partly in favour and partly opposed to these proposed changes	<p>I believe freedom camping should not be allowed any longer in New Zealand. I grew up in a family that loved to camp around New Zealand and still love to camp but with the number of overseas visitors freedom camping is not sustainable and is having a significantly negative effect on communities. I now choose to pay and comply, using camping grounds. I resent that visitors come to our country and freeload at ratepayers' expense.</p> <p>I think the government needs change the laws to give local authorities the power to control this situation and get people back into licensed camping grounds. It is ludicrous that camping grounds need to reach a compliance level but people are sleeping in people movers "freedom camping" car parks.</p> <p>Alternatively, these car parks could have a ticketing booth to at least pay a fee for each night stay.</p> <p>They should pay to have their waste disposed of. Someone needs to pay, it should be the producer of the waste.</p> <p>I see people freedom camping in Albert Town where there is a beautiful DOC camp ground available. \$8.00 per night is very cheap. When I visit other countries I expect to pay for my accommodation (unless staying with friends or family) and would not be allowed to stay for free in my car in the local park.</p> <p>I see the blue "self-contained" stickers on vehicles that are clearly not self-contained. This is displaying false information. I am really concerned there is no follow-up on the certification of these vehicles.</p> <p>I like tourists. They need to follow the rules and our local authority needs to enforce them.</p>	
12	Susan Manson	No	I oppose these proposed changes	<p>I would like freedom camping completely banned except for purpose built, fully self-container campervans. No more converted vans, people sleeping in cars, or in tents.</p> <p>Proper enforcement of the no camping sites and higher penalties for those who do.</p> <p>We have camping grounds, paying rates and complying with safety regulations, creating employment etc that should not be penalised by allowing free camping.</p>	
13	Nat Craig	No	I am in favour of these proposed changes	I am in favour of the proposed changes but would like to see them extended further.	<p>I am generally opposed to Freedom Camping for several reasons.</p> <ol style="list-style-type: none"> 1. Environmental - as with many requirements for regulation it is often the minority that cause the problems however, that does not mean you do not regulate if there is an ongoing problem. The minority spoil it for the majority. There continues to be too much environmental consequence from Freedom camping. Designated camping sites will overcome most of these environmental problems. 2. Commercial - independent camp operators have provided good facilities for Freedom Campers at a very low user cost. This gives access to toilets, showers, rubbish disposal etc. Given they have invested in infrastructure and are providing this at a cheap cost, I don't believe rate or taxpayers should need to fund additional facilities. If Freedom Campers are not prepared to pay \$10-20 per night for these facilities then perhaps they are not desirable tourists and we should be targeting tourists who are prepared to pay a small price per night for staying in NZ.
14	Sarah Barham	No	I am in favour of these proposed changes	Is the Frankton Beach area included in the prohibited zones as there is a lot of freedom camping that happens there and sometimes a village covering the grass by the little jetty!?	
15	Shirley Allan	No	I am in favour of these proposed changes	<p>Adopt the proposed Freedom Camping Bylaw 2019 which increases the areas in which freedom camping is prohibited.</p> <p>There should be NO temporary hubs for limited overnight camping.</p>	A number of user pays showering, washing and waste disposal facilities should be installed at strategic points around the QLDC. I point out that these should be user pays because the rate payers are not here to pay for the freeloading campers to have a holiday. These are basic services that everyone has to pay for in

	Name	Heard	Support/Oppose	Stance on the Freedom Camping Bylaw 2019 proposed changes:	Additional Comments
				More toilets should be installed in areas where freeloading campers like to congregate during the day.	their own home - hardship grants are available from WINZ for those genuinely in need. Those on holiday should be paying their own way.
16	Mags Helles	No	I am in favour of these proposed changes	I fully support Option 3 – Adopt the proposed Freedom Camping Control Bylaw 2019, and revoke the Freedom Camping Control Bylaw 2012. If the new Bylaw 2019 is approved and implemented for the summer season 2019/ 2020, I propose QLDC review and evaluate how effective these changes are in after this summer / autumn period and don't wait another 7 years. The impact of tourism on Wanaka and Queenstown is significant. While the area experience largely positive consequences of tourism, the negative impact on the natural environment is significant. Therefore, it is critical QLDC set targets, which will provide objective measures to evaluate if the proposed bylaw is working or not - or it needs to be tighter.	
17	Wayne Hudson	Yes	I am partly in favour and partly opposed to these proposed changes	<p>The fundamental approach of the proposed bylaw is wrong. The last thing we should be doing is encouraging freedom camping. Section 3.1(a) should be altered to read "discourage freedom camping"; section 3.1(b) should be deleted; and the first word of section 3.1(c) should be replaced with "eliminate" (if that is not acceptable then "control" should have added to it "and reduce"). Freedom camping has a destructive impact on the district. The users of self-contained vehicles add very little value to the district economy. Most of them rent their vehicles from companies outside the district and generally only buy fuel from a national chain of suppliers and buy food from a national chain of supermarkets. They don't spend money at campgrounds and have a great tendency to despoil the environment.</p> <p>The Council goes to some lengths to provide for freedom campers by creating free camping spaces with toilets and rubbish skips. At the same time the Council owns the land leased to campgrounds in the District. It makes more sense for the Council to direct freedom campers to pay to stay at those campgrounds, thereby improving the financial lot of the campground managers and bringing more revenue into the district. It also keeps the tourists where they can be seen and forces them (hopefully) to use sanitation blocks.</p> <p>In most countries I have visited freedom camping is not allowed. In countries such as France and Germany, instant fines are issued to anyone parking in a public space. Why must we in New Zealand allow people to do what is frowned on elsewhere?</p> <p>The fact that NZ has a weak dollar is also encouraging cheapskate tourists to come to NZ knowing they can rent a cheap horrible camper van (eg Wicked Campers, Mad Campers) and avoid having to pay anything to stay anywhere. We need tourists who add value to our economy and the only way to do that is to make their trips more expensive.</p> <p>The Council also appears to have a lot of unpaid fines owing by users of freedom camper vans, who leave the country without paying. The Freedom Camping Act does allow the Council to charge the rental companies, if (as is nearly always the case) the camper vans are used in the commission of an offence under the Act. Therefore, if Council were to enforce the fines against the rental companies, this would reduce the level of fines, improve the chances of freedom campers abiding by the law, and bring in much needed revenue for the Council.</p> <p>There are so many things wrong with freedom camping - the Council should be doing a lot more, and should certainly not be encouraging more of it</p>	
18	Tom Kettlewel	No	I am in favour of these proposed changes	It can't happen too soon enough, I deal with the aftermath of freedom campers daily and sick of it	
19	Emberly Wetherall	No	I am in favour of these proposed changes	I support the changes and would like to take it a step further with the removal of the free camping spots. We have more than enough campgrounds to occupy all the camper vans passing through the district and I think those tourist should be contributing towards the use of facilities and their stay. I think the ban should also include highway 6 from Wanaka to Makarora, which is also a hot stretch of road for camper vans. Creating hefty fines for those who break the rules, and enforcing the fines through payment prior to leaving the country should be put in place otherwise there isn't any reason not to park up wherever you please. Rental car companies could get involved with information regarding good stewardship while traveling the country, plus what to do and not to do while on your journey.	
20	Rhiannon Hyams	No	I am in favour of these proposed changes	I agree that the new proposed bylaws include new areas.	Freedom camping is a huge problem in our district and just needs to be better regulated. People shouldn't be allowed to just park up where they want and leave piles of rubbish behind in our beautiful district.
21	Julia Aspinall	No	I am in favour of these proposed changes	The freedom camping bylaw takes a step towards solving the issues of freedom campers. But the definition of a freedom camper is currently a joke. I have seen mobility scooters with the blue stickers denoting a self-contained vehicle. Freedom camping anywhere should be banned unless there is a public toilet at the site or the operators of the vehicle can prove it is entirely self-contained. The blue stickers prove nothing.	Please support our camping grounds. Provision of free camping sites elsewhere e.g. the Red Bridge is not helping our camping ground owner/operators sustain their businesses!
22	Heather Thorne	No	I am partly in favour and partly opposed to these proposed changes	I agree with Option 3 which will make the law simpler and extend the areas where there can be no freedom camping.	There needs to be far more QLDC presence on the ground educating, monitoring and dealing with compliance. Cars and small vans showing self-containment certificates on vehicles, which clearly are not fully self-contained, should not be permitted to freedom camp but should be directed to commercial campgrounds. We paid a lot of money to have our caravan fully self-contained and to see cars and vans carry these certificates makes a mockery of the whole system. If visitors infringe the freedom camping laws they should pay the fine immediately or be wheel clamped. In the Coromandel compliance officers are very

	Name	Heard	Support/Oppose	Stance on the Freedom Camping Bylaw 2019 proposed changes:	Additional Comments
					obvious and frequently on patrol and carry an eftpos machine for the payment of fines and offenders don't leave until the fine is paid.
23	Tim Allan	No	I am in favour of these proposed changes	Freedom campers are high-volume low-value tourists whose benefit to NZ is arguable. Any changes that will restrict their activities, and the damage they are creating, is good. Please see further recommendations below.	<p>The proposed bylaw does not go far enough. I propose the following additional measures:</p> <ol style="list-style-type: none"> 1. Prohibit freedom camping in vehicles that are not certified as self-contained anywhere within QLDC's jurisdiction, unless they are parked within a freedom camping zone and within 500 metres of a public toilet. 2. Prohibit all freedom camping within 500 metres of any residence. (We live down a rural road, and are sick of freedom campers parking in close proximity to our home. We have seen, from our dining table, campers defecating in the paddock.) 3. Infringement penalties issued under the Freedom Camping Bylaw 2019 should be payable immediately, or else QLDC representatives can clamp the vehicle concerned. 4. QLDC should have the ability to issue infringement notice for vehicles that fraudulently claim to be self-contained when they are not compliant with NZS 5465:2001. Two infringement notices should be issued for non-compliant vehicles (i) camping when prohibit, and (ii) Display of a fraudulent documentation claiming to be compliance with NZS 5465:2001. <p>I also propose that QLDC allocates appropriate resources to the regular enforcement of freedom camping bylaws, including the ability to confirm that a campervan is genuinely self-contained, as defined by NZS 5465:2001. Confirmation of non-compliance of NZS 5465:2001 should result in the issuance of a fines (payable immediately, as above).</p>
24	Deborah	No	I am partly in favour and partly opposed to these proposed changes	I applaud the QLDC for extending the areas where freedom camping is banned. However, I don't feel it goes far enough. Red bridge at Luggate for example is over-used and frequently trashed by freedom campers despite 'education' and portaloos etc. Ideally, QLDC should ban freedom camping throughout the region as harm continues to be done to the environment. Pushing them out of some areas will put pressure on others. Meanwhile, the council should lobby government to repeal the freedom camping act. It is unnecessary and is costing the country in countless ways. These are not tourists we need or want. Kiwis who freedom camp can join local/national associations for a small fee which gives them access to parking areas should as clubroom grounds. This contributes something to the use of toilet blocks and waste disposal. Nothing in life is free - we are all paying as tax and rate payers for freedom campers in terms of roads, pull-outs, waste disposal and sanitation. The damage to local flora and fauna is rampant. Local businesses are suffering. And sadly, some campers are becoming increasingly belligerent. We are regarded as a soft touch globally so it is little wonder we are attracting disrespect from free-loading freedom campers. All of us pay for our accommodation either as rent or mortgage or rates. We should not be subsidising people who want to live for free. Moreover, homeless people living rough on the streets or in their cars in this country deserve help from government - not people on holiday wanting overnight camping for free.	
25	Mary Bruce	No	I am partly in favour and partly opposed to these proposed changes	<p>I can see the need for this bylaw, but I feel freedom campers should be welcomed and provided for in our community by the provision of a number of attractive overnight freedom camping areas. Also provide day use facilities such as rubbish disposal and toilets (& perhaps showers.)</p> <p>The current government subsidy could pay for these facilities plus some ratepayers money if needed. Funding could also be sought by asking freedom campers to pay a small usage fee.</p> <p>Although we need to control where visitors freedom camp, they should be made welcome in our communities. They do contribute to our community by spending money here and some also become part of our casual workforce.</p>	
26	Andrew Millar	No	I am in favour of these proposed changes	I agree with the sentiments and intentions. However I believe there are other highly frequented areas which should be in the exclusion zone. Eg Diamond Lake area, and Cardrona River outlet reserve area.	By far the greatest category of freedom campers which "offend" against the principles outlined in the proposal are non-self-contained camper vehicles, including those which purport to be self-contained by virtue of an identification sticker but which clearly are not functionally self-contained. It appears that the majority of these vehicles are rented from operators within New Zealand. It may be beneficial to endeavour to engage with these operators (including through the NZ Rental Vehicle Association) and seek their cooperation in assisting to reach the outcomes outlined in the proposal, and in addition to pointing out the penalties associated with infringement. Such an outreach would be more effective if it could be done jointly with as many other local authorities and agencies as you can muster. The more unified the approach, the more likely it is to have some effect.
27	James Bennett	No	I am partly in favour and partly	My stance in that QLDC needs to stop banning freedom camping. You cannot keep restricting locals from doing what we've done for 30 plus years. A majority of the council aren't from here and don't understand how important the ability to freedom camp was to us when we were younger, and in the present day. Sure tourists take advantage but locals/ residents should not be punished for the actions of foreigners who do not respect our places.	

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			opposed to these proposed changes		
28	Vanessa Rogers	No	I am partly in favour and partly opposed to these proposed changes	<p>For Wanaka, there is a simple answer.... Direct ALL Freedom Campers to Albert Town campsite, there is tonnes of room, where council spend on putting in showers and toilets, instead of making paths along the lakefront. You charge \$10 -\$12 per person to cover this. Put up street signs directing people to it, as tourists will not know. I would happy work there and oversee it. People are reluctant to pay for a patch of grass only which is currently offered, and instead will "park up somewhere" YOU NEED to provide toilet and shower/ water taps. basic human things we all need whilst travelling and they will naturally want to be there. Signage has always been poor and only focusing on where NOT to freedom camp. We need signs saying where we CAN freedom camp if you want to keep people in certain zones. I live in Wanaka and I have no idea where and where I could freedom camp if I wanted to and this byelaw doesn't address that.</p> <p>Also re parking on lake front. Have one sole car park on the lake front for motorhomes. They are obliterating the view of the lake on a daily basis.</p>	Re the HUB. It should not be only for van owners. if I carry a tent in my car I am a freedom camper travelling and would like to be able to use the hot shower. I was turned away last year... as I didn't have a van (AND I LIVE IN WANAKA!) I just happened to have rented my house out that week, did the roys peak track and needed a shower.
29	Simon Wilkinson	No	I am in favour of these proposed changes	Instead of hundreds of signs saying no camping why not make it so you can only freedom camp in areas that have freedom camping allowed signs. Freedom camping elsewhere outside of these designated area would then a violation of the bylaw.	
30	Fleur Kinsella	No	I am in favour of these proposed changes	I would like to see it banned throughout the district. There have been too many accidental fires, environmental destruction (tree branches broken for firewood, etc) and human waste everywhere	
31	Jane Forsyth	No	I am partly in favour and partly opposed to these proposed changes	<p>The ideas are generally good but the proposed changes do not go far enough.</p> <p>In the area of Lake Hawea, the prohibited zone needs to be extended from Hawea Dam to The Neck, and to be continuous along the state highway (the current map has a gap at Glen Dene Station). The prohibited zone also needs to extend along Meads Rd to the Kidds Bush camping ground, and along the east side of the lake from John Creek to at least Timaru Creek.</p> <p>There does not appear to be any prohibited area proposed at Makarora. Currently there are restricted areas here, but the new bylaw seems to have left these off. Is this an oversight? I would also like to see camping prohibited at the Wharf Creek boat ramp (head of Lake Wanaka). The area is well used by boaties; campervans restrict the space for manoeuvring and parking vehicles, boats and trailers. Most campers that I have encountered at this site are inconsiderate and/or unaware of the purpose of a boat ramp.</p> <p>My overall reason for asking for these changes is that the area is well supplied with formal camping grounds - for example at Makarora West, Boundary Creek, Kidds Bush, and Lake Hawea. Campers, even self-contained ones, should be using these areas and paying the fees. Charges at the DOC sites are trivial, while the commercial camping grounds should be supported by council as they have all the facilities. In contrast, roadside overnight campers (even the allegedly self-contained) are associated with leaving rubbish and toilet waste.</p> <p>Finally, I did not see any reference to how these areas are likely to be policed. This may not need to be in the bylaw, but I'd like to see sufficient resources dedicated to enforcing the restrictions, otherwise the bylaw is just a joke.</p>	
32	Stephen Fowler	No	I am in favour of these proposed changes	<p>I am in favour of these changes as council needs to limit areas permitted for freedom camping particularly in residential areas, tourist hotspots and environmentally sensitive areas.</p> <p>Freedom camping is the "thorn in the side" of our tourist industry, anything that will reduce and contain the extent of freedom camping in the QLDC area and NZ is a positive.</p>	<p>In my opinion the Freedom Camping Act should be completely repealed.</p> <p>This type of tourism provides very little financial benefit to the local and national economy, if fact it is a cost to the rate and tax payers of this country. There is an element of freedom campers who are "free loaders" they have old vans with "self-contained" stickers on them spend very little money and generally abuse our environment.</p> <p>Until our government sees sense with this act we endorse the actions of QLDC but would like to see more council input in the following areas:</p> <ol style="list-style-type: none"> 1.Better and more prominent signage 2.Increased policing and infringements 3.Review of effectiveness and abuse of "self-contained" certification. 4. Council support and promotion of local campgrounds and motor camps.

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					We appreciate that QLDC has been very proactive in this area as the "front line" in NZ tourism.
33	Fergus Brown Holiday Parks New Zealand	No	I am in favour of these proposed changes	We support the move to introduce new prohibited areas and agree that free camping should be prohibited in all residential and built up areas. We agree that the Queenstown to Glenorchy road and the Mt Aspiring Road from Wanaka to Glendhu Bay should be included in prohibited areas. This will contribute to driver safety.	
34	Roger Fleming	No	I am partly in favour and partly opposed to these proposed changes	I don't believe the proposal goes far enough. The default position should be that freedom camping should be banned, with limited areas where it is authorised, not the other way around.	By providing facilities enabling freedom campers, it only encourages them. For example, why put toilets in the Red Bridge carpark when there's a perfectly good and almost free campground less than 2 kms away. If overseas visitors can't pay \$5-\$15 per night at the Luggate Camp or similar amounts at DOC sites in Albert Town, then in my view, they can't afford their overseas holiday to a destination like NZ at the far end of the world. Despite some people who would argue to the contrary, many of these freedom campers in their budget vans spend very little to nothing on a daily basis. Recently some interviewed on the TV news admitted \$20-\$30 a day is all they have in the budget. We need to be encouraging higher spending visitors rather than enabling those that spend nothing and eat 2 minute noodles all the way round our country.
35	D Cocks	No	I am in favour of these proposed changes	I am strongly in favour of expanding the prohibition of freedom camping to exclude residential areas and various parts of the rural environment when freedom camping on the side of roads is both dangerous and unsightly. I believe, however, that this bylaw doesn't go far enough on enforcement of the law, particularly as it pertains to non-self-contained vehicles. And, while the bylaw recognises that freedom camping is part of the NZ culture and a valued tourist experience it should also make it clear that providing freedom camping sites is not the responsibility of this council.	Like any legislation, this law will only be of value if it is properly enforced and this is where the QLDC has failed in the past. Enforcement is essential and needs to be fully resourced with committed personnel and equipment. The enforcement personnel cannot be the same staff expected to work a standard 9-5 hours five days a week. They need to work at night and early morning seven days a week. They need to strictly enforce the rules on both self-containment irrespective of "self-containment stickers" and on approved numbers of freedom campers at any single site as there is overwhelming evidence enforcement has been patchy in the past. Council should not provide any land, reserves, etc for freedom campers. It is not the core business of council to do so and it puts council in direct and unfair competition with commercial campgrounds. Indeed, part of council's enforcement campaign should be to persuade freedom campers in non-self-contained vehicles to stay at a nearby commercial campground or risk being clamped. Lastly council needs to clamp vehicles which have ignored advice to stay at a commercial campground. Issuing infringement notices is not even close to 100% effective. Clamping and a social media campaign will be far more effective.
36	Carol Hollebon Makarora Valley Organics	Yes	I have no opinion on the proposed changes	I have no opinion because the proposed changes do not include the area in which I live.	The Freedom Camping area in Makarora is too extensive and has not been addressed in the proposed changes. I believe that the area between the Makarora Township and Makarora West should not be a freedom camping area. There are enough sites for people to camp at without including driveways and river accesses. These include Boundary Creek, Davis Flat and the two caravan parks at the Country Cafe and Wonderland Lodge. I ask that Makarora be included in the proposed changes.
37	Will Hodgson Tucker Beach Residents Society	Yes	I am in favour of these proposed changes	Prohibited Freedom Camping area needs to be expanded to include both all of Tuckers Beach Wildlife Management Reserve and Tuckers Beach Recreation Reserve	Both reserves have significant wildlife such as native birds etc that need protecting. The areas are outstanding natural landscape character units with no buildings or other improvements. Our Society aims to maintain the natural character of the area for the enjoyment of all recreational users and is unanimous that the wilderness feeling would be severely compromised by Freedom Camping. A meeting held May 8 2017 by DOC and Tucker Beach Residents resolved that maintaining Tuckers Beach Reserves "feeling of wilderness and remoteness from Queenstown" be the key go forward.

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38	Terri Anderson	Yes	I am partly in favour and partly opposed to these proposed changes	<p>It's such a pleasure walking by the old Shotover Bridge nowadays without having to navigate partying campers, wads of toilet paper, and worse. Be bold and do the rest.</p> <p>We can have more logical laws addressing the actual problems if you adjust the interpretation:</p> <p>"Self-contained vehicle means a motor caravan, caravan, campervan, or any other vehicle designed and built for the purpose of camping for which a self-containment certificate has been issued under NZS 5465:2001."</p> <p>As there is no regulatory authority overseeing the issuing of these certifications, using them as the benchmark is fundamentally flawed. There is ample evidence of "valid" certificates being issued to vehicles that are not compliant with the new legal standard and the more appropriate standards (toilet that can be used when the bed is set up). This is the same as when NZTA wasn't managing WOFs correctly. We are enabling the unscrupulous to sell certification to the uncaring.</p> <p>So let's deal with the problem vans and stop pretending one size fits all. QLDC should redefine freedom camping according to a more stringent certification which we assess and enforce ourselves; a FIXED toilet that can be used at all time, with the door closed, and not cassette toilet. Big fines, taken immediately. That will get rid of most of the problem overnight without penalising the moms and pops who travel responsibly.</p> <p>There are still more areas that need protecting and your whack-a-mole approach just shifts the problem around to other vulnerable areas.</p> <p>Taxpayers and ratepayers should not be subsidising the tourism companies' business models with hundreds of thousands of dollars on camping hubs and ambassadors. Get FAI travellers back into camping grounds or they can share the love around the regions where they are needed.</p>	
39	robin martin	Yes	I am partly in favour and partly opposed to these proposed changes	<p>I would like the FC Bylaw 2019 to include the Tucker Beach Reserve as well as the TB Wildlife Reserve</p> <p>All the data and maps I can find suggest that Tucker Beach Reserve is not included in the intended area of prohibition</p>	<ol style="list-style-type: none"> 1. All prohibited areas need to be integrated or the spill will occur 2. Please see the minutes of the DOC and Residents meeting 8th may 2017 3. There must be good policing 4. No rubbish containers, no buildings etc in the area 5. Don't forget endangered birds in the area - dotterels 6. Future developments could include housing and cycle ways - how does that affect the decision
40	Debby Richards	No	I have no opinion on the proposed changes		
41	Rudi and Aggi Sanders	No	I am partly in favour and partly opposed to these proposed changes	<p>The proposed bylaw mentions prohibited, restricted and permitted areas for freedom camping. However, the maps only show the prohibited areas and doesn't define the rest of the areas. These areas could either be interpreted as restricted or permitted which might not have been the intention. Also, as the prohibited areas are fixed, there is no provision for (in this fast growing district) the status of future roads just outside the prohibited areas.</p> <p>We suggest to, per registered camping ground - with this camping ground at its centre - draw a circle with a radiance of 20km. Within this circle freedom camping is prohibited.</p> <p>Then draw another circle with a radiance of 30km. In the area between the 20km and 30km - line freedom camping is restricted. Outside the 30km-line freedom camping will be permitted.</p> <p>Instead of camping grounds the choice could be made to use town boundaries but as they keep changing this might be more difficult. As far as we're aware, the campgrounds have been in existence for many years and seem quite static. It also shows the clear correlation between camping, freedom camping, free camping and responsible camping.</p>	

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42	Chelsea Wallace Public Health South, Southern District Health Board.	Yes	I am in favour of these proposed changes	<p>Introduction</p> <p>Southern District Health Board (Southern DHB) presents this submission through its public health service, Public Health South (PHS). Southern DHB delivers health services to a population of 335,900 and has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. It seeks to promote equity and to reduce adverse social and environmental effects on the wellbeing of people and communities.</p> <p>This submission provides general commentary to the Queenstown Lakes District Council (QLDC) on the Proposed Freedom Camping Bylaw.</p> <p>General Comments</p> <p>PHS appreciates the opportunity to submit, and strongly supports the Proposed Freedom Camping Bylaw 2019. This submission outlines the importance of the bylaw and the positive effects it will have on communities.</p> <p>This bylaw is important to community groups as freedom camping has been the subject of complaints and media attention over the past few years. We recognise a need to address current freedom camping issues that have arisen in the Queenstown-Lakes district. We are of the view that encouraging this type of camping does not support the commercial camping ground industry (that is regulated to address the public health risks associated with it). Given the emergence of potential public health risks through current freedom camping practice, any policy should discourage it in built-up areas. We are of the view that restricting freedom camping to remote locations in areas managed by the Department of Conservation is appropriate.</p> <p>Submission</p> <p>PHS supports option 3, which adopts the Proposed Freedom Camping Bylaw 2019.</p> <p>We support the 2019 draft proposal which recognises the 2012 Bylaw but has been put into plain language. Simplifying the bylaw will make it easily accessible to those who use it. We also like the information on responsible camping as it appears on your website.</p> <p>PHS supports the current plan to extend prohibited areas for freedom camping to include the Lake Hayes Reserves and the Shotover River Delta. Issues with freedom camping are largely apparent in our district due to the high tourist population. Previous freedom camping in those locations has given rise to environmental impacts include noise, littering, incorrect disposal of wastewater and defecation (1). These environmental impacts can cause harm to public health and ultimately impact our 'clean green image.' This bylaw will help mitigate these issues, particularly in the residential communities close to these former freedom camping locations.</p> <p>It should be noted that taking away possible areas for freedom campers may put pressure on the remaining areas that are available to freedom campers. Encouraging self-contained vehicles as well as access to facilities (particularly a water supply, public toilets, wastewater disposal facilities and solid waste receptacles) at remote/freedom camp sites is important to manage potential public health risks.</p> <p>The responsible camping strategy is a good tool as it acknowledges public health and the impact that freedom camping has on the environment.</p> <p>Summary</p> <p>We would like to thank QLDC for the opportunity to comment on the Proposed Freedom Camping Bylaw 2019. PHS supports option 3 and anticipate this bylaw will restrict freedom camping and reduce environmental and public health impacts in the Queenstown-Lakes District.</p> <p>(1) Angus and associates. Freedom Camping Literature Review. 2017. https://tia.org.nz/assets/Uploads/cd0023cf72/Freedom-Camping-Literature-Review-Report-March-2018.pdf (accessed Oct 16, 2019)</p>	
43	Simon Williams	Yes	I am partly in favour and partly opposed to these proposed changes	<p>It's not enough. We live in the rural lifestyle precinct and last year we had a weekend where it would appear that our road was discussed on one of the many freedom camping forums. Waking up to find two almost naked 18 year old boys sleeping in their car at the top of your property when your teenage and younger children have been camping in the garden is just plain weird and scary. The freedom camping helpline were less than helpful. No one came. This car had already had its windscreen smashed by a farmer the night before where these two boys had camped in a farmer's field without his permission. There wasn't even a bogus certified vehicle sticker on this one. Repeat offenders who no doubt went on to do it again somewhere else that night.</p> <p>Later that weekend we had another two lots of campers. Needless to say after telling them it's not a campsite, word appeared to have got around. This however got me to thinking. As residents, we should be allowed to live on a road, not a camp ground. Take down those bloody signs for a start. If people can't camp on council land which has facilities, ie Lake Hayes, why the hell should they be allowed to camp outside someone's home?</p> <p>Where is the clause that you can't camp within say 500m of any letterbox? Where are the fines that actually make people listen? These campers know that your enforcement officers aren't going to come out of town, or off the main highway. They know that even on the odd chance they do, they'll just be partial to some 'education' and even then if they do get a fine, it's small enough for them to stomach once in 15-20 nights.</p> <p>I am all for responsible camping, however, not in residential areas, be that urban or rural residential. It's about time that this council started thinking about the people who live here and pay the rates, rather than pandering to tourists who come here expecting to be able to stay for free.</p> <p>We need to protect our rights to be able to explore the back country, away from residences, campsites and accommodation responsibly. We do not need to provide free accommodation to everyone.</p> <p>When I questioned those two young German boys, they told me they wouldn't dream of freedom camping in Germany, however it's a well-known fact that in NZ you don't have to pay your way. It's time for that to stop.</p> <p>Open up all Council Car Parks for Freedom Campers. Those with facilities for non-self-contained campers and stop it around homes. If you can't deal with the problems on your own properties then don't push it across to residents and then hide behind a bylaw saying it's OK for streets to become campgrounds. If they can't use their own toilet, or the ones already at Lake Hayes, they certainly won't be using them near our homes.</p> <p>Forget the warnings, go in with the wheel clamps, up the fines and low and behold by the end of this summer, we won't have any issues. If there really is a valid reason for that car / camper to be parked and was wheel clamped by mistake, then through the correct procedure the fine could be waived, I don't think that will occur often. We won't have any noticeable loss in revenue.</p>	

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44	Sue Bradley	No	I am partly in favour and partly opposed to these proposed changes	I would like to see a COMPLETE freedom camping ban in the Wakatipu Basin not restrictions here and there, messy. Make it simple for everyone, people coming here will understand that they must go to designated camping grounds and parking anywhere they like in this district is not an option. Easy to police and easy to understand.	
45	Bernard Fouke	No	I am partly in favour and partly opposed to these proposed changes	I think the changes are insufficient. Freedom camping should be prohibited within a stated radius of commercial campgrounds such as 20km. Absolutely no freedom camping should be allowed within the city limit of any township. Many rental agencies are making a mockery of the concept of “self-contained” vehicles. This Bylaw could define a strict definition of truly “self-contained” vehicles. All others must be required to use a campground with sanitation facilities. Any rental vehicle that is in violation should be immediately fined and the ultimate responsibility for paying the fine transfers to the rental agency who then can collect the payment from the renters.	
46	Christine Byrch	Yes	I am partly in favour and partly opposed to these proposed changes	<p>See my comments below that I think freedom camping should be banned. I don't think it should be called freedom camping but instead vehicle camping.</p> <p>3. Purpose. Delete clauses a and b from the purpose. The purpose needs to be very clear and specific. Clauses a and b add nothing to the bylaw and are not the purpose of the bylaw.</p> <p>4. Don't you think you need to explain or define 'freedom camping'?</p> <p>3.2 and part 2. This is the wrong approach. Rather than allowing camping everywhere it is not restricted or prohibited, it should be prohibited everywhere unless it is specifically allowed. Let us chose where freedom camping is allowed, not the freedom campers. And they should pay at these places. Your approach requires signs everywhere and is not as clear cut as saying camping is prohibited unless specifically allowed.</p> <p>5, 6, and 7. This is too complicated. Freedom camping should only be allowed by people in certified self-contained vehicles at specific places. Without self-contained vehicles, people must go to a camping ground with facilities.</p> <p>Schedule A appears to be missing? This will be key to how it all works and I don't think you will get good submissions without it. My view is that freedom camping should be prohibited everywhere except for a few places where it is allowed, well away from any lakes or streams, and should be paid for.</p>	<p>It is my view that there are too many freedom campers to allow this to continue. The environment and people's enjoyment of it are both suffering from the high numbers of freedom campers. Freedom campers set up at our most beautiful spots to the exclusion of day users. Their vehicles, tables and chairs and other paraphernalia take over our car parks.</p> <p>There has been a lot of talk of responsible camping but in my view this is not the reality. Campers leave rubbish wherever they camp, do not use on board toilets but prefer to go to the toilet in the bushes, they put rubbish in our re cycling bins, drive down our driveway looking for somewhere to camp, go to the toilet in our driveway, wash themselves their clothes and their dishes in our lakes and rivers, and so on.</p> <p>I suggest that freedom camping should be banned. If people want to camp, they should go to a camping ground. There is no obligation for New Zealand to provide free accommodation for freedom campers. If they have on board facilities, then they can go to a camping ground with no facilities. If they don't want to use their own facilities, then they can go to a camping ground with more facilities.</p> <p>If campers paid to camp, then I am sure people would set up camping places on private property and run them as a business.</p>
47	Sue Bradley Southern lakes wind riders club. Representing approx 50 local windsurfers and kite surfers.	Yes	I am in favour of these proposed changes	<p>Windsurfers and Kite surfers for many years have regularly used the area of "25mile creek " on the Glenorchy Road just before the one lane bridge, to practice our sports. This is one of the few SAFE places on the lake for us to enjoy our sports , especially for the kilters, which is why some of us travel all this distance from town several times a week to practice here. On a good windy day, you might see 15-20 kilters and windsurfers here, mostly locals.</p> <p>Since the explosion of this as a freedom camping area this once beautiful area enjoyed by locals has become a disgusting area littered with human waste, toilet paper, food waste, bottles and other rubbish. It has also meant there are a LOT of people around here who like to walk around, particularly in close proximity to the kilters. This is a real safety risk to them and to us. In the past there were lots of cars also parking on the beach. This has now been stopped (recently) but the new very small restricted area has pushed everyone into one small area, the area that we have always used. Locals can no longer launch boats, this is also a safety issue for us. And in general the new area is now really unpleasant and has lost its charm, the grass verges have been lost and we are now sitting in a gravel car park surrounded by huge dirt berms.</p> <p>We strongly feel that freedom camping should be banned from this area and the full area returned for general public access so that we can keep our smaller section as a quieter and safer area to enjoy our sports.</p>	
48	Paul Stenhouse	No	I am in favour of these proposed changes	Of the three alternatives outlined in the statement of proposal, accepting the proposed changes is my preferred option. However, if I was not limited to these three options then it is my opinion that the proposed changes do not go far enough in terms of controlling freedom camping.	<p>As stated previously, I do not think the proposed changes go far enough for several reasons: 1. The concept of "self-contained" vehicles is not fit for purpose as even though these vehicles may have a bucket that can be used as a toilet, most campers that I have talked to do not use them. 2. Commercial campgrounds have existed in the district for a long term and I think the council should be encouraging visitors to support these local businesses by restricting freedom camping within a reasonable radius of existing campgrounds. 3. Freedom produces a cost which is borne by the community and, except for a small number of business owners, I do not consider that this cost on the community is balanced by other benefits.</p> <p>While the effects of freedom camping would be minor if there were only a handful in the district, the sheer</p>

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					number of people who are freedom camping in the district means that a stricter approach is necessary. I see no reason why campers should not be forced to stay at a location with at least basic toilets/ablutions, and if they are not staying at commercial camping ground I think they should pay a small fee that covers the cost of servicing these facilities.
49	Mike Barker	No	I am partly in favour and partly opposed to these proposed changes	<p>I submit that the Council should proceed with Option 3 i.e. adopt an amended Freedom Camping Control Bylaw 2019, and revoke the Freedom Camping Control Bylaw 2012.</p> <p>I suggest the following amendments.</p> <p>1.) Section (6.2) states "A person may freedom camp in a restricted local authority area only if using a self-contained vehicle". However Section 7 where freedom camping is permitted states "A person may freedom camp in a local authority area marked as permitted in Schedule A of this Bylaw, whether or not using a self-contained vehicle".</p> <p>I submit that in areas where freedom camping IS permitted it should ONLY be allowed by persons using a self-contained vehicle.</p> <p>Further camping should only be allowed IF the vehicle is truly self-contained. Many vehicles showing the blue self-containment sticker do not actually comply with the regulations. Council officers or contractors enforcing the bylaw should be asked to check that the vehicle does comply i.e. have adequate water and waste storage and a self-contained toilet. If a vehicle does not comply that vehicle should not be allowed to camp and should be subjected to an instant fine sufficiently large to deter further camping.</p> <p>2.) Part 3 (8.1) A person may apply in writing to the Chief Executive of the Council for consent to freedom camp in a local authority area in which freedom camping is prohibited or restricted.</p> <p>I submit there should be NO Discretionary consent to freedom camp" i.e. freedom camping should be completely banned within prohibited areas.</p>	The Red Bridge freedom camping site has become so popular that there is not sufficient space for the number of vehicles wishing to use it. Often vehicles can still be seen down parked below the bridge. The area is still being used as a toilet and people washing dishes and themselves in the river. Use of this area should be more closely monitored. Perhaps a notice could be placed there informing users of proximity of the Luggage camping ground just a few km away.
50	Chris Shaw	No	I am in favour of these proposed changes	<p>I would like to make a submission in support of banning freedom camping along the Glenorchy - Queenstown road. As a regular user for kitesurfing and windsurfing along this stretch of road we have been running into problems for a number of years now. The main issue is at 25mile/ Creighton's just before the one lane bridge heading north. This is our main access point to the lake for practicing our sports and on a good day can be very busy. Kite launching and landing can be very dangerous and we are constantly having to deal with tourists wandering around in this area. This is compounded by the number of freedom campers at this location that have now been squeezed into the only place where we can park and access the water. These campers also leave a steady stream of rubbish and other waste making it a generally unpleasant place to hang out now. We are also now restricted from launching a safety boat here because of the large rocks used to control the freedom campers.</p> <p>I feel that if the area was returned to a general recreation area with no freedom camping it would be a safer and nicer place for all involved.</p>	
51	Peter and Agnes Oliver	No	I am partly in favour and partly opposed to these proposed changes	We feel that while the proposed changes are a move in the right direction, however they do not go far enough. The QLDC area, perhaps more than any other part of NZ, is becoming overrun by tourists, and this is having a serious negative impact on the quality of both the residential, holidaying, and tourist experience. Freedom camping is an unnecessary accommodation for tourists who can afford to travel the many thousands of kms required to reach NZ. Freedom campers, even seeming responsible ones, regularly flout even basic rules on disposal of waste, general environmental hygiene, and impingement on areas that other non-campers wish to enjoy using, such as for picnicking and fishing. Any provision for freedom camping in the QLDC area has the unfortunate unintended consequence of encouraging greater and greater numbers of tourists to choose this option, and eschewing paid accommodation options, including DoC camping sites and commercial camping grounds. We strongly favour a complete ban of any freedom camping in the entire QLDC area.	
52	Jay Berriman	Yes	I am in favour of these proposed changes	As a local resident and long-time member of the kite surfing community I have particular interest in seeing the conservation of the 25 Mile Public recreational area. This area and beachfront are used regularly by myself many other local kite surfers. Over recent summers I have witnessed the degradation of the stream, beachfront and current overnight camping parks with human waste, toilet paper and general rubbish. I support the ban along the whole of the Glenorchy Road for freedom camping in an effort to protect this largely self-managed area. I would also like to see the 25 Mile recreational area return to its previous vehicle access status once the camping ban is in place. Recent restrictions have been put in place that make it an unsafe and congested environment for launching and landing kites. It has created a smaller space that is hazardous and stressful for the local Kites and visitors.	

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53	Greg Urquhart	No	I oppose these proposed changes	<p>These changes seem to be a small extension of the current rather than the council actually showing leadership and listening to the residents. Banning a few more places and continuing to offer gravel car parks with Wi-Fi, toilets and showers free and paid for by the ratepayer is simply unsatisfactory. Council is competing with commercial operations trying to attract campers and also the campers are getting a poor experience by staying in a cramped gravel car park farther than being encouraged to stay in existing camp grounds. We all know that many campers display false and unregistered self-contained stickers, Council should include in the bylaws that ONLY vehicles with a separate shower/toilet should be allowed to freedom camp in the Lakes district. As a resident that had a full camper with peerage show and toilet I use to stay at the lake hays reserve...but now its closed, why as a resident and rate payer am I excluded from this reserve to freedom camp....I would imagine its coz of the influx of tourists in vans that were not actually self-contained. Do in summary</p> <p>-Close the council proved Free camps, educate via social media that all vehicles without separate showers and toilet are not allowed to Freedom camp anywhere.</p>	
54	James Cowie Albert Town Community Association	Yes	I am partly in favour and partly opposed to these proposed changes	<p>The areas banning or excluding so called freedom camping in the area Albert Town to Hawea do not go far enough and should, in the opinion of the Committee of the Albert Town Community Association, be extended. ATCA, therefore recommend additional areas to be included in a district ban are:</p> <p>1. The whole of the Albert Town Recreation Reserve to the east of SH6; ie that triangular area of the Reserve bounded by the Clutha and Hawea Rivers and SH6. The map attached to the Proposed Freedom Camping Bylaw 2019 is a gross representation of the area, making it almost impossible to define specific boundary lines. I, therefore, refer to the more detailed map attached to QLDC's Responsible Camping in the Queenstown Lakes District web page. As best as can be deciphered from this map freedom camping is allowable in a portion of the Reserve - away from the Clutha River boat launch ramp, but towards to the Hawea River and the Hawea section of the Albert Town Campground. Reasons to include the whole of the Reserve in the ban are:</p> <p>a. It is adjacent to a low-cost camp ground with basic toilet and rubbish collection facilities. It makes absolutely no sense, environmentally or commercially, to allow freedom camping right beside a Council authorised camp ground.</p> <p>b. Freedom campers using this area often park downstream of the boat ramp close to the river where they are visible to people on the river and living across the river, not to mention detracting from people wishing to fish from the bank.</p> <p>c. The reserve is increasingly used by walkers, people exercising their dogs and bikers.</p> <p>d. ATCA, in conjunction with Keep NZ Beautiful, organises clean up days in the Albert Town area, and over three years of clean ups this part of the reserve is where we pick up the most rubbish. Rubbish left by freedom campers was particularly noticeable in the last clean up (September).</p> <p>2. Templeton Park Reserve and the area adjacent to it bounded by the Clutha and Cardrona Rivers. The Responsible Camping map includes part of Templeton Park Reserve in the ban but appears to stop short of the strips close to the two rivers. The whole of Templeton Park and the area adjacent to the Rivers up to the car park for the Clutha River trail should be included in the ban. Reasons for this are much the same as given above - the area is popular for walkers, bikers and fishermen, but it is also close to houses. Further, it is an area where freedom campers can 'tuck away' amongst the bracken and dispose of rubbish with relative impunity.</p> <p>3. ATCA believes freedom camping should be banned between Hawea township and Albert Town, specifically:</p> <p>a. Along the length of SH6.</p> <p>b. Along Dublin Bay Rd and in and around Dublin Bay itself.</p> <p>c. Along Camp Hill Rd, and in particular in the two car parks at Camp Hill Bridge.</p> <p>d. Along Maungawera Rd.</p> <p>The reasons for extending a freedom camping ban to these areas are primarily that there are suitable camp grounds in the district; that the areas mentioned are popular with both local residents and other visitors and congregations of freedom campers detract from other 's use and enjoyment of such areas as Dublin Bay and the Hawea River in the vicinity of Camp Hill Bridge; that freedom campers in some of these areas can pose a fire risk (through their ignorance of fire conditions); and that freedom campers can and do degrade areas they regularly frequent, not only by those who leave behind rubbish and human waste, but by their very presence and adverse impact (real or imagined) on other users, visitors and nearby residents.</p>	
55	David Hawkins	No	I oppose these proposed changes	<p>The prohibition of freedom camping in certified self-contained vehicles in whole swathes of our district in my view goes against the spirit of the Freedom Camping Act 2011. You are making exclusion the norm whereas under the act prohibitions and restrictions are intended to be the exception and NOT the rule. I believe this bylaw contradicts the intention of the Freedom Camping Act and unnecessarily impacts on the freedoms and rights of New Zealand citizens exercising their legal right to enjoy New Zealand's towns and countryside. I believe the bylaw should only place prohibition in small sensitive areas where public health or environmental damage is likely to occur.</p>	
56	Charlotte Walder	No	I am in favour of these proposed changes		
57	Tess Hellebrekers	No	I am partly in favour and partly opposed to these proposed changes	The exclusion should be extended out to include West Wanaka. Nothing close than 10 km to a camping ground should be included.	Why are the camping hubs in Queenstown and Wanaka only for self-contained vehicles? Surely it would be better to get all vehicles there and then educate them about where they can go and if they are properly self-contained.

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58	Donald Lovett	No	I oppose these proposed changes	<p>Camping has been an option for generations. Overseas travel now seems to be the only holiday option for many New Zealanders.</p> <p>We promote our beautiful country and physical activity. There is a need to encourage New Zealanders to explore their own country both for the financial benefits to the country and the people as a whole. However, this activity is becoming increasingly restricted around the country. A factor not helped by the territoriality of some local residents who presumably travel during their own holidays. And, through some commercial interest attempting to restrict the activity for their own gain.</p> <p>Self-contained vehicles should have the option of using commercial camping grounds based upon a wish to go there. Not be forced to for the financial gain of the camp ground owners. Some responsible self-contained owners prefer commercial camping grounds others don't like commercial grounds, or like a mix. The idea that freedom camping takes money off commercial sites is questionable as responsible campers may just avoid the area if there is not the option. This affects patronage of other local enterprises. If they select the overseas holiday option the country suffers financially.</p> <p>There is a need to deal to the small percentage causing most of the problems. Some people only learn when the consequences are negative.</p> <p>From personal observation:</p> <ul style="list-style-type: none"> • Although "Freedom campers" seem to get the blame for rubbish, often it is caused by locals, day trippers in cars, and cyclist. Some responsible freedom campers tidy up rubbish, broken glass etc. left by others. • There is growing anger amongst New Zealanders over the increasing difficulty and restrictions of freedom when travelling in New Zealand. • Supposed Freedom camping problems appear to be sometimes used as a scapegoat by those with other agenda's. • Restricted certified only Freedom camping areas often have non-certified vehicles parked amongst the genuine certified vehicles. • Problems often appear to arise from a percentage of those in non-certified vehicles or small vehicles. Often young overseas visitors. • Many problems appear to arise because of restrictions limiting the numbers of spaces available or lack of knowledge regarding the 'rules'. • Obtaining the \$200 fines from overseas visitors is a problem needing a solution if enforcement is to be taken seriously. <p>The Government Responsible camping task force may solve some of these problems. But in the meantime a proactive innovative approach by Council's targeting the causes of the problems could lead the way.</p> <p>There is a need restrict the activities of those causing problems, not restrict responsible campers. Slowly more and more areas are being closed to responsible campers through the actions of a few or the agendas of others. It is New Zealand resident's freedom to travel and enjoy their country that is being affected. It also affects New Zealand as a preferred holiday option.</p> <p>Thank you for the opportunity to making a submission.</p>	
59	LA Campbell	No	I am partly in favour and partly opposed to these proposed changes	It does not go far enough in Wakatipu basin/Cardrona road. I have reported freedom campers going to toilet outside their 4/6 berth vehicles at paragliding park on crown range - also it's extremely dangerous when the lookout car park at top of zig zag has freedom campers parked up and pissing over the edge. Very dangerous when the lookout it full and cars block traffic coming up/down hill trying to get in there at dusk or first thing in morning. Ban Freedom Camping. Found people doing no 2s in driveway@police advised.	
60	Nigel Smith	No	I am in favour of these proposed changes	<p>I think they are a start but still far too little and far too soft.</p> <p>Too much tax payer money been wasted.</p>	<p>Education of freedom campers is a joke. The majority of them are just trying to exist for as little money as possible. We should NOT be providing free hubs for them. We live in a user pays society. No exception for free loaders, non-contributors to the economy.</p> <p>New Zealand is getting over run by low paying tourists. Knock it on the head NOW</p>
61	Marc Scaife	No	I am partly in favour and partly opposed to these proposed changes	<p>Vehicle-based freedom camping has exploded in recent years. At this scale it is unsustainable and not in the public interest.</p> <p>Our once unspoilt and uncrowded roadside reserves and rest areas are being polluted with human excrement, toilet paper and rubbish from freedom campers.</p> <p>The reserves and rest areas are being taken over by freedom campers and transformed into de facto camp sites. This causes overcrowding and crowds-out local day time users, and detracts from the enjoyment of these areas. Camping activities such as cooking, washing, showering and toileting, campfires, clothes washing and drying etc are not compatible with normal day use of these areas. They belong in a designated camp ground.</p> <p>The various methods adopted by QLDC to mitigate the adverse effects of freedom camping are flawed:</p> <p>educating freedom campers to be more environmentally conscious will never work. The bulk of freedom campers are from overseas and are transient. They have no vested interest in maintaining an environment that is not theirs and they will not visit again.</p> <p>Banning freedom camping in some areas of the district will simply move, and exacerbate the problem in other areas of the district. It is doubtful that any of our district 's roadside reserves or parks can adequately cope with the pressure from freedom camping without becoming de facto campgrounds and thus crowding out local daytime by locals for which they were created in the first place.</p> <p>Whist it is possible for QLDC to set up new, special and designated areas for freedom camping, there is no good rationale for doing so. This approach amounts to publicly funded and subsidised tourist camping. There is no reason for local ratepayer's funding to subsidise tourists. The long term goal of QLDC should be see the re-emergence of private, fee charging campsites. In the short term, QLDC should ban freedom camping and direct freedom campers to existing dedicated campgrounds and where these are lacking, it may be necessary, in the short term, for QLDC to set up designated campgrounds. But these sites should be user-pays.</p>	

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				<p>In the long run the private sector and DOC will provide the necessary campgrounds. But this will only occur if the option of free-riding freedom campers is eliminated through a freedom camping ban.</p> <p>In short, banning roadside freedom camping is justified not just on social and environmental grounds, but also to reap the commercial or narrow economic benefits of tourism.</p>	
62	Sadao	No	I am partly in favour and partly opposed to these proposed changes	<p>It is great to see the proposal for expansion of control areas, especially along Queenstown-Glenorchy road. I have seen increasing of cars, vans and campers parked for a night along the road last three years. A lot of human faeces and pieces of toilet papers are found behind bush and lakeshore in camping hot spots, which creates huge concerns of public health and environment impact to our waterways and reserves.</p> <p>I would like to see the statement include Glenorchy Paradise road and Paradise Routeburn road to the control area. They are sealed roads and campers, who are not able to find any freedom camping spots on Queenstown Glenorchy road, easily extend their drive beyond Glenorchy township. This could push the problem, which has already been seen on Queenstown Glenorchy road, towards our pristine countryside. The potential hot spots would be near bridges where the view opening up. Human faeces or pollution could be washed away from those spots and running into the rivers, Dart and Rees Rivers, then the lake. More houses are also being built along the road between Glenorchy township and Rees Valley road intersection. The statement needs to proactive about covering certain future control areas before problem occurs.</p> <p>I would like to see the statement include State Highway 6 between Jacks Point and Kingston as it is windy road (same reason as Queenstown Glenorchy road stated on the statement of proposal bullet point 26), it runs along the lakeshore (public health and waterway pollution concern) and these roadside reserves have already become overwhelmed hot spots (as campers have pushed away from the control areas and those are only places they can freedom camp with lake view).</p>	
63	John Binney Mt Barkers Residents Association	Yes	I am partly in favour and partly opposed to these proposed changes	<p>Prohibited area needs to be extended east of Wanaka as per document below</p> <p>Freedom Camping Bylaw 2019</p> <p>SUBMITTER</p> <p>This submission is made by the Mt Barker Residents Association (MBRA). This association has a current membership of 121 and represents those residing within or adjacent to, the area bound by State Highway 6 to the north, Mt Baker Rd to the south and the Cardrona River to the west. The land is generally zoned Rural or Rural Residential.</p> <p>PROPOSED BYLAW MODIFICATION REQUESTED</p> <p>The proposed Freedom Camping Bylaw 2019 includes a section 'Draft Freedom Camping Bylaw 2019 Maps'. MBRA requests the Prohibited Area shown on the Wanaka map is extended to include the area as marked up on the copy of the Wanaka map attached to this submission. The area marked up covers the land bound by</p> <ul style="list-style-type: none"> - Riverbank Rd to the west - State Highway 6 to the north - Mt Barker Rd to the south <p>REQUIREMENT FOR FREEDOM CAMPING PROHIBITION</p> <p>Freedom camping must be prohibited in this area for the following reasons</p> <ol style="list-style-type: none"> 1. The area includes the fragile environment of the Cardrona River. Freedom camping has been regularly observed along the banks of the river, particularly in summer and autumn. The only source of water for drinking and ablutions is the river and unfortunately the seclusion of the area encourages fouling of both land and river. The usage of this area for Freedom Camping is also inconsistent with feedback from local residents at recent ORC consultation sessions on the future of the Cardrona. Residents repeatedly highlighted the value to the community of an undegraded Cardrona River. 2. The area is of rural character where QLDC ratepayers have purchased land to enjoy the peace and serenity of the rural environment. This is consistent with QLDC zoning of the land. White and green camper vans or converted vehicles with blue stickers on the back, of dubious legality, parked within this area is not consistent with the type of environment being promoted by QLDC and expected by its ratepayers. 3. The regional growth being promoted by QLDC will only see more residents seeking land in this area to escape the inevitable high-density developments with the urban environment. Residents will expect to enjoy the serenity of the area without the loss of amenity through freeloading freedom campers. 4. There are a number of roads through the area that are unsuitable for freedom campers seeking suitable parking for the night. Most roads are narrow and could not be classified as two way. Even the long awaited potentially sealed Ballantyne Rd is accepted as having suboptimal engineering standards. Having the additional load of freedom campers travelling and parking along these roads creates additional and unnecessary safety challenges for both campers and residents. 5. There are no public facilities for water supply, ablutions or liquid waste dumping in the area. However, there are QLDC approved under-utilised camping facilities available adjacent to the area at Luggate, Albert Town, Clutha Outlet as well as in Wanaka itself. There is also the Council funded facility at Red Bridge. Therefore, proposed Freedom camping restrictions in the area will not create undue hardship for these visitors. 6. MBRA contend the amendment sought is consistent with the philosophy applied by QLDC in extending prohibitions elsewhere in the district to include areas of increasing residential density. It must be recognised that this prohibition must be sufficiently forward looking to serve the community through to the next bylaw review at some undefined future date. Now is the time for QLDC to get it right. 	

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64	Erena Barker	No	I am partly in favour and partly opposed to these proposed changes	<p>I submit that the Council should proceed with Option 3 i.e. adopt an amended Freedom Camping Control Bylaw 2019, and revoke the Freedom Camping Control Bylaw 2012.</p> <p>I suggest the following amendments.</p> <p>1.) Part 2 (6.2) states "A person may freedom camp in a restricted local authority area only if using a self-contained vehicle". However Section 7 where freedom camping is permitted states "A person may freedom camp in a local authority area marked as permitted in Schedule A of this Bylaw, whether or not using a self-contained vehicle".</p> <p>I submit that in areas where freedom camping IS permitted it should ONLY be allowed by persons using a self-contained vehicle.</p> <p>Freedom camping should only be allowed IF the vehicle is truly self-contained. Many vehicles showing the blue self-containment sticker do not actually comply with the regulations. Council officers enforcing the bylaw should confirm the vehicle does also display the Self-Containment Warrant Card/Window Card as required according to NZS 53465:2001.</p> <p>2.) Part 3 (8.1) A person may apply in writing to the Chief Executive of the Council for consent to freedom camp in a local authority area in which freedom camping is prohibited or restricted.</p> <p>I submit there should be NO Discretionary consent to freedom camp" i.e. freedom camping should be completely banned within prohibited areas.</p>	Freedom camping, especially for those using 'slider vans', is a serious issue in the Upper Clutha area. The privilege of being able to park and enjoy our environment is being abused. Council and enforcement officers should issue an instant fine for those camping illegally (as per the helpful Certified Self-Containment information on the 'Backpacker Guide' website).
65	Bruce Spedding Windsurfing New Zealand	No	I am in favour of these proposed changes	Windsurfing New Zealand supports the submission made on behalf of the Windsurfers and Kite surfers of the region, particularly regarding the road section known "25mile creek " between Queenstown and Glenorchy. Recreational activities like these are only practical and safe in certain locations, so the sailors value and look after these areas as they cannot just 'go somewhere else'. This has been amply demonstrated around the region by the care and maintenance that has been carried out by these sports people. These activities and locations are both nationally and internationally famous, and are an attraction for sailors outside the region with obvious economic benefits. The growth in freedom camping, and the use and abuse of these valued spaces has led to conflict in terms of maintenance, access and safety. This is a growing problem across many recreational areas throughout New Zealand, and allowing freedom camping to make an activity difficult if not impossible is a situation that has no up side. It is important to preserve the recreational assets of the region, and the good will of the participants in those sports in recognition of the value they bring to the community and region with their sports. We fully support the proposal to restrict includes prohibition on two sections of road identified as 'hotspots' for freedom campers where environmental harm has occurred, those being Glenorchy Road between Queenstown and Glenorchy,	
66	Peter Colmore-Williams	No	I am partly in favour and partly opposed to these proposed changes	In my view ratepayers don't own the council land they just have access to it and like all the council owned land in NZ, including that of DOC and others like them, it's there for the benefit of all ratepayers of NZ and we each share our council land with others as they pass thru it. just because the rate payer owns a piece of land across the road from a council reserve that is a coastal or lake site shouldn't give them any rights to exclude various uses of that land by the council, even if that means allowing freedom camping.. we as a nation need to get more into sharing and not giving exclusive rights to people who don't own the land.	
67	Andrea Kendrick	Yes	I am partly in favour and partly opposed to these proposed changes	<p>In support of greater restrictions where to freedom camp, however feel this needs to be increased, to ensure that there are no freedom camping areas within 30km of a campground (either commercial or Department of Conservation) or residential dwellings.</p> <p>For example, the current map shows a prohibited area which stops just past Glendhu Bay. This will encourage people to go past Glendhu bay and towards West Wanaka to camp. There is no prohibited area identified at West Wanaka or Dublin Bay for example.</p> <p>Self-containment needs to be enforced and strict emphasis placed on the current standard of 'self-containment' to include a usable toilet, when the sleeping area is set up in the vehicle. Until further development of a 'self-containment' identification this requirement requires stronger enforcement.</p> <p>What I oppose in the proposed changes is the Purpose regarding points (a) and (b) The PURPOSE of this bylaw needs to be focusing on point (c) first and foremost and to remove the focus on promoting it as a 'valued tourist experience' Revert to the</p>	Would like to see our Reserves, water ways and access to water ways protected by prohibiting freedom camping in these areas, including 'NZMCA camps' particularly where visitor numbers are high and the impact on the resident population becomes more noticeable, visually and physically.

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				purpose outlined in the 2012 bylaw that focused more on protection of our environment and the people that live and use the area for recreation.	
68	Cath Gilmour	No	I oppose these proposed changes	<p>I support the submission by NZMCA on review of the 2019 Freedom Camping Bylaw. In particular:</p> <ul style="list-style-type: none"> -I think the changes made are disproportionate to the supposed effects they are trying to avoid. -It is unfairly restricting the majority of responsible campers - many of them New Zealand families and retirees - because of a perception that they behave like the minority of travellers in small rental vans/cars with portable toilets that are never/rarely used. - That the problem would be more fairly - and profitably, for the district - be tackled by upping the level of "self-contained" status required to freedom camp in this district to ensure a permanently plumbed and accessible toilet. There is the capacity to do this within current law. - To instead have a blanket rejection of all freedom campers but for the two designated sites will mean a considerable loss to the district in terms of visitors (and locals who want to, as they have traditionally been able to, camp responsibly in their own district) and the resultant visitor spend. - That the proposed bylaw changes go totally against the presumption of the Freedom Camping Act - and against your own research findings, that the majority of freedom campers are responsible. -We support the contention that the review process used has not been full and proper, perhaps because preparation of it has been left too late in the piece. The result will likely therefore be poor policy, made without due consideration and analysis, to the detriment of everyone. - Freedom campers with fully self-contained vehicles are much more likely to choose to avoid Queenstown Lakes District then pay \$70 a night to use their own resources. This will be to the detriment of the local economy. As well, obviously, as those who would have liked to visit Queenstown Lakes, and their family and friends who live here. - Reading through the freedom camping information online, the only place I actually saw the two sites that have been identified as the potential freedom camping areas were listed under the "information for local residents" section. Maybe I missed it somewhere else - but if so, it certainly isn't clearly visible on the brochure or on the website. If we are going to lock people out, at least we should be upfront about it. 	

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69	Randall and Allison Aspinall Mt Aspiring Station	Yes	I oppose these proposed changes	<p>We live 40 km from Wanaka on the Mt Aspiring Road and own and run Mt Aspiring Station. Due to our experience from living here and seeing freedom camping first hand almost daily we welcome the opportunity to submit on the proposed freedom camping bylaw 2019. We would accept Option 1 or Option 2 as a placeholder until the Responsible camping strategy can be effectively implemented. We would prefer a fourth option of no Freedom Camping on the entire length of Mt Aspiring Road. We do not support Option 3 (particularly on the Mt Aspiring Road) because:-</p> <ul style="list-style-type: none"> o It is not solving the issues, just concentrating them further out into the Rural Zone. o If freedom camping is allowed in the District it should be allowed at spots that have toilet facilities e.g. Millennium Trailhead, Roys Peak rather than pushed to areas without any facilities. o There are very few, if any bottlenecks or hazardous situations caused by campers between Waterfall Creek & Glendhu Bay • We believe that the proposed bylaw that extends the no freedom camping zone to Glendhu Bay will not reduce the amount of rubbish and toileting issues caused in the district but simply move these further along the road and concentrate them into a smaller area. • The narrow nature of the road from Waterfall Creek to Glendhu Bay is given as a reason for extending the exclusion zone however we do not agree that this is the case. We drive the road 6 - 20 times a week (often early in the morning or late at night) and it is very rare to find someone camped in a spot that restricts traffic or creates a potential hazard. Most traffic issues are caused during the day by through traffic stopping to take photos etc. • If it is agreed that freedom camping should be permitted in the QLDC region it does not make sense to shift those campers away from areas with toilets and rubbish bins (Roys Peak, Mt Aspiring Lookout etc) into areas with none of these facilities. It will not reduce the amount of human waste or rubbish deposited in the District but simply push it further out into the rural zones and cause it to be dropped in nature (rather than toilets/bins). • Since DOC have pushed freedom campers out of the Diamond Lake carpark we have already seen an increase in camping at smaller sites such as the Motatapu Gravel Pit, Motatapu rock climbing area, Treble Cone turn-off, Matukituki gravel pit, Glenfinnan Creek, Hells Gates and OBHS bridge. Option 3 will not reduce the amount of freedom camping simply push it further into the rural areas. We have concerns that the QLDC will view that the problem has gone away if freedom campers are further away from more densely populated areas. - "out of sight out of mind". • Excluding freedom campers from areas such as Roys Peak Carpark allows parking space for walkers. However, with many walkers starting in the early hours of the morning it may be preferable that these walkers park overnight and are able to use the toilet provided before setting off on their walk (rather than parking in areas where there are no toilet facilities). <p>Before further bylaws are introduced a broader approach needs to be implemented. The QLDC Responsible camping strategy 2018 addresses some of these issues and, actually Implementing this strategy well would go a long way towards addressing the issue with freedom camping in the QLDC region. However we feel that certain elements are missing:</p> <ul style="list-style-type: none"> • Inclusion of adjoining / affected landowners in the management of this strategy through organisations such as the Walking Access Commission should be considered. A large number of freedom campers cross or are near private land causing impacts for individual land owners. • There is a focus on no freedom camping in areas of more population with less concern over impacts for rural areas. • There needs to be more clarity/education around what a self-contained versus non self-contained (or freedom) camper actually is to our visitors and the wider public. <p>While freedom camping has long been part of the New Zealand holiday experience, the freedom to camp comes at a cost largely born by council, rate payers and communities. Freedom camping is therefore not "free". We would like to see consideration of this and strategies to ensure the Responsible camping strategy is funded and implemented by those who are using it.</p> <ul style="list-style-type: none"> • Perhaps a system where one night is allowed for walkers or a small fee paid with a ticket in the window of vehicles may provide a solution to excessive people abusing this and a way of providing revenue to enforce it to allow parking space for recreational users in car parks such as Roys Peak. • With the proposed bed tax not capturing freedom campers but leading to increased costs at camping grounds it is likely that the number of campers choosing to freedom camp will increase. Council needs to consider more effective ways to manage this group of visitors and their impact before implementing the tax and increasing the cost of staying at a campground. o Perhaps by providing incentives for campers to utilise camping grounds that already provide suitable facilities • If freedom camping was banned district wide then money that is being spent on freedom camping hubs, ambassadors, public toilets and rubbish collection could instead be spent ensuring that campgrounds can keep their off-season rates lower and more acceptable to our low budget visitors. This would have the additional benefit of pushing many freedom campers out of the busy summer period into the shoulder seasons which is already one of Lake Wanaka Tourisms targets. 	
70	Jonathan & Toni Bird	No	I am partly in favour and partly opposed to these proposed changes	Our submission is that all 'Freedom Camping' within the Queenstown Lakes District be prohibited on all public land and that all Freedom Campers are directed to certified commercial campgrounds.	
71	R Fulton	No	I am in favour of these proposed changes	<p>We are in favour of the proposed changes, however, we do not think the restricted areas go far enough. Specifically we think no freedom camping should be allowed on Timaru Creek Road after Johns Creek.</p> <p>We also believe that the changes take only a short-term view, which get a process started but need more robust medium-long term rules implemented going forward. For example, no freedom camping with X km of a settlement or no freedom camping down a dead end road after a dwelling are possible improvements.</p> <p>We strongly agree with your statement that the cost of providing or auditing this camping should be borne by the ratepayer. Current funding from central government is short term and will lead to long term costs for council. It appears</p>	

	Name	Heard	Support/Oppose	Stance on the Freedom Camping Bylaw 2019 proposed changes:	Additional Comments
				that a sensible alternative is to have low cost user pays hubs such as NZMCA are establishing. This is something that could be considered as it meets the funding need and controls the environmental damage (rubbish and sewage etc). Finally well done for being proactive and starting a change process when others just pretend the issue will sort itself out.	
72	John Taylor	Yes	I am partly in favour and partly opposed to these proposed changes		I wish to support the submission of the Guardians of Lake Hawea. Two matters I wish for the Queenstown Lakes District Council to pursue: 1. To lobby central government for both LINZ and DOC areas to be included within the Act so that these areas are subject to enforcement of their council bylaws. 2. To lobby for the Act to cover the enforcement and payment of all proper Infringement Notices issued. The people infringing the bylaws should not be able to avoid paying their fines.
73	Ann-Louise Stokes	No	I am partly in favour and partly opposed to these proposed changes	Whilst I am pleased to see that the area in which Freedom Camping is not permitted has increased I think we are just pushing the environmental problem further out into farmland and smaller streams. The other morning there were over 20 campervans at the top of the Crown Range at 6am, despite having stickers saying that these vehicles are self-contained we all know that this is not the case, these stickers can be obtained over the internet for the price of a coffee. We should not be making Freedom Camping available in the QLDC. We should be encouraging them to go to camping grounds at all costs. We seem to be so scared of offending tourists but locals and tourists alike are sick of smelling human excrement in our environment. We don't want tourists that think it's okay to defecate in our countryside. We should be working with the camping grounds to provide an area for these 'self-contained' vehicles, not providing Wi-Fi and cleaning hubs.	
74	Erna Spijkerbosch	Yes	I am partly in favour and partly opposed to these proposed changes	Refer separate submission	
75	Arrowtown Village Association	No	I am in favour of these proposed changes	Refer separate submission	
76	James Imlach NZMCA	Yes	I oppose these proposed changes	Refer separate submission	
77	Responsible Campers Association	No	I oppose these proposed changes	Refer separate submission	
78	Alison and Neal Brown	Yes	I am partly in favour and partly opposed to these proposed changes	Refer separate submission	
79	Sarah and Richard Burdon	No	I am partly in favour and partly	Refer separate submission	

	Name	Heard	Support/Oppose	Stance on the Freedom Camping Bylaw 2019 proposed changes:	Additional Comments
			opposed to these proposed changes		
80	Guardians of Lake Hawea	No	I am partly in favour and partly opposed to these proposed changes	Refer separate submission	
81	Richard Hutchinson	Yes	I am partly in favour and partly opposed to these proposed changes	Refer separate submission	

Erna Spijkerbosch, long term rate payer (and holiday park operator)

I understand the need for this Bylaw and the issues around the topic.

Had this Bylaw been notified with all the required information I probably would not have made a submission. However, this is not the case. The manner in which it has been notified makes it necessary to make assumptions and I don't believe that can end up with a result which is clear and not open to challenge or misinterpretation.

I am aware of persons who, like myself, read the council agenda item – incorrectly labelled maps and all - and that person was planning a submission based on the agenda item. The assumption being that these maps would populate the very empty Schedule A. Given that those maps were incorrectly labelled this could have interesting results.

I have had communications with several QLDC staff members advising me what the Bylaw is saying. Each have had a slightly different take on the Bylaws meaning.

I can only submit on what has been notified.

Purpose

3.1 *a) encourage responsible freedom camping in the district*

However, there is no map or description advising where this may take place despite Clause 7 7.1 stating there is. It also states – *Marked as - permitted in Schedule A whether or not using a self-contained vehicle.*

Submission :- Unless one puts it up in the hills all vehicles should be self-contained.

(b) recognise freedom camping as part of Aotearoa New Zealand's culture and a valued tourist experience;

Where are the maps that show where one can do this? If they are yet to come, then the Bylaw has been notified without full information. NZ's culture of freedom camping is in the back country and not in a self-contained vehicle. Self-contained vehicles are a recent incarnation.

(c) control freedom camping in order to protect the environment, including the District's lakes and rivers, from harm.

Submission :- With the lack of full information I fail to see how this outcome will result.

Part 2 – Restrictions on Freedom camping.

5 5.1 Schedule A is silent on any maps ie empty. One can assume the maps, once approved, will be there but an assumption is not a matter of law.

Submission:- I agree with the Prohibited areas in the maps.

6 **6.1 /6.2** Again Schedule A is silent and there are no maps showing restricted or permitted to look at or comment on.

7 7.1 Freedom camping permitted

Again, Schedule A is silent and there are no maps showing permitted areas nor any wording to indicate restricted areas. If all other areas in the total district are Restricted say so on the maps. A simple note would cover it.

Submission:- given that lack of maps to comment on one must come to the conclusion that all areas not showing as Prohibited on the maps, are in fact the, areas permitted for freedom camping. This would indicate all roadside areas, pull off bays or non prohibited public land is suitable for parking a camper, caravan or motorhome are permitted camping areas “*whether self-contained or not*”.

Submission:- If there is not the intent to show areas where freedom camping can take place, either self-contained or even if not self-contained then does the Bylaw comply with the requirements of the Act?

I notice that Schedule A is now headed up Prohibited and Restricted Areas, not simply Maps as per the 10th October agenda. As per comment above add comment to amps and cover this off properly.

Not being able to view any ‘Restricted’ maps I can’t submit on them as to do I agree or not.

Quote from a staff member

If the maps don’t show any permitted areas, then the answer is there are none, and everywhere else is restricted. BUT the maps don’t show this.

Submission:- The Act states **Bylaws must not absolutely prohibit freedom camping**

(1) A local authority may not make bylaws under section 11 that have the effect of prohibiting freedom camping in all the local authority areas in its district.

(2) This section is for the avoidance of doubt.

This Bylaw (one can only assume) is saying that there will be Prohibited areas and Restricted areas over the whole district.

And I am comfortable and can agree with for the Wakatipu Basin but not so sure for Wanaka’s more remote areas.

However why have Clause 7.1 at all?

I do wish to attend the hearing and to speak.

Erna Spijkerbosch

Queenstown

Arrowtown Village Association – Submission to Queenstown Lakes District Council Proposed Freedom Camping Bylaw 2019 – November 2019

The Arrowtown Village Association (AVA) is a volunteer-run incorporated society that represents the views of residents to local, regional and national government. We take up issues of public interest and work to improve and develop new amenities to meet the needs of the growing and diverse community in Arrowtown.

The following points we raise are directly relevant to the vision of the Shaping our Future Arrowtown (SOF Arrowtown) report. The AVA was in 2018 appointed guardian of the finalised SOF 2017 report

- SOF is a visioning document for Arrowtown compiled by an intensive community consultation process and the approval of QLDC.
- SOF is the most recent, community driven, vision for Arrowtown

The AVA speaks for the association's members in this case by reference to the SOF report and the community consultation from which it was finalised, irrespective of the views or interests of the individual committee members.

The AVA has encouraged members to make individual submissions based on their personal opinions.

The very special nature of Arrowtown, its unique character, its historical heritage, and its tourist potential all mean that careful monitoring, guardianship and management is required. All community driven documents highlight the desire to preserve, retain and enhance the authenticity of Arrowtown which is a village cherished by the community and both New Zealand and International visitors.

The AVA supports the proposed Freedom Camping Bylaw 2019 as we recognise its protection of Arrowtown village. It is necessary to exclude freedom camping within Arrowtown, and along the main feeder routes leading into the village in order to protect the special character that is Arrowtown.

The Shaping Our Future (SOF) report for Arrowtown, has the core principles of

- Heritage
- Character
- Community
- Environment

The following statements and recommendations from SOF highlight that restricting freedom camping within Arrowtown is entirely appropriate as should such activity be allowed it potentially contravenes these findings.

ARROWTOWN COMMUNITY VISION 2050 AND BEYOND

- *A vibrant, diverse community that is pro-active in managing its future in a way that values and sustainably protects its heritage, character, lifestyle and the natural environment*

Heritage:

- *Arrowtown is a living, ever-changing town that respects, retains and celebrates its heritage, character and amenities. Heritage continues to be an economic driver for Arrowtown*
- *QLDC rigorously uses its statutory documents (District Plan and Arrowtown Design Guidelines), to ensure that the rich heritage status of Arrowtown continues to be maintained. This includes buildings, plantings, features and landscapes*

Character:

- *The character and amenities valued by Arrowtown residents and visitors today are carried forward into the future.*

Community:

- *Car-centric transport is affecting the ambience of the town with parking and congestion*

Environment:

- *Arrowtown's natural environment is valued as a foundation of community well-being. We actively care for our town's drinking water, clean air, native flora/fauna, natural and heritage landscapes, town greenscapes, and we accept the shared responsibility to ensure these are sustained and enriched*

We thank you for the opportunity to support the QLDC Proposed Freedom Camping Bylaw 2019 and respectfully request that our views are noted.

Additionally, the AVA would like QLDC to actively consider the removal of freedom camping potential from the Whitechapel Recreation Reserve. This suggestion is based on the large community push back when this area was suggested to be made an official camping hub in 2018. The AVA acknowledge this would require further action not within the current bylaw time frame, but is happy to discuss this in detail given the strength of community feeling about this area expressed at the time.

Noel Beggs
Chairperson
Arrowtown Village Association
November 2019



New Zealand Motor Caravan Association Inc.

***YOUR JOURNEY
STARTS HERE***

Queenstown Lakes District Council

Draft Freedom Camping Bylaw 2019

Submission from the NZMCA

08 November 2019

nzmea.org.nz

PO Box 72147 Papakura 2244



SUBMISSION TO	Queenstown Lakes District Council
REGARDING	Proposed Freedom Camping Bylaw 2019
DATE	08 November 2019
SENT TO	Regulatory Department Queenstown Lakes District Council PO Box 50072 Queenstown 9348 services@qldc.govt.nz
SUBMISSION AUTHOR	James Imlach National Manager – Property and Policy
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WISH TO SPEAK	Yes

Introduction

1. The NZMCA welcomes the opportunity to submit on the Proposed Freedom Camping Bylaw 2019 (**the bylaw**). For over a decade, the NZMCA has urged QLDC to recognise, through its camping-related policies and bylaws, responsible campers travelling in genuine certified self-contained (**CSC**) motorhomes and caravans. Please find enclosed a legal opinion from Kensington Swan in support of our submission.
2. Queenstown is a popular tourist destination for New Zealanders and international visitors alike. We empathise with QLDC's unique challenge in trying to accommodate visitors while managing the negative effects¹ of freedom camping. Up until now, QLDC has been agile and demonstrated leadership by trialling new rules and processes designed to improve the management of freedom camping in New Zealand.
3. QLDC has long maintained the problems in Queenstown are primarily generated by a small minority of visitors, and that campers travelling in genuine CSC motorhomes and caravans are the responsible folk². In our view, the bylaw³ is very misleading and unclear on the local authority areas where responsible camping is prohibited, restricted and permitted, and it unfairly prohibits the vast majority of responsible campers from enjoying freedom camping throughout the district. Based on the statement of proposal (**the SOP**) we are not convinced the bylaw is most appropriate and proportionate⁴ response to addressing the relevant problems in Queenstown. In fact, the thrust of the bylaw disregards the premise and expectations passed down by Parliament in 2011.
4. Unfortunately, it appears that the vast majority of responsible campers (that QLDC has no issue with) are collateral damage in a battle to control the poor behaviour of a minor few.

Recommended solution

5. The NZMCA recommends at least allowing CSC motorhomes and caravans with fixed toilets to freedom camp within the prohibited areas. While this is not our preferred solution (as many appropriate CSC vehicles have portable toilets) we accept it is a pragmatic compromise that addresses QLDC's principal concern with vehicles containing portable toilets. It also protects the rights of the vast majority of responsible New Zealanders travelling in CSC vehicles, while avoiding the common overcrowding issues at designated sites.
6. As noted in the enclosed legal opinion, QLDC may consider adopting our solution without the need to re-consult on the bylaw.

¹ Relevant to section 11(2) of the Freedom Camping Act 2011, e.g. overcrowding and public defecation

² For example <https://www.stuff.co.nz/national/100876280/live-queenstown-mayor-jim-boult-makes-freedom-camping-announcement> @4.41min and 10.43min and <http://www.scene.co.nz/opinion/jim-boult-tackling-the-freedom-camping-rule-flouters/>

³ Based on the content and layout of the proposed bylaw maps, statement of proposal site descriptions, and QLDC's online interactive map

⁴ Section 11(2)(b) of the Freedom Camping Act 2011

About the NZMCA

7. The NZMCA is a non-profit club representing over 91,000 individual New Zealanders who share a passion for exploring our country at leisure in their CSC motorhomes and caravans. Some 900 individual members reside in Queenstown-Lakes and many of them enjoy freedom camping in their own backyard.
8. Formed in 1956, the NZMCA is one of (if not the) largest domestic tourism organisations in New Zealand and is projected to surpass 100,000 individual members in 2021.
9. The NZMCA and its members pay property rates, GST and income tax all of which help fund the development of public infrastructure enjoyed by visitors and New Zealanders nationwide. QLDC has received some \$3.5 million dollars of government funding to build new public toilets and supplement the costs of monitoring services to reduce the burden on local ratepayers.
10. The NZMCA financially supports new infrastructure development through public-private partnerships. Over the past two decades we have partnered with numerous local authorities to co-fund the construction of hundreds of public dump stations and other tourism facilities nationwide. The NZMCA continues to work alongside Local Government New Zealand and its members, financially supporting community projects that benefit local authorities and the tourism sector.

Freedom camping – a traditional activity

11. Assuming QLDC wants a bylaw that supports responsible camping, it must accept freedom camping is not merely an activity undertaken by young overseas tourists travelling on a shoestring budget. Parliament has recognised that freedom camping is a traditional activity enjoyed by tens of thousands of Kiwi families every year⁵. NZMCA members value the privilege and opportunity to explore New Zealand and freedom camp in a variety of locations, including urban, residential, town centre, rural, and remote areas. The end of our submission includes feedback from members explaining why they enjoy freedom camping in the areas that QLDC prohibits.
12. When discussing the presumption of the Freedom Camping Act 2011 (**the FCA**), the Hon Kate Wilkinson (then Minister of Conservation) stated

“Freedom camping is a valued tradition in New Zealand, as we have heard, and this Government wants to ensure that it stays that way....The presumption is that people can camp unless a location is specifically restricted....This bill is purposely pro-camping, as we recognise that the majority of freedom campers are responsible and take great care to clean up after themselves.”

⁵ https://www.parliament.nz/en/pb/hansard-debates/rhr/document/49HansD_20110817_00000001/freedom-camping-bill-in-committee-third-reading

13. The bylaw does not uphold this presumption, nor does it reflect the pro-camping premise of the FCA. The bylaw also fails to recognise QLDC's findings that most freedom campers are responsible.

14. When discussing the benefit of the FCA to New Zealand families the MP for Christchurch Central, Nicky Wanger, stated

"The [Act] for the first time, enshrines the right of New Zealanders to go freedom camping as a default setting. New Zealanders can camp as of right on public land and Department of Conservation land, unless there is a good reason not to allow it...In creating these by-laws, [local] authorities need to prove that there is a real problem. This bill ensures that they can no longer impose blanket bans and it will give consistency across the country...[Local] authorities can impose those by-laws within only very limited geographical areas."

15. We submit the intent of the bylaw is to effectively prohibit freedom camping and the prohibited zones cover vast geographical areas within the district.

16. The National MP for Taupo, Hon Louise Upston, also gave Parliament a personal account when discussing the purpose of the FCA:

"...the main point I want to make is that [the Act] is about protecting the right of New Zealand families to camp, I want to give a personal example. I was raised camping by the lakes, by the rivers, and by the beaches. I remember times with my son when staying in a camping ground was not affordable at the time. So we would pack up the borrowed tent, jump in the car, and drive to a place that was yet undiscovered."

"This bill protects the right of New Zealanders to have those kinds of adventures in this country because it will stop the blanket [ban] by-laws."

17. The bylaw does not protect the ability for New Zealand families to freedom camp in many areas they also desire, e.g. alongside lakes and rivers. The bylaw continues to protect the interests of commercial campgrounds (including those QLDC receives financial benefit from).

Comments on the Statement of Proposal

Predetermination and improper consultation

18. QLDC emailed the NZMCA on 11 September 2019 requesting feedback on the current bylaw prior to drafting a new bylaw for public consultation. Relevantly, the request noted QLDC:
 - Did not envisage any significant changes to the current bylaw;
 - Will consider, as part of its strategy, introducing a higher standard of self-containment if there was a delay in reviewing national standards; and
 - Preferred to expand on the prohibited areas.
19. In the context of a full review, QLDC should maintain an open mind to making significant changes following public consultation, and not predetermine the only suitable option is to expand the prohibited areas. As it stands, the draft bylaw increases the scope of prohibition across the district and further erodes the number of suitable opportunities for our members to freedom camp. In our view, this is significant change.
20. The NZMCA responded to QLDC's request on 19 September 2019 reiterating its practicable solution to enabling responsible camping in prohibited areas. While we understand QLDC was not obligated to adopt our recommendation, it is not clear the recommendation was ever considered prior to releasing the bylaw for public consultation.
21. Soon after the bylaw was released for public consultation, QLDC updated its responsible camping webpage and marketing collateral⁶. This latest information, widely circulated throughout the tourism industry and local communities in preparation for summer 2019/2020, includes a revised online map that not only reflects the proposed prohibited areas, but also expands on them. The discrepancy between the existing bylaw maps, proposed bylaw maps, and online maps is extremely confusing, and our members are again at risk of receiving invalid infringement notices.
22. The same information promotes the general premise of the bylaw even though it is still out for public consultation. We believe QLDC has predetermined the outcome of the bylaw review and prematurely circulated public information on the presumption the bylaw will be adopted without change (or with further expanded prohibited areas according to the online maps).
23. It seems QLDC is not following a proper review and consultation process nor has it considered our recommended solution prior to determining the need for the bylaw in accordance with sections 11(2) and 13(5)(c) of the FCA. The SOP confirms a full review of the bylaw has not taken place and a full review of the prohibited areas will not be undertaken until the year 2022. This approach appears to undermine the purpose of a full review as the FCA envisages.

⁶ <https://www.qldc.govt.nz/events-and-recreation/responsible-camping/>

24. We are concerned the truncated review process⁷, driven by QLDC's priority to adopt a new bylaw before summer, will render the current proposal *fait accompli*.
25. We do not believe QLDC should treat the full review process as a mere formality to ensure it can legally continue to enforce its bylaw. Kensington Swan's legal opinion outlines the requirements for a full review. QLDC must consider our proposal with an open mind, and not predetermine the outcome before or during the consultation process, as appears to be happening.

Amenity effects

26. QLDC considers the need to protect private residential amenity as justification for widespread prohibition. Arguably, a bylaw for the purpose of "protecting the area" only extends to a bylaw necessary to prevent physical damage to the local authority area; such as damage to flora and fauna or to any structure; or by depositing waste. This can be inferred from the offence provisions at section 20 of the FCA which regulate these matters but do not regulate amenity effects. Even if section 11(2) of the FCA enables bylaws to protect visual amenity, it would seem illogical and inappropriate to prohibit freedom camping in areas that continue to permit recreational visitors and day parking without restriction.

Overcrowding

27. QLDC suggests widespread prohibition is necessary to avoid overwhelming freedom camping areas as they restrict access for local residents. Our solution advocates for dispersal of freedom camping opportunities because of the issues that develop when confining freedom campers to a handful of designated sites. At is stands, QLDC is offering two single sites for freedom camping across the entire district. Based on the high volume of visitors travelling to Queenstown each year, it is likely both sites will succumb to overcrowding issues.

Disproportionality

28. Last year, QLDC prohibited scenic areas that our members traditionally enjoyed visiting, following community complaints about the use of improper CSC vehicles. The NZMCA supported the community petition. However, we objected to the final outcome as the community petition never advocated for outright prohibition on responsible campers and the new bylaw was disproportionate to the perceived problems. QLDC now reports that frequent complaints from the public relate to freedom camping generally, rather than any unlawful behaviour and that internal data suggests only a small number of campers break the law compared to the larger number of lawful campers visiting the region. That being the case, we remain confused as to why it is still necessary to widely prohibit responsible camping.

⁷ <https://www.stuff.co.nz/national/116515922/queenstown-lakes-could-be-freedom-camping-freeforall-after-council-bungle>

Virtual prohibition

29. QLDC advises freedom camping is permitted (with restrictions) outside the prohibited areas, however it also acknowledges there are very few options available to freedom camp beyond the prohibited areas and that other rules further prohibit freedom camping within the restricted areas, e.g. the default provisions under the Reserves Act 1977, reserve management plan policies, and the prohibitions made by the Department of Conservation.
30. Most of the land “restricted” by the bylaw is under private ownership or regulated by NZTA, LINZ or the Department of Conservation. The combined effect of the bylaw and other statutory rules means there are very few suitable areas under QLDC control able to accommodate responsible camping. Arguably, the bylaw has the substantive effect of creating a virtual ban on freedom camping across the district. We note such an outcome supports QLDC’s lobbying of central government for law reform that would enable it to ban freedom camping throughout their district⁸.
31. The presumption QLDC’s bylaw and management regime is welcoming to responsible campers, and that New Zealanders have ample opportunities to freedom camp on local authority land outside the prohibited areas, is extremely misleading.

Comments on the Proposed Bylaw

32. The bylaw is well structure insofar as it avoids unnecessary repetition and superfluous detail. However, Schedule A differs to the SOP and does not identify the permitted areas referred to in section 7.1. We understand these errors will be corrected in the final bylaw, although it does undermine the consultation process as not all relevant information has been made available to submitters.
33. We recommend adopting our recommendation to at least permit CSC vehicles with fixed toilets within the prohibited areas. We are informed QLDC supports the proposal but does not want to go out on a limb, just yet. However, it would consider the approach more closely if central government declines its recommendation for law reform.
34. The Government has confirmed there are no immediate plans to review the premise of the FCA. Furthermore, during the most recent review of NZS 5465 the Standard Development Committee (including central and local government representatives) made it clear there was no appetite to amend the Standard in line with QLDC’s recommendations. We reiterate the Standard outlines the minimum requirements for certification and QLDC has the autonomy to

⁸ For example <https://www.stuff.co.nz/national/100876280/live-queenstown-mayor-jim-boult-makes-freedom-camping-announcement> @6:51 Mayor Boult advising a total ban on freedom camping is "not off the table", also stating QLDC needs to be fair to commercial campgrounds by only allowing freedom camping in less attractive areas which they can give effect to by expanding the prohibited areas across the district.

raise the bar if there is a genuine need to do so. QLDC is the only authority that has significant problems with vehicles with portable toilets. Amending the Standard would be unfair on the majority of other local authorities who actively welcome CSC vehicles with portable toilets.

35. QLDC has a history of leading the way for local government. For example, it adopted NZS 5465 into its original bylaw back when very few other local authorities had FCA bylaws. QLDC also trialled the infringement collection regime with rental operators.
36. With the above in mind, we believe QLDC should consider adopting our proposal.

Responsible camping in urban areas

37. There is a misconception that camping as an activity is not appropriate in the urban environment and therefore should be confined to more remote areas. However, according to the online maps at least 14 commercial campgrounds operate within the urban environment (and every one of those commercial campgrounds is protected by a surrounding prohibited area). Because of this, and QLDC's stated position that it must be fair to campground operators by prohibiting freedom camping in attractive areas, we are concerned the bylaw is being used for an improper purpose.
38. There are many reasons why responsible camping is appropriate in urban areas. The following quotes received from NZMCA members this year explain the importance of freedom camping in urban areas to motorhomers. Our members visiting Queenstown want to park overnight within proximity to township amenities and the homes of their friends and family. The bylaw unfairly prevents them from doing so.

"Freedom camping in townships and urban areas is very convenient for us. We can do our laundry, stock up on groceries, and eat out. We will make a conscious effort to freedom camp in smaller towns and support local businesses as they support us being there. We will bypass a town that does not provide a safe and convenient place to park overnight" **Brenda Graham & Ross McGregor (Christchurch)**

"We are exploring New Zealand fulltime now and love freedom camping. We stay almost exclusively in towns or urban areas for two main reasons: (1) Jude has a disability and cannot walk unassisted. Being close to town means we can look around and shop at our own pace; and (2) we feel much safer staying in town, particularly as it takes a while for us to get in and out of our motorhome. We do not feel safe freedom camping in remote areas." **Jude Black & Paul Lawrence (Papamoa)**

"We enjoy freedom camping in towns as it provides opportunities to park up our motorhome and go out for dinner or breakfast, or to go shopping. We love supporting local businesses, however if we are not welcome then those towns will simply miss out on our business." **Paula & Torsten Baker (Wellington)**

"We purchased our motorhome three years ago. We're still townies at heart and love camping in townships and urban areas when on the road or visiting friends. Close proximity (i.e. walking distance) to townships and shops is important for us as we like to spend a lot of time and money in cafes, restaurants, supermarkets, farmers markets, clothes shops, and at local events etc. We enjoy staying in a variety of locations, including freedom camping areas, low cost sites, NZMCA parks and campgrounds. We value the free and low-cost parking options that many towns provide and will always spend money as a show of appreciation." **Heather & John McMurdo (Blenheim)**

"Owning a motorhome makes it easier for us to visit friends and family around the country. It is often more convenient for us to park outside their homes and sleep inside the motorhome overnight. Banning this will make it difficult for us to continue to visit our friends and family." **Neil Hellewell (Christchurch)**

"We go out of our way to support local businesses and spend money in towns that welcome motorhomers. If the overnight parking areas are easy to get to and enable us to stay close by, we will eat out at local restaurants and explore the town." **Averil & Robin Williams (Southland)**

"We love motorhoming in towns and have done so in several countries. The convenience of parking in town allows us to shop around and spend money. We find the better the facility the more the town benefits." **Geoff & Jo Kidd (Christchurch)**

"We love freedom camping as well as visiting public campgrounds, DOC campsites and NZMCA Parks during our travels. Freedom camping, particularly in rural and provincial towns, is a fantastic and easy way for us to learn more about a town's past. We are more inclined to spend money in local shops and visit tourist attractions run by local residents when we are staying in town. As retirees, if we are forced to stay in campgrounds all the time, we will not be able to afford to travel as much as we do, while learning about New Zealand's rich history and supporting a wider range of local businesses." **Christine & Darryl Avery (Foxton Beach)**

Clamping

39. We expect QLDC will continue to clamp vehicles, which NZMCA believes is in breach of the bylaw. Sections 37 and 38 of the FCA set out the remedies available to QLDC where vehicle seizure may be necessary. In our view, the FCA does not provide for clamping as an additional punitive measure, particularly when section 37 requires enforcement officers to issue warnings in the first instance. Issuing a \$200 infringement notice along with a \$200 clamp release fee is clearly in breach of what the Act considers a fair process and reasonable fine for minor offences.

8 November 2019

New Zealand Motor Caravan Association
4 Graham Road
Takanini 2112

Attention: James Imlach

Queenstown Lakes District Council - DRAFT Freedom Camping Bylaw 2019

- 1 You have asked us to review and comment on the validity of the Queenstown Lakes District Council's draft Freedom Camping Bylaw 2019 ('**Draft Bylaw**') that was issued for consultation on 11 October 2019.

Draft Bylaw

- 2 The Draft Bylaw appears to contain errors and inconsistencies when read alongside the Statement of Proposal which accompanies it.
- 3 Clause 5.1 of the Draft Bylaw states that no person may freedom camp in a local authority area marked as *prohibited* in Schedule A of the bylaw. The maps at Schedule A show various urban areas in the region and certain roads as a "Proposed Prohibited Area". The Proposed Prohibited Areas are Arrowtown, a section of road through Cardrona Valley, Frankton & Lake Hayes, a section of road through Gibbston Valley, the Glenorchy-Queenstown Road (including the townships of Glenorchy and what appears to be Kinloch at the edge of that map), Lake Hawea, Wakatipu Basin and Wanaka (including the section of road from Wanaka to Glendhu Bay).
- 4 Clause 6.1 provides that any local authority area not marked as prohibited or permitted in Schedule A is a *restricted* local authority area.
- 5 The Statement of Proposal which refers at sections 21-23 to "Proposed new prohibited areas". This includes more areas than are shown as prohibited on the draft Schedule A maps. Although the maps are less than clear, we presume the maps are intended to prevail so we take this to mean that the urban areas in Jacks Point/Wye Creek, Kingston, Makaroa, Alberttown and Luggate will be restricted (as opposed to prohibited) areas for freedom camping, notwithstanding the description in the Statement of Proposal.
- 6 Clause 7.1 of the Draft Bylaw states that a person may freedom camp in a local authority area marked as *permitted* in Schedule A of this bylaw whether or not using a self-contained vehicle. However, we are not able to locate any areas on the Schedule A maps which are marked as "permitted".

Special consultative procedure

- 7 To ensure that the Freedom Camping Bylaw that is ultimately introduced is not *ultra vires*, the Council needs to ensure that in carrying out the special consultative procedure, it complies with the requirements of the Local Government Act 2002 ('LGA').

Requirements for consultation

- 8 The requirement for a special consultative procedure are set out in sections 83 and 86 of the LGA. These requirements are mandatory. The Council must also comply with the principles set out in section 82 of the LGA.¹ In summary, those obligations are that:²

[T]hose affected should have access to relevant information in an appropriate format and be encouraged to present their views having been given clear information as to both the purpose of the consultation and the scope of any likely decision. Further, a council must ensure that interested or affected parties have a reasonable opportunity to present their views, and that those views are received by council with an open mind.

- 9 Subject to strict compliance with sections 83 and 86, the Council otherwise has a discretion to determine how it complies with the section 82 principles.
- 10 The Courts have provided the following guidance as to how the Council's discretion must be exercised:
- a Consultation decisions must be rational and consistent with the objects of the LGA and the particular controlling provisions.³
 - b Although the Council is not obliged to follow submissions or recommendations made during consultation, the Council must give proper consideration to the views presented to it during the consultation process.⁴
 - c A decision can properly be described as having been made after consultation if there is a process which enables those consulted to express their views in a fully informed way, and the decision maker must enter the consultation with an open mind, taking due notice of what is said before making a decision.⁵
 - d The phrase "open-minded" has been interpreted in the context of consultation under the LGA as follows:⁶

I am satisfied that "open-minded" in contexts such as the present does not mean "without predisposition" but "prepared, despite predisposition, honestly to consider whether to change its mind".

¹ *Gwynn v Napier City Council* [2018] NZHC 1943 at [61].

² *Wellington City Council v Minotaur Custodians Limited* [2017] NZCA 302 at [38].

³ *Wellington City Council v Minotaur Custodians Limited* [2017] NZCA 302, [2017] 3 NZLR 464.

⁴ *Ulrich v Wellington City Council* HC Wellington CP174/96, 29 July 1996; *The New Zealand Motor Caravan Association Incorporated v Thames-Coromandel District Council* [2014] NZHC 2016 at [109].

⁵ *Pascoe Properties Limited v Nelson City Council* [2012] NZRMA 232 (HC), citing *Wellington International Airport Limited v Air New Zealand* [1993] 1 NZLR 671.

⁶ *Friends of Turitea Reserve Soc Inc v Palmerston North City Council* [2008] 2 NZLR 66 (HC) at [102].

- e As part of its obligation to have an open mind, the Council must demonstrate a genuine willingness to listen and the Council must not have predetermined the outcome before or during the consultation process:⁷

What is my judgment is required is no more and no less than this. The Council must come to the meeting which the s.230 resolution is to be considered with an open mind as to whether the land in question should be sold. The Councillors must be prepared to give a fair and open minded hearing to anyone who appears at the meeting and submits for whatever reason that the land should not be sold. If it could be shown that the Council had not approached the meeting on that basis, then the resolution to sell would prima facie be invalid and, subject to any relevant discretionary matters, liable to review. What I am saying is that in my judgment, in the particular statutory and factual setting in which this case is concerned, anyone challenging the s.230 resolution on the basis of pre-determination or fettering of discretion is required to show actual pre-determination or fettering rather than the appearance of the same.

- 11 The Council's responsible camping web page⁸ contains geo-maps for public information about where freedom camping is prohibited. Although the Draft Bylaw has not been introduced yet, these maps already show as "prohibited" the new areas which are noted in the Statement of Proposal as prohibited areas to be added. Luggate, Lake Hayes Estate and Jacks Point are examples. The geo-map therefore does not accurately represent the current status of prohibited areas in the region under the existing bylaw and creates a risk for the Council that the consultation process could be perceived to be predetermined. We note also these geo-maps are inconsistent both with the position shown on the printed maps attached to the Draft Bylaw and the position stated in the Statement of Proposal, which is confusing.

Duty to re-consult

- 12 We understand NZMCA has noted that Council staff appears to be concerned that if any changes are made to the Draft Bylaw arising out of the consultation process, then the Council would have to re-consult on the changes which would add to the cost and time of completing the process.
- 13 However in our view, the duty to re-consult is only triggered where there is a substantial change in approach or significant new information, not for more minor issues where it could be assumed that relevant interested parties would be unconcerned.⁹ We, therefore, see no reason why the Council could not introduce some changes of this nature into the Draft Bylaw, without having to re-run a consultation process before the Draft Bylaw is introduced.
- 14 We understand that in its submission on the Draft Bylaw, the New Zealand Motor Caravan Association ('NZMCA') is proposing some suggested changes to the Draft Bylaw that do not

⁷ *Travis Holdings Limited v Christchurch City Council* [1993] 3 NZLR 32 (HC) at 31–32.

⁸ <https://www.qldc.govt.nz/events-and-recreation/responsible-camping/>

⁹ *New Zealand Pork Industry Board v Director General, Ministry for Primary Industries* [2013] NZSC 154; *Electra Ltd v Commerce Commission* (2005) 2 NZCCLR 378

result in any increase in the negative impacts of freedom camping that the bylaw is attempting to avoid.

- 15 In addition and as set out in sections 46-48 of the Statement of Proposal, parties' submissions on the Draft Bylaw will be publicly available and able to be considered by other submitters, before the hearings on the proposal are convened. The process allows for the Council to receive written and oral submissions at the hearings (even where a party has not previously made a written submission and the Council considers special circumstances apply). This would enable other submitters to comment on any matter raised by the NZMCA in its submission.

Compliance with the Freedom Camping Act

- 16 The Freedom Camping Act ('FCA') gives effect to Parliament's intention to generally permit freedom camping in local authority areas unless it is restricted or prohibited. Local authorities are empowered to make, amend or revoke freedom camping bylaws under section 11(1) of the Freedom Camping Act, but the exercise of that power is subject in particular to sections 11(2)-(3) and section 12.
- 17 Section 3(3) provides that the "...powers of regulation under the Act do not allow for freedom camping to be prohibited on all land controlled or managed by a particular local authority..."
- 18 Section 12 also provides that a local authority "must not make bylaws under section 11 that have the effect of prohibiting freedom camping in all the local authority areas in its district." Case law confirms that something less than a total and complete prohibition may still have the effect of a prohibition substantively and for all practical purposes.¹⁰
- 19 In making a bylaw under section 11(1), Council must be reasonably satisfied that:¹¹
- (a) the bylaw is necessary for 1 or more of the following purposes:
 - (i) to protect the area;
 - (ii) to protect the health and safety of people who may visit the area;
 - (iii) to protect access to the area; and
 - (b) the bylaw is the most appropriate and proportionate way of addressing the perceived problem in relation to that area; and
 - (c) the bylaw is not inconsistent with the New Zealand Bill of Rights Act 1990.
- 20 The High Court in *NZMCA v Thames-Coromandel District Council* confirmed that¹² necessity is a strong concept and the question of whether a bylaw is necessary:¹³

¹⁰ *Schubert v Wanganui District Council* [2011] NZAR 233 (HC).

¹¹ Section 11(2) and *The New Zealand Motor Caravan Association Incorporated v Thames-Coromandel District Council* [2014] NZHC 2016 at [99].

¹² [2014] NZHC 2016.

¹³ At [101].

...will involve not only a consideration of the Bylaw's terms, but also problems that might arise if the bylaw is not made, as well as other means available to a Council of dealing with those issues.

- 21 This involves a requirement on Council to consider alternatives before making a decision to prohibit freedom camping.
- 22 The Court also found that the Council is more likely to have met its obligations under section 11(2) where its decisions are based on records of complaints made by residents and observations and actions taken by enforcement officers.¹⁴ We consider those complaints would have to be relevant to the criteria in section 11(2)(a) to support a decision to prohibit.
- 23 The Council is correct that the bylaw will be automatically revoked on 19 December 2019 by operation of section 13(6) of the FCA as it has been seven years since the Freedom Camping Control Bylaw 2012 was introduced without a review by Council. The Statement of Proposal confirms that the Council is not intending to amend the existing bylaw, but that the old bylaw will be revoked and replaced with an entirely new bylaw.
- 24 As the Council is making a new bylaw, the FCA appears to require the Council to carry out a full section 11(2) analysis for all areas where it is proposed to restrict or prohibit freedom camping, including those areas which may have been prohibited in an earlier bylaw. It might not be enough to ensure compliance for Council to effectively accept the prohibited areas in the existing bylaw and then add to them, rather than stepping back and assessing whether a prohibition in those areas is still necessary and the most appropriate and proportionate way of addressing the perceived problem.
- 25 The Statement of Proposal provides limited information against which we can assess whether the Council has properly complied with section 11(2). It is not apparent from the Statement of Proposal that the Council has attempted to distinguish between the various areas where freedom camping is to be prohibited and reports of problems associated with freedom camping at those areas. Although the Council states that it has considered that the bylaw is the most appropriate way of addressing the issues, no further detail is provided.
- 26 It is also not clear from the Statement of Proposal whether the Council has explored alternative options to prohibition, including the options that are outlined in its own Responsible Camping Strategy 2018 (which is endorsed by the Mayor, the Department of Conservation, Land Information New Zealand, the NZ Transport Agency and the Ministry of Business, Innovation & Employment) such as:
- a treating different groups of campers differently as not all campers are alike or present the same problems;
 - b improving self-containment standards and
 - c providing temporary hubs for limited overnight camping and for washing and waste disposal.

¹⁴ At [107].

- 27 We recommend that the NZMCA raises these issues (along with any other matters that it considers appropriate) in its submission on the Draft Bylaw. The Council will be aware that if it does not correctly follow the requirements of the special consultative procedure and/or if it fails to comply with the FCA, the bylaw would be open to review.
- 28 Please do not hesitate to contact us if you would like to discuss further.

Yours faithfully
Kensington Swan



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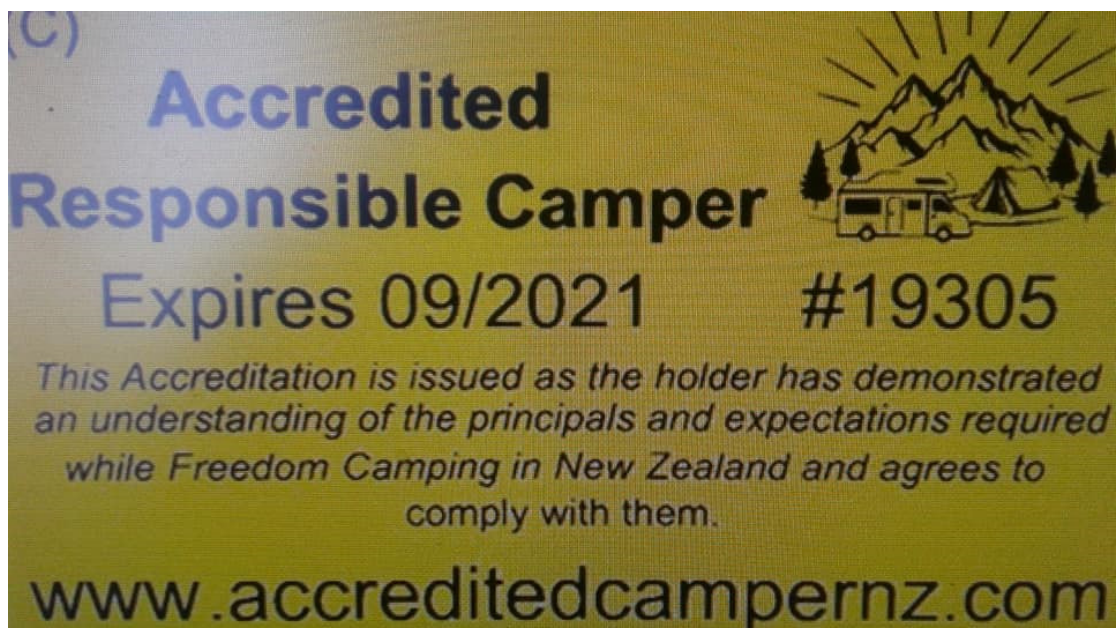
Responsible Campers Association Incorporated

Submissions

Queenstown Lakes District Council

Freedom Camping Bylaws

7th November 2019



Responsible Campers Association Incorporated (RCAi) thanks Council for the opportunity to make submissions on proposed Freedom Camping Bylaws.

RCAi was formed in January 2017 to give a voice to all campers as defined by the Freedom Camping Act 2011 (FCA). All campers as defined by that Act are represented by RCAi regardless of mode of camping, club membership or whether camping is participated as a sideline to another recreational activity. This effectively means we represent the majority of campers in New Zealand.

We have surveys Councils, campers and other stake holders in an effort to identify issues so we may partake in informed discussions and provide real solutions which include all Freedom Campers.

To that end we developed alongside other stakeholders, an “Accredited Responsible Campers Program” which was launched early 2019, and includes the much needed education into the responsibilities and expectations of Freedom Camping. On successful completion of the education and a questionnaire, Campers who choose to, may apply to receive an Accredited Campers Card which is issued to the person and valid for 2 years.

This program has received accolades from DOC, Minister of Tourism, Councils and other stakeholders, with a number of Councils using our education program as a basis for their own and using other elements of our work to move forward.

Of particular note is that prior to our report dated March 2018, Freedom camping education appeared to be non-existent and we highly recommended that as the greatest need. Unfortunately, 6 months prior to starting writing the report, we saw amendments made to the NZS;5465 (Self containment of Motor Caravans) which saw solutions to people using roadsides as toilets effectively banned from some smaller campers where as what was required was education in their use.

We are pleased to note that as a result of our report, many Governments Depts, Tourism NZ, Industry organizations and other stakeholders are now educating Campers. We continue to monitor many of these education programs for matters of accuracy and when found wanting, we request that changes be made. To date we have had a 100% success rate with these requests.

Submission

While acknowledging the unique problems that Queenstown faces in regards to freedom camping, RCAi also acknowledges the need for Freedom camping within the Queenstown District. We are particularly alert to the need to have budget accommodation available in order to attract seasonal workers to fulfill the many job opportunities created during the high-season.

RCAi are also aware that herding Campers into specific areas, in breach of the Freedom Camping Act, creates a perception of a problem worse than what it is. RCAi notes "14..... Frequently complaints from the public are about freedom camping generally, rather than any illegal or unlawful activity from campers,....."

RCAi requests for further background information relative to this issue as well as others have gone unanswered by Council. It is somewhat difficult to make meaningful submissions to Council without knowing the background information supporting the proposed bylaws.

Council appears to be unaware of the differences between 'Certified Self Containment' (CSC) and 'self containment'.

Self containment simply being the ability to retain one's waste until it can be properly disposed off in facilities fit for purpose. Self containment (without certification) is available to everyone regardless of the mode of camping whereas CSC is exclusive and only available to a minority of Freedom Campers and recent consultation has concluded it is non-compliant with NZ Bill of Rights Act.

RCAi note a Council bylaw currently being developed defines ‘Self Contained Camping’ as the ability to meet the individual campers ablutionary and sanitary needs without requiring external services, nor relying on public facilities or discharging or disposing any waste into the environment. Certification is NOT a requirement and the emphasis is placed solely on the person camping. RCAi note at this time, that a camper accredited under our program is able to be responsible for a group of up to 5 campers using the same single camping unit (Tent, Bivouac, Caravan etc). Our program also allows for the use of public toilets so as local ratepayers merely wanting a night at the local beach / lake are not unreasonably preventing from doing so.

Bill of Rights (BORA)

RCAi are concerned Council has never seen, or considered, the guidelines to the Bill of Rights published by Justice Department. Link here;
<http://www.justice.govt.nz/assets/Documents/Publications/Guidelines-to-Bill-of-Rights-Act.pdf>

Several issues become apparent when studying these guidelines and how they relate to Freedom Camping.

- 1/ The right to movement is also clarified as being a right to remain on public land*
- 2/ Any restriction has to be ‘justified in a fair and democratic society’*
- 3/ Any restrictions have to be as least restrictive as possible*
- 4/ Compliance is also required to be easily achieved by persons so affected.*

As BORA relates to NZS;5465 (self containment standard), the situation as currently held by Councils that use the NZS;5465 as a restriction is found ‘wanting’.

NZS;5465 as a restriction, has never been required as there are other means of achieving the same results though use of the existing Littering and Hazardous waste disposal bylaws / legislation - Bylaws and legislation which the FCA gave increased enforcement methods such as instant fines etc to. NZS;5465 goes over and beyond what was required to achieve its goals, (fresh water / venting stipulations) while also only being applicable to a minority of the Campers defined by the FCA (Caravans & Motorhomes).

In terms of compliance, NZS;5465 requires meeting a standard with facilities many campers may never use and meeting those requirements for a minimum period of 3

days - hardly practical for a night at the beach/ lake etc or even for week ends away as most persons are only away for maximum 2 nights on a normal weekend. As every Council has differing bylaws around self containment (certified or not) it is not easily able to be complied with for travelers moving throughout our Country.

RCAi is aware the statement made by LGNZ in the ‘Good practice guide to Freedom Camping’ published April 2018 that

“The High Court has also considered the NZBORA issue⁵ as argued by the above interest groups and dismissed claims that freedom camping bylaws, which also prohibit non-self-contained vehicles across the district, are in breach of NZBORA”

has been found wanting. Neither RCAi nor other stakeholders during the consultation process found any such determination to have been made. Refer;

<https://forms.justice.govt.nz/search/Documents/pdf/jdo/d6/alfresco/service/api/node/content/workspace/SpacesStore/d70c78f8-c45d-4ddf-b7dc-785dc6740dc2/d70c78f8-c45d-4ddf-b7dc-785dc6740dc2.pdf>

RCAi notes the self containment standard has existed for over 25 years now, and is still failing to produce the desired outcomes. RCAi considered from day 1, that any program that places the onus on the ‘mode’ of camping has never and will never succeed. It is education which is the greatest need and you can not educate the mode.

RCAi recommends Council makes a Freedom Camping Bylaw and only make restrictions that are compliant with NZBORA, so as to prevent any possible Legal proceedings.

Site specific restrictions are to be made only in compliance with the requirements of the FCA (protect the area, health and safety of those visiting the area and access to the area where deemed as the most appropriate way to address the perceived problem and be compliant with the bill of rights. -Section 11(2) FCA abbreviated).

That Council consider other methods to ensure Campers are aware of their responsibilities and the expectations on them while Camping such as our “Accredited Responsible Campers Program” (In an ideal situation this would become a Nationwide requirement).

Yours Sincerely

Responsible Campers Association Inc

Executive Committee

Submission to: QLDC Draft Freedom Camping bylaw 2019

Contact Address: Alison and Neal Brown
83 Timaru Creek Road
RD2, Wanaka 9382
brown.hawea@actrix.co.nz

We wish to speak to our submission.

Our submission:

In any discussion about freedom camping responsibility for the environment comes first and the right to use it second; the rights of an individual to camp should not override a community's collective wellbeing. Kaitiakitanga or guardianship must always be in play.

As permanent residents of John Creek we are very aware of the numbers and range of vehicles that travel up Timaru Creek Road on the east side of Lake Hawea. This submission focuses on the east side of the lake.

What is working

- The 2012 bylaw banning of all camping along the southern foreshore and the appointment of a local warden reduced attempts to camp at John Creek. The new large signs provided in 2018 and placed at the top of Denniston Road and on the name board for the John Creek reserve have eliminated almost all attempts to camp.

What is not working and why the Draft bylaw will provide little relief

- The East side of Lake Hawea has the same dumping of human waste problems as the West side.
- There are no toilets on this side.
- The lake edge is LINZ controlled land. – not mentioned in the 2011 Freedom Camping Act.
- Some of the lake edge is accessed through pockets of DoC land, another difficulty.
- The QLDC zone sign beyond John Creek Reserve says Responsible Camping but the draft bylaw does not mention 'responsible camping' in either part 1 section 4 or in Part 2.
- The Responsible camping sign is either misunderstood or being ignored given the amount of human waste at places such as Willow Bay/Camp Bay.
- The draft bylaw does not address enforcement other than in Part 3 Discretionary consent.

What we recommend for the East side

- Prohibit camping along Timaru Creek Road, a QLDC road. This may deter some non self-contained vehicles.
- Negotiate with DoC to block off access through their land at Willow Bay.
- Enforce compliance.
- Ensure the wording in the new bylaw is clear about intentions, definitions, and restrictions and that wording matches corresponding signs and maps.

Other recommendations

- Lobby Government to repeal the existing 2011 Freedom Camping Act. Currently it does not meet the needs of this district with the very high numbers of visitors and large areas of land not under Council control.
- Charge campers a fee for services provided. New Zealand is not a country where people may camp anywhere they like and for free.
- Ensure that our environment is respected and cared for.

SUBMISSION on Draft Freedom Camping Bylaw 2019

TO: QUEENSTOWN LAKES DISTRICT COUNCIL

Email: services@qldc.govt.nz

NAME:

**Sarah & Richard Burdon Burdon
Glen Dene Ltd & Glen Dene Holdings
Private Bag 9001
Wanaka
Tel: 0272260283
Email: sarah.burdon@xtra.co.nz**

We support the Draft Freedom Camping Bylaw 2019 in part as being the best option going forward at this time but we oppose freedom camping and some of the provisions in the Bylaw and believe that the areas of prohibited freedom camping areas should be extended. We have offered directions as the best ways for QLDC to improve on this bylaw.

Introduction:

Sarah and Richard Burdon reside at Glen Dene Station on the eastern side of Lake Hawea. They have been farming in the area for 3 generations and have diversified into tourism running their own hunting and fishing business as well as owning The Camp at Lake Hawea. Both Sarah and Richard are passionate about the land and the area and Sarah also has an Ecotourism Degree. Sarah and Richard put in a submission in 2011 for the 2011 by law which was heavily focussed on the environmental effects of freedom camping (attached). Since then they have been active participants in the Freedom Camping discussions especially due to the continuous mess that has occurred at the Craigburn as a consequence of freedom campers. Please also find attached a number of photos Sarah took at that area providing evidence of waste left by freedom campers. It is a known fact that the amount of people in self-contained vans do not use their facilities and although not everyone is at fault Freedom Camping is no longer sustainable in this region. Sarah and Richard believe that after running a holiday park in the area on the lake that holiday parks going forward are the sustainable option. This provides a user pays system rather than the Council using taxpayers and rate payers money to support freedom campers when they come to the area providing areas to camp and facilities. The user pays system the money is injected back into the community and providing employment in the area. It relieves the pressure on services within towns as the Holiday Parks have facilities for guests to use, removal of rubbish and provide a service to promote the region. With increased use of the Campgrounds and Holiday Parks more services and facilities can be put into these camps. Eg Albert town. With more use then new and improved facilities can be afforded.

We have read the QLDC statement of proposal regarding the proposed Freedom camping bylaw 2019. This document along with the Responsible Camping Strategy 2018 (referring mainly to Roamers) has provided enough information for us to come to the conclusion that Freedom is no longer sustainable in the Queenstown Lakes Region. With the increase in tourist

numbers, increase in residents and the popularity of the area the problems outlined in the Responsible Camping Strategy it made it very clear that the negative effects from Freedom Camping were not just environmental but social and economic as well. Socially locals' experiences were affected in townships and the surrounding regions, the cost to the council supporting the freedom campers has made freedom camping a cost to ratepayers and taxpayers.

Decision we want council to make:

We however, support the proposed Freedom camping bylaw 2019 in part as it extends the prohibited freedom camping areas however we believe that this is not sufficient and that there should be a **Total Ban** on freedom camping. If this is not permissible, then the Proposed Prohibited areas should be extended further. People come to visit and live in the region predominantly due to the outstanding natural landscapes making up our region and our region needs to be protected from irresponsible freedom campers which are prevalent. The QLDC area is supported by sufficient camping grounds and holiday parks where campers visiting the area should be required to stay, efficiently adopting a user pays system. I repeat utilising Holiday Parks and campgrounds ensures sustainability with user pays and the money is not only reinvested in the communities, but it removes many of the social and environmental problems associated with freedom camping eg. Disposing of rubbish and waste, increase hygiene, people not using public facilities in towns to wash, reduction of crowding on popular lakefront areas etc.

If a total ban of freedom camping is not permissible then we therefore propose that in addition to the Proposed Prohibited Area all freedom camping should be **prohibited within 30 km of a township, campground/holiday park** unless they have a council permit. This would ensure that a large percentage of concern in the QLDC region would be protected from irresponsible freedom campers. This also includes backroads around farming areas where people often deposit waste and park in gateways. In getting a council permit they should have to pay, be educated on responsible camping and have to register themselves and their vehicle through an app so that they can be tracked (similar to campermate). This would ensure that the wardens are aware of their presence and can police the campers efficiently. Without the permit then camping should be prohibited. We believe that this will not deter people but add value to their experience in visiting a protected and well looked after area rather than a scummy area with waste deposits and litter paper everywhere.

I also propose that changes are made to the Draft Freedom camping Bylaw 2019 as follows:

Draft Freedom Camping By law 2019

	Part 1 Preliminary
3.1 c	The purpose of this bylaw:
	Include:
	<ul style="list-style-type: none"> Recognise that freedom camping is no longer sustainable in the QLDC region Control freedom camping
3.2	The bylaw achieves this purpose by:

	Include:
	<ul style="list-style-type: none"> • Banning irresponsible freedom camping
	<ul style="list-style-type: none"> • Encouraging responsible freedom camping through permit system
4.1	<p>Self-contained vehicle NZS5465:2001</p> <p>There was an amendment made to this certificate so this should include amendment 2: The reason being as this is what causes so much confusion as to what is self-contained and what is not. 6.1.1 would rule out many of the irresponsible camper vehicles that are traveling around as they would not comply. This would rule out many of the Roamers identified in the Responsible Camping Strategy 2018.</p> <p>NZS 5465:2001</p> <p>SELF CONTAINMENT OF MOTOR CARAVANS AND CARA</p> <p>AMENDMENT No. 2</p> <p>31 May 2017</p> <hr/> <p>6.1 Minimum requirements (page 10)</p> <p>Delete clause and substitute:</p> <p>6.1 Minimum requirements</p> <p>6.1.1</p> <p>The motor caravan or caravan shall be equipped with a toilet that is adequately restrained or secured when travelling. The toilet shall be usable within the vehicle, including sufficient head and elbow room whenever required, even with the bed made up.</p> <p>Where permanent toilets are installed, this shall be in accordance with the manufacturer's instructions and comply with the sanitary requirements in section 3.</p> <p>6.1.2</p> <p>When the conditions of 6.1.1 are met, a portable toilet may be used externally (e.g. within a toilet tent or awning, where it is appropriate and convenient to do so).</p> <p>(Amendment No. 2, May 2017)</p> <p>.....</p>
	Part 2 - Restrictions on Freedom camping
	Refer to Schedule A - this is a blank document so have referred to the maps on the QLDC website.
	Maps do not cover from The Neck to Makarora. Makarora is not shown.
5.1	Change the wording to read:

	No person may freedom camp within 30km of a township, camping ground or holiday park
6.0	Remove totally
7.1	Freedom camping permitted if they have a QLDC Permit <ul style="list-style-type: none"> • QLDC Permit – • Educated on freedom camping and rules, inspect vehicle to make sure complies including ammendment 2 • Register with Council as well as vehicle • Download applicable Ap so can track and trace freedom camper
	Schedule A
	Please produce a map showing areas within 30km of Township/Camping Ground/holiday park a prohibited area for freedom camping. If not permissible can you please extend the prohibited freedom camping area for Lake Hawea Township to Makarora and also from John Creek to the Dingleburn Station. All backroads in the Hawea township/Hawea Flat area should also be prohibited from freedom camping.

Conclusion

It is evident that the draft By-law will not solve the problems that Freedom camping is causing but it will alleviate some of areas of concern. We hope that council take on the above suggestions to further improve the Freedom camping problem in the area.

We congratulate the council on their proactive approach to this issue but we also encourage the QLDC Council to be strong and protect our future and ensure that our region remains clean and is protected from irresponsible campers so that future generations can enjoy what we have to offer and visitors continue to visit.

Regards

Sarah & Richard Burdon

Enc.

Freedom Camping Submission 2012

Verbal follow up at hearing

Photos of Craighburn area taken 02/04/2018

Rural talk given to Council



SUBMISSION

To: QLDC

Submission on the: Freedom Camping Control Bylaw 2012

Date: 12/04/2012

Contacts: Sarah & Richard Burdon

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stay@haweaholidapark.co.nz

We all wish to be heard in support of our submission

Introduction:

Richard and Sarah Burdon farm at Glen Dene Station from Lake Hawea township to the Neck. The property includes land on both sides of the State Highway 6. Richard and Sarah also own the Lake Hawea Holiday Park at the Southern end of Lake Hawea.

Richard is a proactive member of the community. He was chairman of Otago Federated Farmers and is often a spokesman in the local and national papers for the area. Sarah and Richard see the future of Glen Dene is about the management of the land. Richard and Sarah were the Supreme winners of the 2008 Otago Balance Farm Environment Awards which shows their commitment to all aspects of their business.

Sarah has an Ecotourism degree from Flinders University in Australia. She values the environment and spoke with the previous council regarding the farmers concerns on Freedom camping and she believes that there is not enough emphasis being placed on the damage it is causing to the actual environment.

Mike King is the Manager at the Lake Hawea Holiday Park and has previously managed stations locally. He is also a strong advocate for the protection of the environment.

It is important to Richard, Sarah & Mike to ensure that the environment is protected.

We would all like the opportunity to speak to the council about our submission.

We are opposed to the current bylaw.

We have attached our previous submission (attachment A) as this is still relevant and we still advocate that the bylaw should include the suggestions outlined in that submission. We would therefore like this to be included as part of this submission.

In addition to our previous submission we disagree with the freedom camping zones outlined on the current maps provided by council - ref schedule A.

We think that the maps show that the QLDC is completely missing the point as to why we need a bylaw in the first place. The Lake Hawea community has been working really hard to protect its foreshore of further degradation caused by freedom campers and day visitors. It has been publicised in the news, on TV and is a regular topic on their agenda to stop rubbish and human waste being dumped on the foreshore. The maps from the previous bylaw should be reinstated and signage and freedom camping zones must remain. Without these zones and signage the council is encouraging people to pollute areas. Due to the vastness of the area the council cannot manage the area without the zones. This has been proven in the past when the Lake Hawea Community

has had to take it into their own hands and clean up the mess with their bare hands.

So why has Lake Hawea foreshore (located on State highway 6 Lake Hawea/Makarora Road) been taken off the maps We understand that you are not able to fine in these areas at present but that should not mean that these areas should be excluded. These are the very areas which the bylaw is supposed to protect. If the by law cannot include areas such as previous sort then the bylaw is bit fit for the purpose intended.

When you look at the problem, which is: human waste deposits and litter are been left behind in these areas. It would seem obvious that you would aim to stop people camping in those areas. So it would actually be better to have people camping in their vans in the township where there are toilet facilities rather than on the shores of Lake Hawea so that these areas can be protected and remain pristine.

In the past no camping in the townships has pushed people out of the town areas and into the semi-rural areas where people have slept on country roads and have deposited rubbish and human waste. It must be reminded that it is well know that many of those that hire vans with facilities do not use the toilet on board. Only small percentages (~20%) use their facilities. As camp owners/manager's we note also that only a minimal number of people are using our dump station facility and this is included in camp price. Being rural we are familiar with dumps found at gates, near yards and farm buildings. There must be suitable enforcement to ensure that these areas are protected from people camping without facilities. Those who cannot afford the holiday park fees will revert to camping out of the town. This could escalate the problem in the more remote areas which are the areas that need to be protected. Areas that are not close to town are difficult for council to manage and rely on support from the rural community to clean up the mess. This illustrates the desperate need to have areas such as Lake Hawea foreshore (state Highway 6) to be included in the Zones.

The reserve area next to the Lake Hawea Camping ground has also been removed from the No Freedom Camping Zone. The Lake Hawea Holiday Park is a council owned camping ground and we as lessees are not impressed that people are able to camp so close to the camping ground. We feel that support from council should be unanimous and this area should be included in the No Freedom Camping Zone. Staying in the holiday park we provide a dump facility, recycling and rubbish bins for campers rubbish. It is noted that many bins that were provided by council have since been removed (eg at the Lookout at Lake Hawea). The amount of rubbish we remove from the camp has increased over the years which show that people are using camping grounds also for the purpose to get rid of their rubbish. This is an added cost to us and reduced cost to the council. However, it is better for their rubbish to end up at the Holiday Park rather than being left in the environment. We think that it is therefore important that the bylaw and QLDC encourages people to use Holiday Parks and camping grounds rather than being able to freedom camp straight outside of them. All this does is send mixed messages.

Please fight for the cause and not just taking the easy way out. We need the bylaw to protect the areas that need protecting. We are happy to work with council on the by-law so please do not hesitate to contact us if you would like any help.

Regards

Sarah, Richard & Mike

Attachment A

SUBMISSION



To: QLDC

Submission on the: Queenstown Lakes District Council Freedom Camping
Control Bylaw 2011

Date: 01 April 2011

Contacts: Sarah & Richard Burdon

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027 226 0283 Sarah

Introduction:

Richard and Sarah Burdon farm at Glen Dene Station from Lake Hawea township to the Neck. The property includes land on both sides of the State Highway 6. Richard and Sarah also own the Lake Hawea Holiday Park at the Southern end of Lake Hawea.

Richard is a proactive member of the community. He was chairman of Otago Federated Farmers and is often a spokesman in the local and national papers for the area. Sarah and Richard see the future of Glen Dene is about the management of the land. Richard and Sarah were the Supreme winners of the 2008 Otago Balance Farm Environment Awards which shows their commitment to all aspects of their business.

Sarah has an Ecotourism degree from Flinders University in Australia. She values the environment and spoke with the previous council regarding the farmers concerns on Freedom camping and she believes that there is not enough emphasis being placed on the damage it is causing to the actual environment.

It is important to Richard and Sarah to ensure that the environment is protected.

We would like the opportunity to speak to the council about our submission.

Firstly we would like to commend the council for forming the Bylaw as it is not easy with it not being a unanimous law nationally.

Secondly, if people had not been irresponsible with their litter and waste this would not have been necessary. The bylaw is being put in place to stop irresponsible dumping of waste and rubbish in our environment. This should be noted in the summary and the bylaw purpose so that is clear what the bylaw is trying to achieve. This is the reason for the bylaw and for the bylaw to be successful then this must be adhered to and must always be the main consideration for any decision.

Thirdly there are a number of issues of concern and although I support the bylaw, until there is more information provided regarding the enforcement of the bylaw I am reluctant that it will work. I have outlined a number of issues I believe need addressing. With regard to the QLDC summary of statement of proposal under:

Key Features of Proposal, a):

- a) I note that the freedom camping zones will extend approximately 2.5km from any residential zone land and that freedom camping will be prohibited within and within close proximity to all townships and residential areas in the Queenstown Lakes District

In the past this has pushed people out of the town areas and into the semi-rural areas where people have slept on country roads and have deposited rubbish and human waste. There must be suitable enforcement to ensure that these areas are protected from people camping without facilities. Those who can not afford the holiday park fees will revert to camping out of the town. This is likely to be those with the more budget vans which do not have facilities and this could escalate the problem if the more remote areas are not patrolled. It is therefore essential that wardens are plentiful. The further out of town, the harder it is to police, especially in the later part of the nights and early mornings. A strategy must be put in place to deal with the enforcement of bylaw.

Queenstown Lakes District Council freedom Camping Control Bylaw 2011:

4. Purpose

To include

(a) to stop the irresponsible dumping of human waste and rubbish in our environment

This is the main reason for the bylaw and should be included as point (a)

6. Permitted Freedom camping in other areas

1. *A person may freedom camp anywhere in the District outside of any no freedom camping zone as identified in the schedule to these bylaws if that person....*

This needs to be clarified further to remove anywhere and be replaced by **"public lands"** otherwise people will think that they can camp anywhere where it is not red. We do not want an increase of people abusing land rights and rubbishing and parking up on private lands.

Schedule A – No Freedom Camping Areas

I **oppose** the no freedom camping area map as I believe it needs to include a number of areas. Firstly it must be reminded that the reason we need this bylaw is because people have been irresponsible with the disposal of human waste and rubbish.

Therefore, the reason for this bylaw to be enforced is to stop people from disposing of rubbish and human waste. This, therefore, should always be taken into consideration when putting areas on a map.

There should be a certain criteria for the "No freedom camping zones" to be included on the map and if there is one already then it should have been included in the proposed summary.

Areas which should be included on the map

- a) Those areas which are hard to patrol or monitor should be included on the map. The areas which are not policed by the Bylaw must also be included in the areas as, without patrolling these areas the bylaw is not enforceable and the problem of littering continues to occur and increase.
- b) Those areas where problems are occurring **now** should also be included on the map as per the QLDC summary of statement .
"These include: Those areas which are polluting waterways, beaches, roadsides, parks and gardens and other public places with human waste and rubbish" should be included on the map.

An *example* is the area at Lake Hawea. The waste and rubbish doesn't just stop at the Craighburn.

I believe that this map needs to be reassessed and reasons why the areas have been allotted should be included or attached so that people understand why the areas have been included.

I really only have the experience in my immediate area so please find below the areas I believe need to be included:

Areas to be added to the No Freedom Camping Zones Map

The following areas should be included on the No Freedom Camping Zones map:

The zone should include state Highway 6 from **Makarora to the Lake Hawea Township**

Reasons:

- a) This area has been noted as an area where human waste and rubbish has been deposited consistently.
- b) There are a number of campsites including 2 Doc sites - Boundary Creek, Kidds Bush as well as the Lake Hawea Holiday Park to accommodate campers
- c) The area is hard to patrol as it is a fair distance from town centres making it difficult to catch or stop people camping if they arrived late at night and left early in the morning.
- d) It makes the wardens job easy as there would be no arguments imposed as to why you could camp at one part of the lake but not the other.
- e) As well as campsite there are also plenty of loo facilities available within 30 minute drive. This is not an excessive wait if you are travelling the area.

The zone should include:

Mungawera Valley Road and Dublin Bay

Reasons:

- a) Again these are areas where I have knowledged that human waste has been dumped and rubbish left.

- b) These are areas which, unless there were wardens present, they are hard to patrol.

Other

There are also a few other issues we have with the introduction of the bylaw and we would like to know how these are to be addressed:

Private Lands

It is important to Richard and Sarah that once the bylaw is adopted that the problem doesn't move to private lands. It is also a worry to them that people are not respecting private lands and there have been a number of times where campers have used their land to camp without permission. When they have been asked to move on the people have been rude and abusive. This problem could escalate with the introduction of the bylaw eg when people are asked to move on then they may move on to private land. Is there a way of dealing with this problem under the bylaw eg. Can wardens also move people off private lands? These issues need to be addressed prior to the bylaw coming into force.

There has also been endless times when campers have blocked access gates to the farm and have entered private land and deposited rubbish and human waste at sheds, yards, gates etc. Again, instead of polluting on public lands there may be an increase of people polluting on private lands.

Past Problems – Litter Act enforcement not successful.

As you would have been fully aware over the last ten years the Lake Hawea Guardians have been trying to work out a solution to the rubbish and human waste left on the lake front of Lake Hawea. It has got to the point that they blocked off access with boulders. After the most recent clean up there was a visit from the Mayor Ms Van Uden. There was fresh new evidence of human excrement, toilet paper and rubbish at the sites visited. What concerns me is that we do have a litter act which is enforced by the council, however it is administered on a complaints basis and it has proved from the amount of waste that it is not an effective way to catch littering felons. We know that campers are not the only offenders but we also know that there are ample stops along the way for people to go to the loo. We also know from the campervan company Maui that 80% of their campers with self-contained vans do not use the facilities within their vans and from the QLDC surveys that "no camping" signs do not work. The fact that people are

stopping in an extraordinary beautiful spot and rubbishing is disgraceful and unless there is a way of stopping people then the Freedom Camping Bylaw is necessary and it is also necessary to ensure that the map includes the whole length of Hawea. Clearly this area has had problems in the past which have not been able to be resolved. Therefore it is essential that it be included on the map.

Administering and Enforcement of the Bylaw

It is all very well to have a bylaw but there is not information on how this is to be administered. As with the Litter Act, it is a perfectly good Act but it depends on the way it is administered. There seems to be a number of issues which need to be made public before the bylaw is passed and that is detail on how the bylaw is going to be enforced.

Issues include:

- a) The bylaw covers vast distances and to ensure that it is enforced we would like to know how the council proposes to enforce the law.
- b) What is the cost of administering such a bylaw effectively and efficiently - is there a budget within the council to ensure that this is successful.
- c) Wardens - who can be wardens. Is this a broad range of people such as
 - a. Adjoining landowners,
 - b. volunteers
 - c. the police
 - d. QLDC workers
 - e. community members
- d) What rights do the wardens have. Can they issue infringement notices or revoke people from permitted freedom camping
- e) How are the areas going to be patrolled or monitored?
- f) Can the Bylaw be updated or altered easily to ensure that it works efficiently and effectively.
- g) Are the wardens also able to enforce the litter act?

Finally

Again, we commend the recent council for following up on the freedom camping problems. However, we urge the council to make a strong stand on this issue so that our environment is protected for all future generations and visitors to New Zealand.

We would like to see this country live up to its 100% pure image instead of 100% pure crap!

The council will come across opposing groups of campers who are not irresponsible campers - however the bylaw must be enforced otherwise the problem will continue.

Putting an information page in the AA guide and Jasons Camping guide outlining our jurisdictions of the bylaw and map of areas you can freedom camp as well as information on our Lifestyle Reserve would be a proactive way to reach a large group of campers.

It is not up to the local communities to clean up other peoples human waste. We need to protect our environment and waterways and by stopping a number of people from doing this is, is important to ensure our environment is not degraded any further.

Sarah Burdon – Verbal follow up at hearing 2011

Hello my name is Sarah Burdon. Thank you for the opportunity to speak on this issue.

I take it that you have read my submission so I am not going to read it out but outline a few points.

It is very easy to see that we are not going to resolve the problem unless we stop the problem. I therefore know that you will be put under a lot of pressure by responsible campers, however it brings me back to my main point – the reason that we have to address this issue – the primary reason is that we have a huge problem of rubbish and human waste being deposited around our district.

This is not just onto the foreshore but also on private lands where people are also depositing human waste especially around sheds and gateways.

This is the problem – our environment is being affected. We have grown as a community over the years and so have the number of tourists coming through and this is more the reason to protect our environment for future generations. I feel for the responsible campers but I think everyone understands that the environment must come first.

Therefore it is essential that it must be included in the purpose of the bylaw that

- a) Our primary reason is to stop the irresponsible dumping of human waste and rubbish in our environment

So the understanding is not to stop camping but to stop degradation of our environment and protect our environment.

This bylaw also needs to protect the owners of private lands as there are so many times when people are found camping on private land too and are hard to move on.

We all know that it is essential to keep our country clean and tidy. We know that there are limited funds in our community and therefore it is essential that the user pays so that we can get more facilities, that we can enforce the bylaw.

We know that no camping signs don't work in fact encourage people to camp.

We know that 80% of Maui Van owners do not use their facilities so we can't agree that if you have facilities on board then you not going to rubbish or dispose of human waste. Even if facilities are provided people still don't camp near them.

We have over 40 camping places with toilet facilities. Some of them are holiday parks at \$35 a night for power and then the doc camps charge \$6. This charge covers management, facilities, power, removal of waste, rubbish – the user pays. It is expensive to remove rubbish and waste and keep places clean and tidy. We all know that.

So if people do not use the appropriate facilities, then we have a problem and that is exactly what we have.

A problem of human waste, rubbish and a degradation of our environment. Who wants that??? Because that is what we have got and it only keeps mounding up, affecting waterways, beaches, roadsides, parks and gardens and other public places. Is that okay. No it is not. Other countries don't allow it either so why should ours.

Since my submission I believe that camping should only be in designated areas which have toilet facilities available. This is similar to the West Coast. Reasons being that if they are moved from one area they go to another area which increases the area of pollution as a whole and makes it incredibly hard to police. It is always a number of people that ruin it for others. However, protecting the environment is the most important issue in this case and to resolve the problem is to solve the problem and that is to remove the problem. Freedom Camping. I feel that the council still has a lot of work to do to ensure that the bylaw is enforced effectively and efficiently but I commend you so far and look forward to seeing it in operation and look forward to a commitment to keep our district 100% pure.

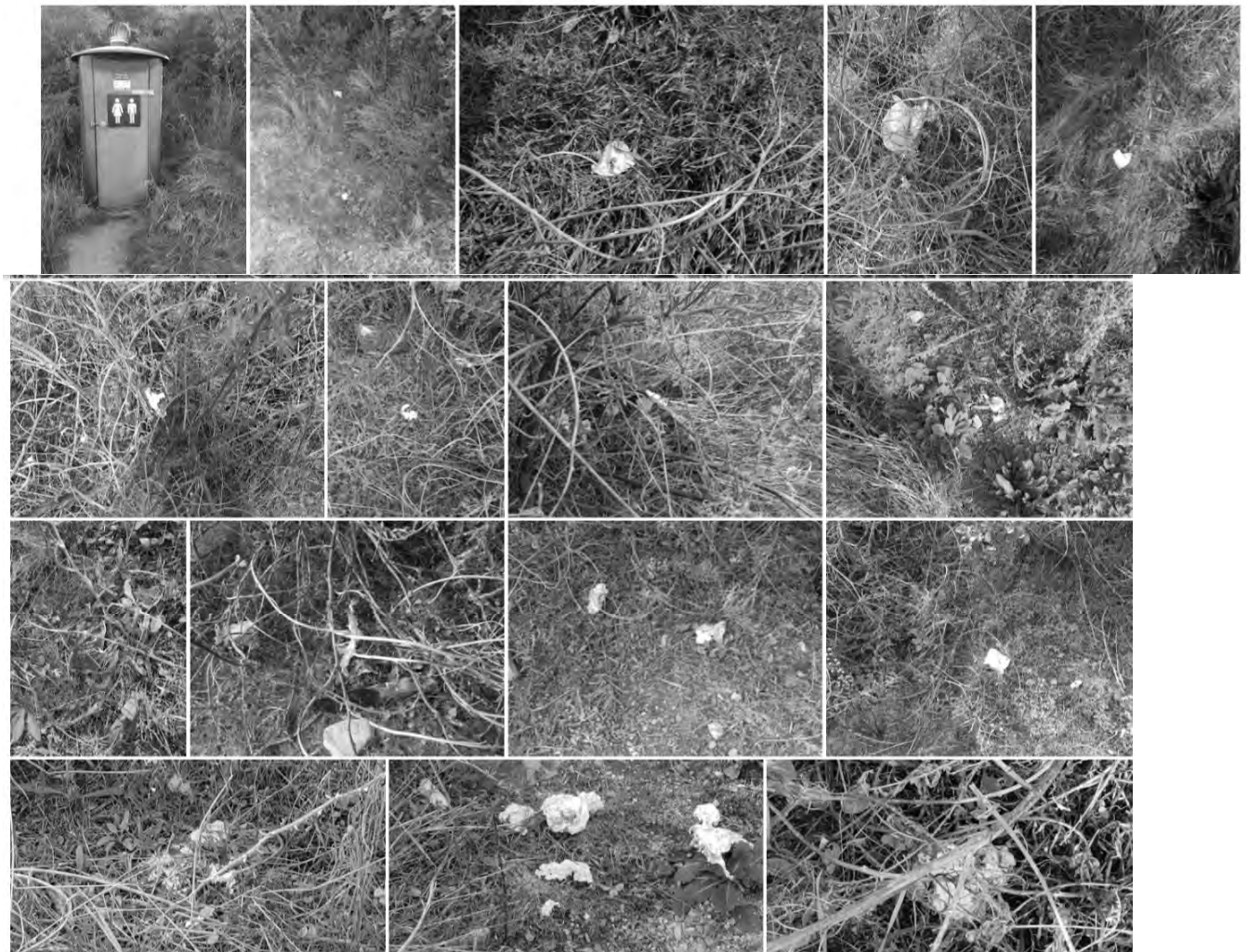
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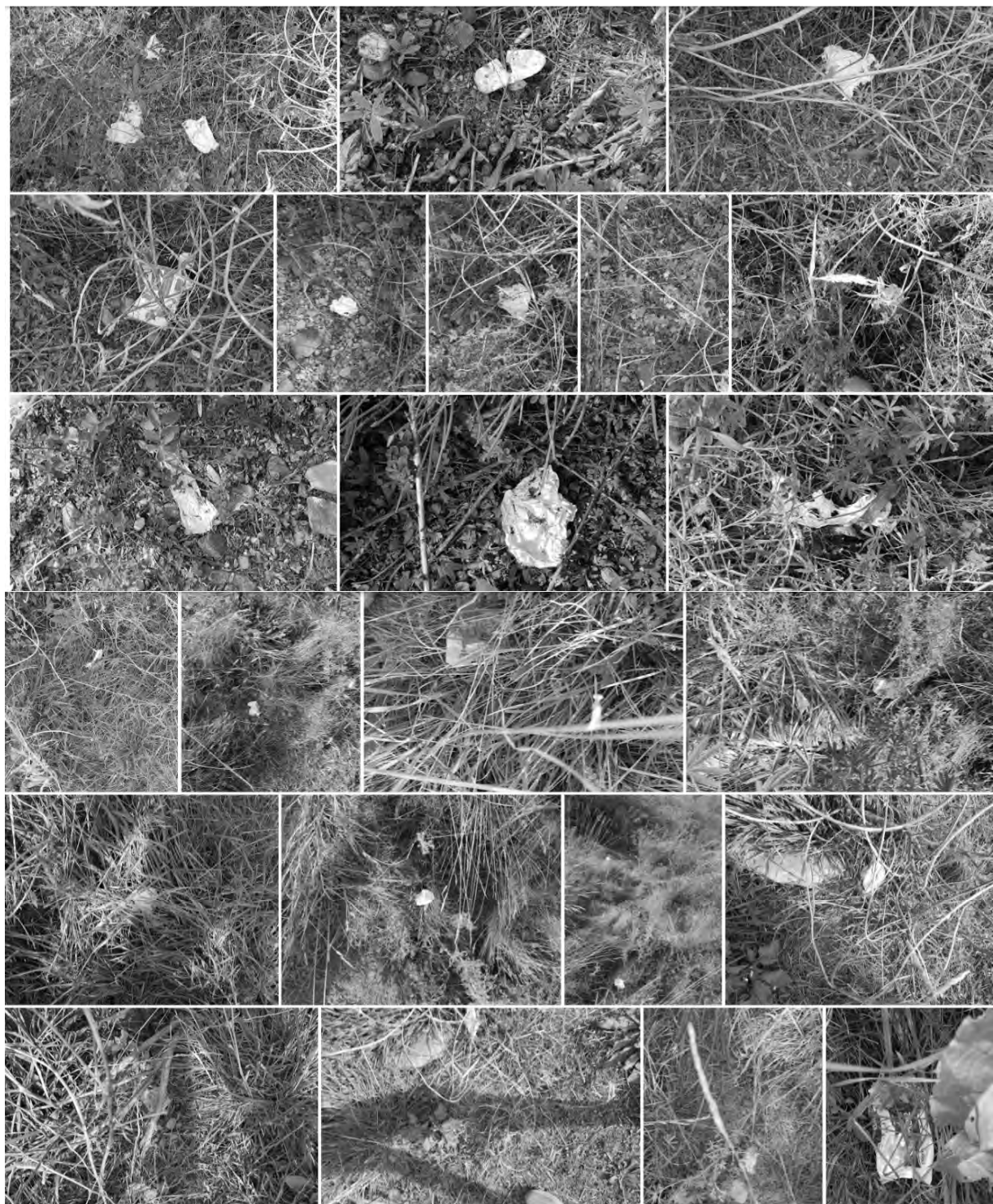
The Craighburn 02/04/2018

7 Apr 2018

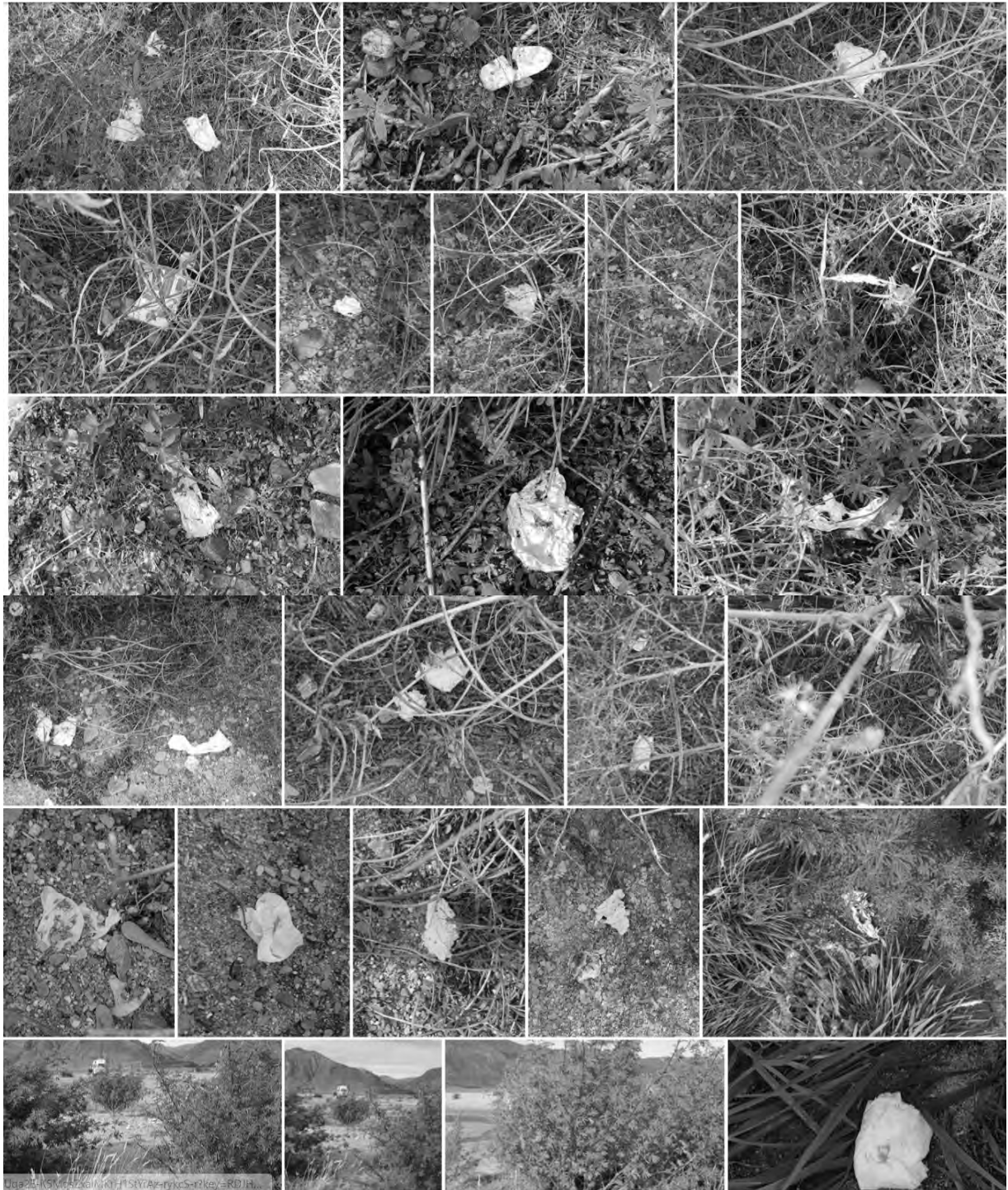
S G B P R E A J ... +

Craighburn, Lake Hawea. Loo on site. Over 160 photos showing litter, predominantly loo paper littered all over the place (tampons & pads included). Our visitors are not respecting our environment! The problem is not going away. Do we want the mess to keep building up? We are expecting tourist numbers to increase further in the next couple of years. We have been talking about the problem for decades but the problem is getting worse. Where is the strategy to make sure that our environment is looked after for future generations. FACT - Campers are not using their on board facilities or the loo facilities provided at sites. To reduce the problem overnight camping must stop immediately and a strategy must be put into place. Areas must be controlled, facilities paid for and limits on numbers in areas. Are we too scared to put the environment first? The mess below speaks for itself. Don't keep letting the mess build up, stop the mess by stopping the camping. Find a solution, put a strategy in place and go from there.

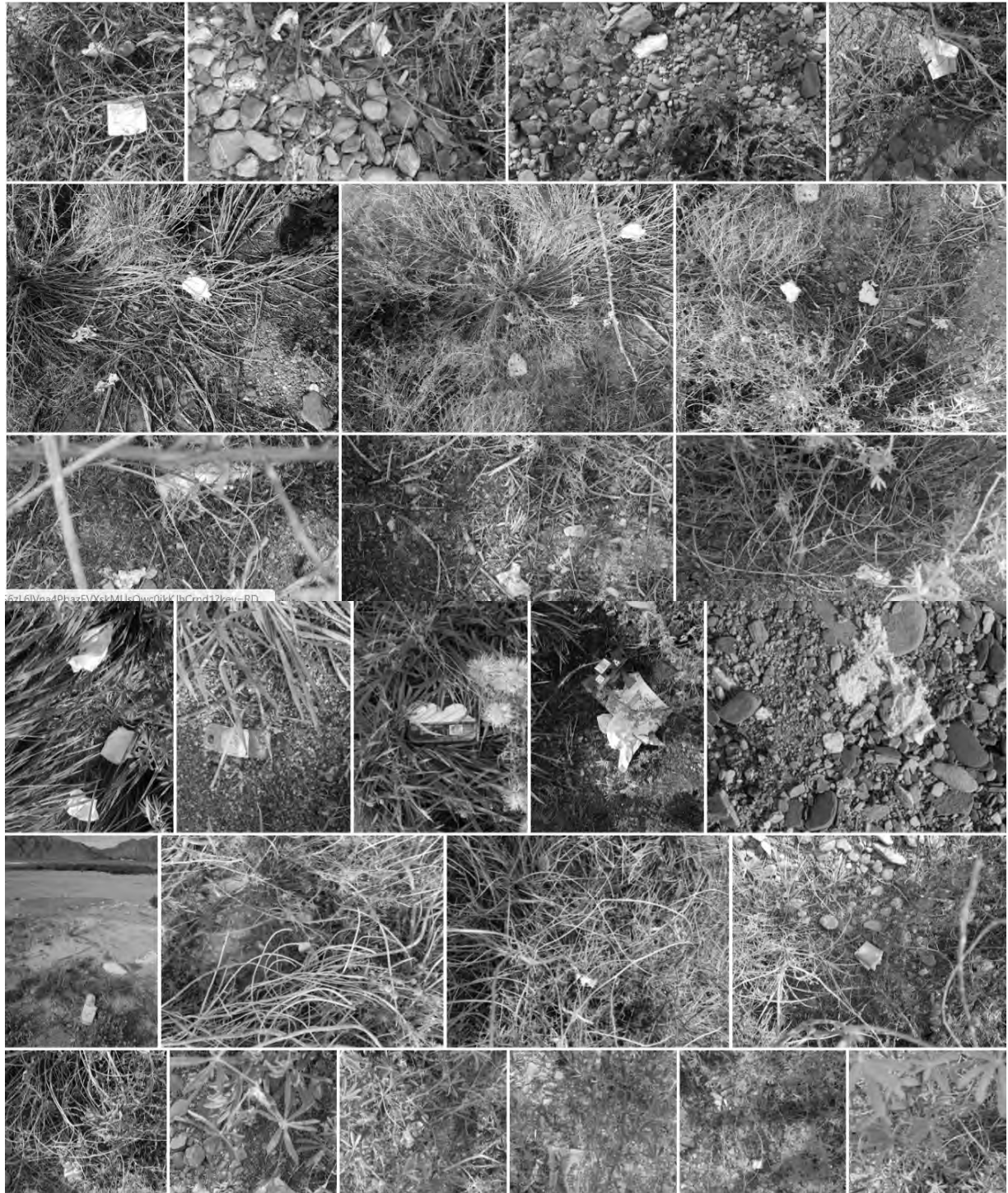


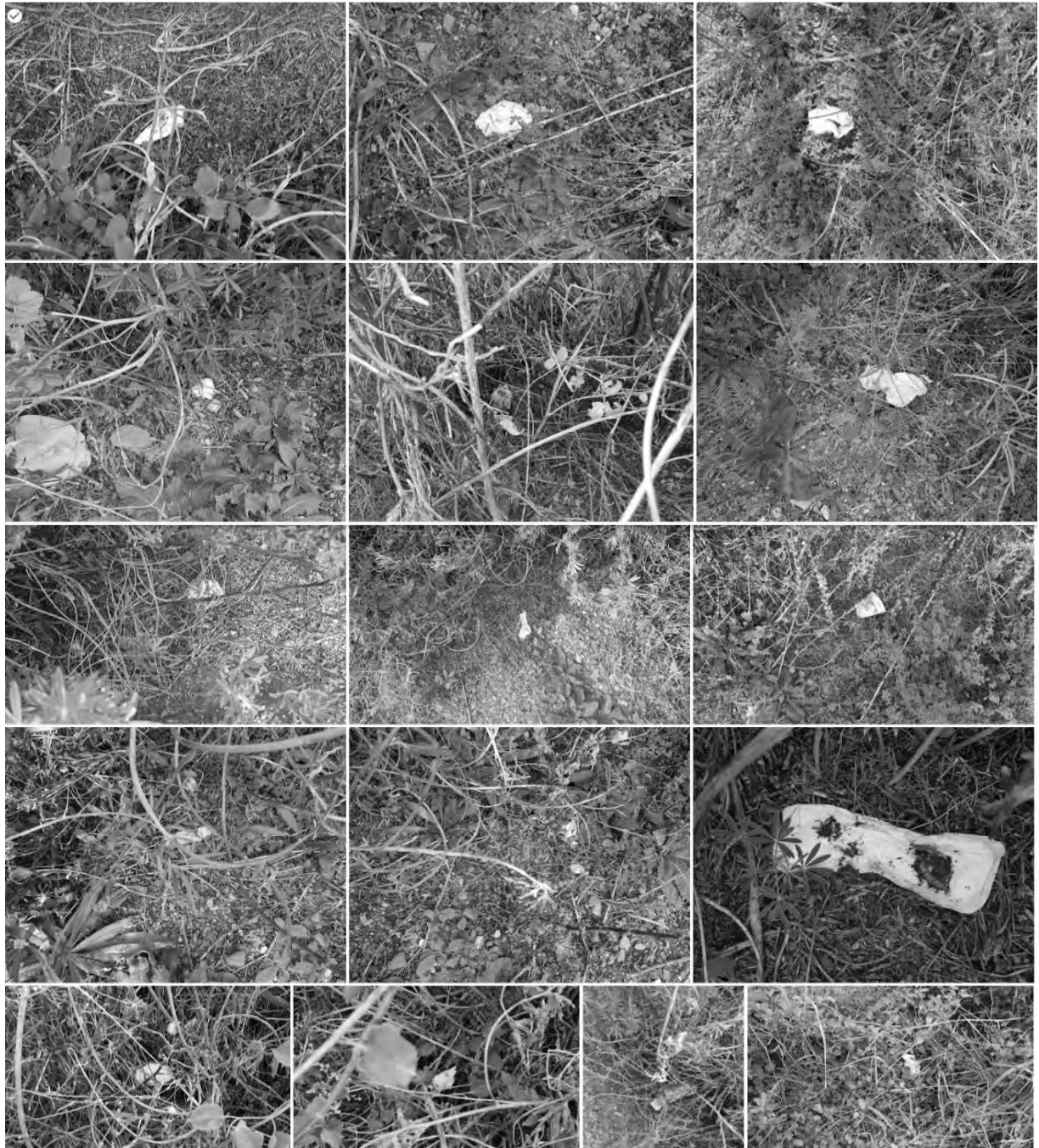


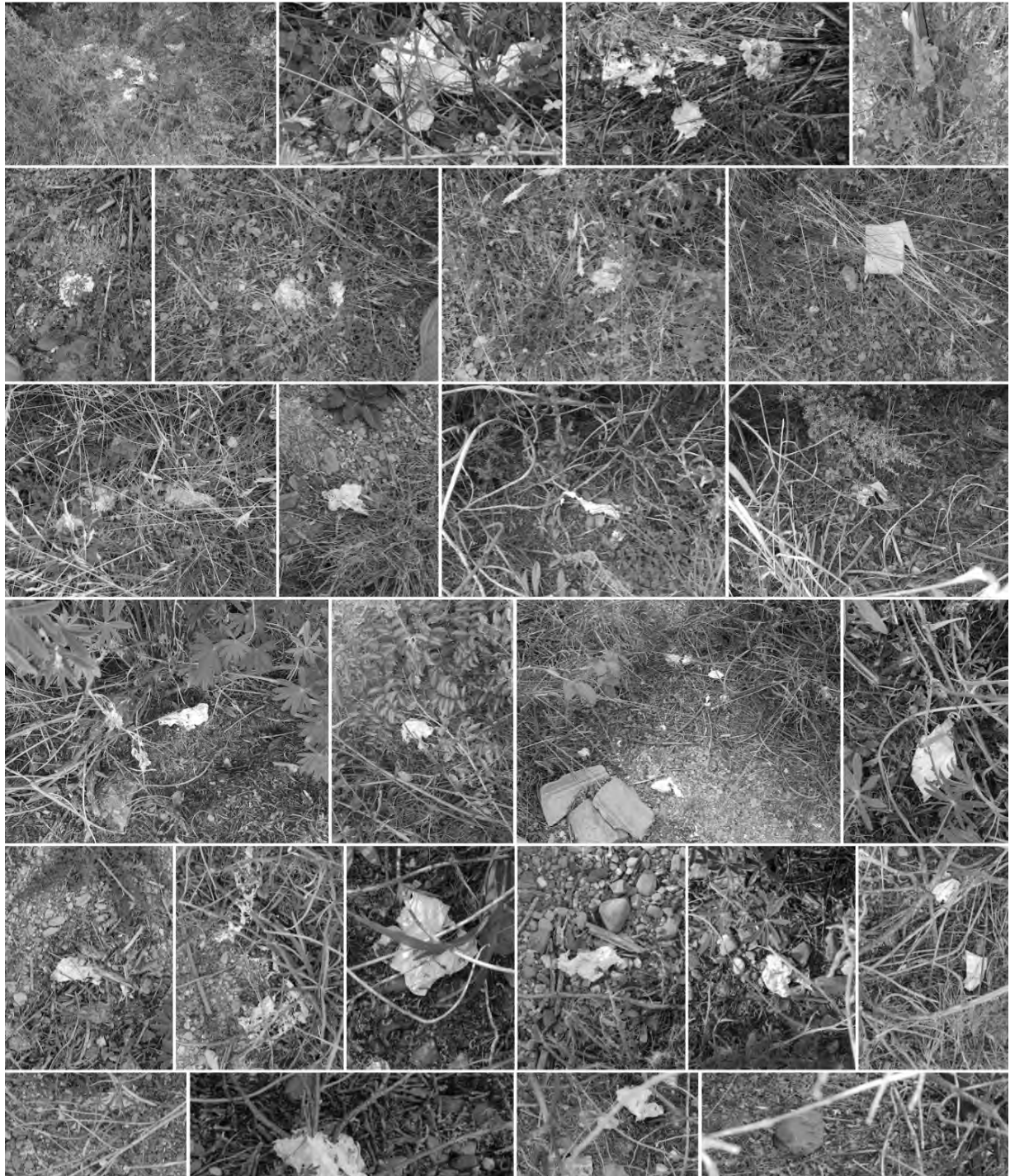














Sarah Burdon – Talk Freedom campers 2010 to Council Members.

We all know where they go and where they don't go. We all know about the problems associated with freedom campers because we see them all the time.

All the farmers here would have stories to tell off human waste deposited near their yards. Dogs rolling in them. Us standing in them. Vans parked at your gates when you are trying to get a mob of sheep to move in. We could be here for hours discussing each others stories which most are revolting.

Lets have a look at the rural community and freedom camping. We have our farms, lots of legislations which we have to follow in order to operate and we seem to get more and more bureaucracy pushed at us every day which affects us getting on with our job of farming.

Freedom camping is another issue that all of us face on our farms – not only with rubbish and human waste disposal but also with entering private property, preventing access (parking at gates).

The council legislation is that you can freedom camp if your van is fully self contained (with toilet wastewater and rubbish facilities on board), then unless signposted otherwise you may camp overnight for free on public land.

In return they must be away from the town centers and residential areas within the district.

With out facilities you cannot freedom camp but need to stay in a camping ground. We have lots of camp grounds in the area and they all provide toilet facilities– boundary creek, kids bush, Lake Hawea Holiday park, Glendhu Bay, The Outlet, Top Ten, Aspiring Motorpark. Albert Town. At least 9 choices for people to make as well as the all the township facilities providing extra loo facilities and rubbish disposal.

Most of the camping grounds (apart from Doc) provide a rubbish facility for getting rid of all their rubbish dump stations, toilet facilities and showers. There is no excuse not to use a toilet when staying overnight in the area. – There are adequate facilities in the area.

So once the campers are kicked off the lakefront at 5.00am in the morning do you think they are going to wander into a campground and pay to stay. No they find some quiet back road. We have all seen them. It was also said

that about 80% of people that use the larger vans with facilities hardly use their facilities as they don't want to dirty their toilet/shower in the van.

It is noted that 50-100 campervans are camping in rural areas per night without facilities and double that parking in township streets etc in Queenstown and Wanaka. Equating to 150,000 bednights per year. What is the cost of that waste on our environment???? Our beautiful pristine environment – Its Huge.

Everyone also would know that the Lake Hawea community has blocked off entrances to stop people parking up and polluting the water and shores. That hasn't stop people going to another entrance, people are still freedom camping and polluting our environment.

The council advised they were going to put up some signs. Great idea until you look back and in QLDC's draft freedom camping strategy revealed a "no camping" sign did not work. In a test at the lakefront One Mile Powerhouse car park from January 27 to March 23 2009.

"321 vehicles stayed at the 40-space car park in the the four weeks no sign was displayed, 341 vehicles stayed in the four weeks the "no camping" sign was there."

So it brings it back to the Council. Unless there are people out there patrolling the areas and fining people this is going to continue to happen. Not just having wardens moving people on.

An example – there were 4 campervans and 1 tent parked on some gravel above the Lake Hawea Holiday Park. 200 m from the entrance. The council would have raised \$40 each, plus it would have been cheaper for the campers to go and stay in the park and it would have saved and protected our environment. .

There are enough holiday parks in the area and they need to be utilized and the freedom campers need to be stopped. This has been an ongoing problem. An ODT article from April 2009 shows the Guardians of Lake Hawea trying to get some action back in 2004 and their angst about freedom campers. I don't believe we have progressed very far. We have just accumulated and extra 6 years of poo into our environment.

The freedom camping forum held in Auckland is being proactive and are discussing the issues and have been to the campervan rental companies to push the message across that it is unacceptable to camp at undesignated spots.

That takes ages for that information to seep down through the system, through to Queenstown Lakes.

The council has spent so much money in this district on landscape protection, environmental court hearings, plan 28, vegetation protection which all has a huge effect on our property rights and has had huge costs to us but they are not prepared to protect our actual environment by actually getting out there and enforcing fines, and stopping freedom campers. We might have the most beautiful landscape but the actual environment is just as important so we would like to see this problem resolved for the benefits of our community and visitors to the area.

This was presented to The CEO of the QLDC, Debra Lawson, The Mayor, Clive Geddes, Deputy Mayor, John Wilson and representatives from council, Lee Overton and planners.

GUARDIANS OF LAKE HAWEA

Submission: QLDC: Draft Freedom Camping Bylaw 2019

Contact Address: Secretary
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brown.hawea@actrix.co.nz

The Guardians wish to speak to their submission.

This submission relates to Lake Hawea and environs, but many remarks are relevant to the whole Queenstown Lakes District.

Introduction

The Guardians of Lake Hawea are a sub-committee of the Hawea Community Association Inc. The Guardians of Lake Hawea aim to ensure that Lake Hawea, its surrounds, its water quality and its biodiversity and ecosystems are maintained, and managed sustainably and safely for the benefit of all.

Since February 2004 when the Guardians of Lake Hawea submitted their document “Biosecurity of our Waterways” to a wide variety of groups nation-wide, as a response to the increasing dumping of human waste around the shores of Lake Hawea, the Guardians have been submitting and commenting on this issue.

The proposed review of the QLDC’s Freedom Camping bylaw will provide little relief for much of Lake Hawea and its environs. The Guardians acknowledge that the problem is the National Freedom Camping legislation; land controlled by Land Information New Zealand is not mentioned. Apart from freehold and leased farmland, the surrounds of Lake Hawea are almost entirely LINZ and DoC land. The exposed lakebed, at low lake levels, is also administered by LINZ.

This submission has four parts:

- I. Past and present problems with freedom camping around the lake
- II. Problems with the draft bylaw
- III. What we support
- IV. Where the Guardians request that provisions should be extended to and final recommendation

I. Past and present problems

- The QLDC’s Freedom Camping Bylaw 2012 banned all camping on the Southern foreshore of Lake Hawea and subsequently appointed local wardens who have monitored, educated and fined all campers who infringed. Locals and visitors are able to enjoy a clean and safe lakefront as a result.
- Other problem areas around Lake Hawea have included SH6, the Layby, Craigburn and Deep Bay. Since 2012 toilets have been installed at Deep Bay and Craigburn. The placement of the Deep Bay toilet has dramatically improved the area, but the sign informing travellers of the toilet has been removed. At Craigburn, unfortunately, the signage, toilet placement and amount of foliage around the toilet has only lessened the amount of human waste being dumped to some degree. Low lake levels, with water sometimes 100m from SH6, encourage camping at Craigburn, an acknowledged ‘hotspot’ where more than 30 vehicles per night have been sighted.
- The Layby on SH6 was blocked off some years ago, following unacceptable leaving of rubbish and toilet waste.
- Since 2012 problems along the Western edge of Lake Hawea have been compounded by the huge increase in numbers of travellers and campers, and the opening of the Isthmus Peak walking track. Car parking for walkers on this track is often at a premium, with vehicle numbers exceeding 70 per day at times. The spaces also encourage overnight camping despite the closeness to SH6.

- Problems are now being found on the Eastern shore of the lake. It has been discovered by freedom campers, probably through social media.
- Of particular concern is the area known as Willow Bay or Camp Bay. The amount of human waste on the lake's edge demonstrates that many of the vehicles are not self-contained or that the 'toilet' in their supposedly self-contained vehicle is not being used. Willow Bay/Camp Bay is a favourite site for locals' recreational activities but it is being soiled to such an extent that their experience is likely to be negative. Fire bans are unknown to campers or ignored. Health and safety are both at risk on the east side of Lake Hawea.

II. Problems with the draft bylaw

1. The draft bylaw is confusing.

- Part 2 addresses restrictions on freedom camping and clauses 5.1 and 6.1 and 7.1 all refer to Schedule A but the Schedule A accompanying the bylaw is blank other than the heading. The only map entitled Schedule A seems to be the Schedule A for the 2012 Freedom Camping bylaw.
- The legend for the Hawea area in that schedule contains an error when it describes the restricted area as north west of John Creek when it should read north east. Timaru Creek Road which begins at Hawea Back Road and finishes at the entrance to Dingleburn station should be labelled on the map for Lake Hawea.
- The blank Schedule A is headed Prohibited and Restricted areas but where are the permitted areas mentioned in Clause 7.1 and again referring to Schedule A?

2. Enforcement

- The Draft bylaw contains only one reference to enforcement, i.e. in Clause 8.4 under the section on Discretionary consent.
- The Guardians assume that Council intends that all prohibited and restricted areas will be monitored and that fines will be imposed where necessary. It is recommended that the bylaw include a section on enforcement.

3. Language used in the draft

- Road signs indicating zones prohibiting and restricting camping use the words Responsible Camping but this term is absent from the Draft bylaw. Some consistency in language would seem advisable.

III. What we support

- The Guardians of Lake Hawea support the intent of the draft bylaw.
- The Guardians fully support the continuation of a complete ban on all camping along the southern foreshore of Lake Hawea and within the town boundary of Lake Hawea township.
- The Guardians support the attempt to ban camping along part of SH6 north of Lake Hawea Holiday Park, but why is the line along SH6 on the Lake Hawea Map incomplete? Why is the rest of the Lake shoreline around to Kidds Bush not included given the closeness of campsites at Boundary Creek and Kidds Bush?

IV. Requested extensions and final recommendation

The Guardians of Lake Hawea request:

1. that the ban on SH6 be extended to include the areas from the existing southern foreshore no camping zone at the Holiday Park to the edge of Kidd's Bush campsite and

2. that the ban extend from the Eastern edge of the John Creek reserve (which is part of the Southern foreshore no camping zone) to the entrance to Dingleburn station all along Timaru Creek Road, a QLDC road.

Final recommendation:

- The Guardians believe that the 2012 Freedom Camping Act needs to be completely revised so that all freedom camping is banned in the district apart from areas where it is deemed appropriate to permit it.
- The Guardians request Council to urge the Government to repeal the existing Freedom Camping Act and create a new Freedom Camping Act that is fit for purpose.

New Zealand is fast losing its 'clean, green' image; a change of culture is required so that our environment is protected in order that locals and visitors may enjoy it.

From

Richard Hutchison

7 Schist Lane

Wanaka 9305

E mail hutchwanaka@gmail.com

Phone 027 443 8781.

I would like to speak to my submission.

Firstly I am addressing Mr.Bolt directly in many of my comments as I read recently that he stated he gets very few complaints now about Freedom Camping.

I humbly suggest those “complaintees” have probably died of frustration or boredom in the expectation getting anything meaningful achieved.

If other comments I have attributed to him are not correct I apologise.

History and Experience in Accommodation Industry.

1992 : Bought Bayview Motel on Studholme Road North Wanaka.

2000 : Opened Aspiring Campervan Park on land adjoining Bayview Motel. At that time Aspiring Campervan Park was judged to be the highest standard by which all other Holiday Parks in NZ would be judged by Qualmark New Zealand.

This was indicated by Qualmark as having the most innovative features at that time, including underfloor heating, complimentary spa pools and sauna, specific large drying room for ski gear, ski and snowboarding tuning area.

I operated and ran the two accommodation complexes until 2014 when I sold it and now operates as Wanaka Kiwi Holiday Park and Motel.



At this point I will for those who don't know , Qualmark is the official standard of accommodation governed by Tourism New Zealand. Only Qualmark approved accommodation providers may appear on Tourism New Zealand web sites or publications.

Quality, Safety and Sustainability are the standards by which accommodation providers are assessed by Qualmark. For a comprehensive list of the merits of Qualmark accreditation inspect their web site at Qualmark.co.nz

Literally hundreds of factors are assessed, including and necessitating, commitment to sustainability, community projects, etc.

There are three standards of achievement. Bronze, Silver and Gold.

Accommodation businesses spend tens of thousands of dollars in order to achieve these standards.

Included in the rest of my submission I have included the term "New Zealand Government", which in general means the politicians representing all the electorates in Wellington .

.....

I live in Wanaka, part of the Southern Lakes area including Queenstown and Lake Wanaka and Lake Hawea. I feel extremely privileged to be living here and being able to enjoy some of the most outstanding scenery and lifestyle anywhere in the world.

Over the past 20 years I have seen a degradation of the landscape caused by increasing numbers of "Freedom Campers", and the filth and devastation caused by this group of people.

Their behaviour can be directly attributed to the total lack of meaningful discipline and rules of which our New Zealand Government abrogated responsibility, by passing the problem to local councils.

I could understand this behaviour from the previous government which appeared to sponsor economic growth at any price, but am somewhat surprised, that this present government which is a composite of Labour and the Green Party together with New Zealand First have after so many years in opposition, have absolutely no idea on how to tackle the problem of "freedom camping".

FREEDOM TO POLLUTE

Literally hundreds of thousands of words have been written about the problem of freedom camping.

New Zealand Government officials, councils and the public have all promoted various cures for this growing blight on our countryside.

This is not a new or fresh problem. It has been growing like a pus filled sore for at least two decades now. It has been exacerbated immensely by the growing use of the internet.

The problem has been acknowledged for at least a decade or more, and the New Zealand Government responsible for tourism was forced to recognise and of course came up with some legislation which did absolutely nothing to face up to this growing canker. They just passed the problem onto councils.

The most critical consideration of all, which neither New Zealand Government, or councils have ever understood (and understanding the mentality of most bureaucracies,why am I never surprised) is :

If you give something away for nothing it has no value.

I will repeat this : If you give something away for nothing, it is perceived as having no value, and will never be respected.

Once more. If you give away something of value for nothing, IT WILL NOT BE RESPECTED.

I do not apologise for the repetition, for at a most local and government levels it appears that this concept is completely foreign.

The Internet via Facebook, Instagram etc. ensures a constant and prolific flow of photographic and video images that truly represent our magnificent environment. Images of Wanaka and surrounding area often feature on covers of International Photographic Magazines and win International Landscape awards.

We do not need, want, desire, or encourage visitors who do not respect our environment.

I have listened with dismay for the past two decades of our bureaucrats' inane nonsense about educating these travellers.

The truth is : **YOU CANNOT EDUCATE THOSE WHO DO NOT WISH TO BE EDUCATED.**

If you come from another country, are travelling around in a clapped out van, and with very little financial equity, the last thing you are ever going to take notice of is an appeal to pay for your way.

These people do **NOT WANT TO BE EDUCATED.** They want to freeload, they do not want to pay their way. They want the taxpayers of New Zealand to provide, facilities etc.

They will of course smile, agree with any suggestions made, accept all the brochures and take no notice whatsoever. Fines in general are ignored as many of the offenders are on a once only trip to NZ.

Mr. Bolt in my 23 years in the accommodation industry I have employed many many young people travelling around in campervans. They have their own Internet web sites in many different languages, they constantly exchange information on where and when to camp, how to avoid paying tickets and the type of behaviour to exhibit if challenged.

New Zealand is an International joke when it comes to supervising and disciplining errant Freedom Campers.

The next great New Zealand joke : **"SELF CONTAINED"**.

This sticker "Policy" is the result of another utter and complete waste of taxpayers and ratepayers money.

It is a sticker which is supposed to indicate that the van on which it is attached, has self-storage for human waste, may be emptied at approved waste sites, and therefore may camp at all approved

sites for 'Self Contained Vans'. Every tiny van in NZ seems to have one. I have heard all types of rumours that a "potty" qualifies, or on rental vans where they provide a mini "porta loo", there is a charge of \$150 to clean it if used.

Council officers for years, and thus senior council officials have ignored that in any supermarket carpark, at any tourist "hot spot" there are hundreds of vans with a pictorial sticker on the back of their vans proclaiming "Self Contained"

It is incomprehensible that any council officer, Mayor other suitably employed inspector can believe small and quite often old vans have this facility, and yet they expect the public to believe these vans are "Self Contained" are as stated.

They are not, never can be "Self Contained" and it is reprehensible that senior council officials continue to accept this same old "Bullshit" year after year.

Mr, Bolt assures us at various times that "No Ratepayers Money" is spent providing and improving facilities for Freedom Campers. It is grants from "The New Zealand Government".

Mr Bolt, the money that comes from the "Government" comes from Taxpayers, so yes, in one way or another we are paying for you to provide facilities to encourage our freeloading visitors.

How Councils Economically assault your local camping ground operators.

About this time last year I relocated a campervan from Queenstown to Auckland.

What I witnessed throughout the South and North Island was repetitious in its monotony.

From Queenstown north the picture was the same. The best example I can give was in New Plymouth.

I stayed in a very nice campground at Fitzroy Beach. There were only 2 or 3 vans there.

I visited the Waiwhakaiho River mouth a day later, an area designated for the public for walks, etc and could not get a park there as all the parking spaces were taken up by campervans freedom camping there. This is typical of what happens all over New Zealand.

Legitimate operators are being penalised out of business. Your own council has officers inspect Holiday Parks, Motels etc with a stringent list of rules and regulations.

For Campgrounds and Holiday Parks there does exist a document :

Camping Ground Regulations 1985

SR 1985/261

Pursuant to section 120B of the Health Act 1956, His Excellency the Governor-General, acting by and with the advice and consent of the Executive Council, hereby makes the following regulations

These regulations are a 12 or 13 page document, giving instructions of facilities to be provided , eg. how many toilets per so many people, sanitary facilities etc etc etc., all of which may I add Mr,Bolt have been blithely ignored by not only the QLDC but many other councils around New Zealand.

In other words Mr. Bolt, the QLDC and many other councils in NZ have been establishing de-facto camping grounds in complete contradiction to the camping ground rules which were established to ensure the safety and health of all New Zealanders.

To return once again to the efforts made by legitimate camp-ground operators who may wish to be Qualmark assessed and graded.

In order to achieve the highest standards required by Tourism New Zealand the following criteria need to be met by Qualmark.

Literally hundreds of factors are assessed, including and necessitating, commitment to sustainability, community projects, etc.

It costs legitimate operators tens of thousands of dollars to promote New Zealand in an ethical and sustainable manner while councils actively **ECONOMICALLY UNDERMINE** these legitimate operators by allowing and promoting freedom camping.

New Zealand is at the moment encouraging all manner of activities in order to restrict the effects of global warming. I hardly think that encouraging budget travellers flying very long distances on cheap airfares and when they arrive in New Zealand, purchase old and fairly polluting vans, and encourage them by providing free services, is a way in which to accomplish the desired reduction of gases causing climate change.

It should be argued that the New Zealand Government has been at fault by not taking complete responsibility for the concept of “Freedom Camping” in the first place.

It should not be left to councils to try and provide comprehensive and equitable regulations, which in turn end up by having no common basis, and thus an embarrassment of individual requirements.



STATEMENT OF PROPOSAL

PROPOSED FREEDOM CAMPING BYLAW 2019

INTRODUCTION

- 1 The Queenstown Lakes District Council is seeking public feedback on its proposal to make a new bylaw to regulate freedom camping in the Queenstown Lakes District. The proposed bylaw will replace the QLDC Freedom Camping Control Bylaw 2012 (**current bylaw**). The current bylaw sets out the rules regarding where freedom camping is permitted, restricted or prohibited within the District. However, the current bylaw will be revoked by operation of law in December 2019.
- 2 There is an identified need for Council to continue to regulate freedom camping in the District. The Council therefore proposes to adopt a new Freedom Camping Bylaw 2019 (**proposed bylaw**) to replace the current bylaw. The proposed bylaw will adopt the same approach as the current bylaw, but be drafted in a more simplified way.
- 3 Council officers have consulted with internal and external stakeholders to identify matters within the current bylaw that require updating, and to address specific concerns they have with the current bylaw. Council officers have also sought legal advice about the drafting improvements that could be made to the current bylaw.

LEGISLATIVE FRAMEWORK

- 4 The Freedom Camping Act 2011 (**FCA**) allows freedom camping anywhere in a local authority area, except at those sites where the local authority makes a bylaw defining local authority areas in which freedom camping is specifically prohibited or restricted. Local authority areas are, in general terms, accessible public places, such as reserves, roads, and laybys, other than camping grounds.
- 5 The current bylaw is due to expire in December 2019, and the Council must consider whether to make a new bylaw, and if so, in what form, or whether to no longer regulate freedom camping in this way.

PROPOSAL

- 6 The Council proposes that:
 - a. a new bylaw should be made;
 - b. the proposed bylaw should be made easier to understand than the current bylaw; and
 - c. the areas in which freedom camping is prohibited should be expanded.
- 7 The proposal to make a new bylaw to control freedom camping must follow the special consultative procedure in the LGA.
- 8 This Statement of Proposal has been prepared in accordance with the requirements of sections 83 and 86 of the LGA, and includes:
 - a. Consideration of whether the bylaw is necessary to protect the areas in which it is proposed to prohibit or restrict freedom camping, the health and safety of people who may visit those areas, or access to those areas;
 - b. Consideration of whether a bylaw is the most appropriate and proportionate way of addressing the perceived problem in relation to the areas in which it is proposed to prohibit or restrict freedom camping;

- c. consideration of the bylaw's consistency with the New Zealand Bill of Rights Act 1990;
- d. a draft of the proposed Freedom Camping Bylaw 2019.

CONSIDERATION UNDER SECTION 11 OF THE FREEDOM CAMPING ACT 2011

- 9 The District is home to approximately 37,000 residents and is a significant tourist destination. As the long-term plan records, on its busiest days there are more than 100,000 people in the District. A significant number of people, tourists and residents alike, freedom camp as a means of accommodation.
- 10 Prior to 2012 when the current bylaw was made, it was recognised that controlling freedom camping was necessary to protect the District's environment, including visual amenity and landscapes, and waterways.
- 11 During the life of the current bylaw, Council officers have continued to observe poor behaviour from campers leaving an environmental impact. The high number of freedom campers poses health and safety risks from human waste and reduces the accessibility of waterways and reserves.
- 12 Council staff have received anecdotal evidence of freedom campers defecating on the land (ie rather than using toilets). Public concerns around freedom camper behaviour also remain, such as washing in lakes and rivers, causing damage to the environment and overcrowding. The Council receives daily complaints from the public about freedom campers.
- 13 Since the current bylaw was made, the Council has, in 2018 adopted its Responsible Camping Strategy. That Strategy identifies the following problems:
 - Poor behaviour from some campers is leaving an environmental impact.
 - In some cases people are avoiding recreation areas because of human waste and poor camping behaviour.
 - Free camping areas have become quickly overwhelmed and have resulted in unacceptable on-site and off-site effects.
 - Camping (both self-contained and non-self-contained) can limit locals' access to recreational facilities and sites and detract from their local experience.
 - Frequent and persistent camping (both self-contained and non-self-contained) can impact on residents' privacy and quiet enjoyment of their property.
- 14 However, it is important not to overstate the problem. Frequently complaints from the public are about freedom camping generally, rather than about any illegal or unlawful activity from campers. And Council officers and contractors enforcing the bylaw have reported that there are only a small number of infringement notices issued compared to the large number of lawful campers in the region.
- 15 The Council's Responsible Camping Strategy identifies a number of non-regulatory actions that it is seeking to reduce the problem. Implementation of these commenced in the 2018/2019 peak season and have reduced the numbers of complaints and infringements. These include:
 - Providing additional dump stations (long term);
 - Utilising the Tourism Infrastructure Funding to provide temporary hubs for limited overnight camping, washing and waste disposal;
 - Employing Responsible Camping Ambassadors to educate campers
 - Increasing the numbers of public toilets.

- 16 The Council did not undertake a full review of the current bylaw by December 2017. A minor amendment of the 2012 bylaw was undertaken in 2018 to address two problematic camping areas in the Wakatipu, using the special consultative procedure. A full review was not carried as the Responsible Camping Strategy was in preparation and a full review would pre-empt the Strategy's recommendations. A work programme has been adopted which indicates a comprehensive review of the areas freedom camping zones and how the bylaw works, should be undertaken in approximately 2022 once other actions are implemented.
- 17 Despite these steps, it is necessary at this stage to continue to control freedom camping in order to protect residential and built-up areas where it is proposed to prohibit freedom camping, the health and safety of people who may visit those areas, or access to those areas, and to restrict freedom camping elsewhere throughout the district. Limiting freedom camping to self-contained vehicles will reduce the overall level of demand for freedom camping to those with access to self-contained vehicles.
- 18 Council could also use the Reserves Act 1977 (Reserves Act) to regulate (prohibit or restrict) freedom camping rather than a bylaw or the FCA. Section 44(1) of the Reserves Act provides that no person can use a reserve, or any vehicle, caravan, tent, or other structure situated on the reserve, for the purposes of permanent or temporary accommodation. Therefore, freedom camping on reserves is prohibited unless provided for in a Reserve Management Plan or Council exercises its delegated ministerial consent. While this mechanism could be used to part-regulate freedom camping, it would not remove the need for a bylaw altogether because it would not address roadside camping or land managed by the Council under another enactment.
- 19 A bylaw is the most effective mechanism to provide for prohibited local authority areas and restricted local authority areas
- 20 While internal and external stakeholders were unified in identifying a continuing need for a bylaw, views were mixed as to the efficacy of the current bylaw. Stakeholders reported that members of the public find the current restricted or prohibited areas in the bylaw difficult to understand. Legal advice also suggests that the drafting of the bylaw provisions themselves are convoluted and could be simplified, and that a number of definitions and provisions are potentially confusing as they unnecessarily repeat parts of the FCA.

IS THE PROPOSED BYLAW THE MOST APPROPRIATE AND PROPORTIONATE WAY OF ADDRESSING THE PROBLEM?

Proposed new prohibited areas

- 21 Under the current bylaw, freedom camping is prohibited in:
- Lake Hawea
 - Wanaka
 - Arrowtown
 - Lake Hayes Estate
 - Quail Rise
 - Arthurs Point
 - Queenstown
 - Jacks Point/Wye Creek
 - Kingston
 - Kinloch
 - Glenorchy
 - Makarora

- 22 Since 2012, residential areas have expanded in Lake Hawea, Wanaka, Alberttown, Luggate, Cardrona, Arthurs Point, Jacks Point, Lake Hayes Estate, Kingston and Gibbston Valley. These are a combination of low-high residential areas and rural lifestyle areas/townships.
- 23 New residential subdivisions are also under construction in Hanley's Farm, Bridesdale Farm, Shotover Country, Coneburn, Hawea, Frankton Flats.
- 24 It may be perceived from the updated bylaw maps that the areas where freedom camping is prohibited has substantially increased, however this is simply reflecting the strong residential growth of the District.
- 25 Two sections of road that have become 'hotspots' for freedom campers have also been added to the maps.
- 26 One is between Queenstown and Glenorchy. The road is very narrow and winding and not safe for vehicles to pull over. The Department of Conservation (DOC) has also recently gazetted all conservation land along this road in order to prohibit freedom camping on the lakeside reserves through the Reserves Act. Including the road reduces the safety risks and aligns QLDC's and DOC's freedom camping restrictions.
- 27 The second section of road is Mt Aspiring Road from Wanaka township to Glendhu Bay. This road is also narrow and winding, and the lakeside road reserves were experiencing high numbers of freedom campers that adversely impacted public recreation access to Roys Peak and, given the rubbish and toileting issues caused, were having a health and safety effect. There is also anecdotal evidence that freedom campers were camping on the road reserve outside the two campgrounds located along this road.
- 28 The Council has considered the most appropriate way of addressing the issues described in the problem definition section above, the options available, and determined that the proposed bylaw is the most appropriate means for addressing the issues.
- 29 In considering whether a bylaw is the most appropriate and proportionate way of addressing the problem, the Council has considered the following options:
- a. Option 1 – Do nothing.
 - b. Option 2 – Make a bylaw identical to the Freedom Camping Control Bylaw 2012.
 - c. Option 3 – Adopt the proposed Freedom Camping Bylaw 2019, is drafted more simply, and which increases the areas in which freedom camping is prohibited.
- 30 Option 3 is the proposed option.

Option 1 – Do nothing

- 31 If the Council does nothing, the current bylaw will be automatically revoked in December 2019 and there will be no bylaw in place defining any prohibited or restricted areas in the District. Freedom camping of all kinds (not just in self-contained vehicles) will become lawful in all local authority areas of the District. Freedom camping using tents and non-self-contained vehicles is likely to increase.

- 32 One advantage of this option is it does not require the Council to undertake a special consultative procedure this year, nor will there be any financial or resource costs incurred in enforcing any new bylaw. But enforcement officers will still be required to enforce the infringement offences of the FCA that do not relate to camping in prohibited or restricted areas (eg damage to flora and fauna, or dumping of waste).
- 33 The Council can also continue to use non-regulatory approaches to manage freedom camping. It is hoped that these measures will reduce the problem, but that may be more difficult if the number of non self-contained freedom campers has increased. Public expectation is that Council will regulate and enforce freedom camping. As freedom camping is prohibited under the Reserves Act, Council could enforce through the Reserves Act, but while this mechanism could be used to part-regulate freedom camping, it would not remove the need for a bylaw altogether because it would not address roadside camping or land managed by the Council under another enactment.
- 34 Finally, the Council would be acting inconsistently with its own Responsible Camping Strategy, which is based on promoting self-contained vehicle usage
- 35 While the Council may decide to adopt a new bylaw at a later time after the current bylaw is revoked, this option means that there will be no bylaw in force for the 2019-2020 peak freedom camping season, which is generally between November and March.

Option 2 – Adopt a bylaw identical to the Freedom Camping Control Bylaw 2012

- 36 If the Council adopts a bylaw identical to the current bylaw, its enforcement of the restricted and prohibited areas in the District will continue much as it currently does. Advantages include that Council can continue to issue freedom camping infringement notices in prohibited and restricted areas in the District. Continued enforcement will reduce the risk of environmental damage, and also provide for greater accessibility to these areas for all. Council will be acting consistently with its own Responsible Camping Strategy.
- 37 Disadvantages include that stakeholder feedback has identified that the current bylaw is difficult to understand and, as identified by legal advice, contains significant drafting anomalies. New and expanded residential areas such as Hanleys Farm, Shotover Country and Hawea would be excluded from the restricted and prohibited areas as they did not exist when the 2012 bylaw was adopted and problem areas such as the Glenorchy Road would not be addressed.

Option 3 – Adopt the proposed Freedom Camping Control Bylaw 2019, and revoke the Freedom Camping Control Bylaw 2012.

- 38 The Council considers that the proposed bylaw will have all the advantages of the current bylaw, but also be more user-friendly and consistent with the FCA. The proposed bylaw substantially reduces duplication. The Council will therefore be acting consistently with feedback received from stakeholders to simplify the bylaw and make it easier for users to understand.
- 39 Disadvantages include that the proposed bylaw expands areas in which freedom camping is prohibited. This is considered necessary to protect the amenity and health and safety of residents of newly expanded or developed residential areas. It does have the effect of conversely reducing the area in which freedom camping is allowed in self-contained vehicles.

ARE THERE ANY IMPLICATIONS UNDER THE NEW ZEALAND BILL OF RIGHTS ACT 1990?

- 40 The proposed bylaw will potentially engage the right to freedom of movement in section 18 of the New Zealand Bill of Rights Act 1990 (NZBORA). However, the proposed controls are considered reasonable limits on that right as allowed for in section 5 of the NZBORA:

Subject to section 4, the rights and freedoms contained in this Bill of Rights may be subject only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society.

- 41 If engaged, the right to freedom of movement does not obviously encompass a right to remain in a certain place for the purpose of camping overnight. But if engaged, the inconsistency is a minor one and is based on a rational link between the bylaw provisions and the objective of controlling the adverse effects of freedom camping. The expansion of proposed areas for prohibition remains a proportionate control.

TIMETABLE FOR CONSULTATION

- 42 The following dates represent the key times in the consultation programme:
- a. Council resolves to undertake public consultation regarding the Proposal at its meeting of 10 October 2019.
 - b. Submissions open on 11 October 2019.
 - c. Advertisement in Otago Daily Times, Southland Times, Mirror and Wanaka Sun – between 11 October 2019 and 18 October 2019.
 - d. Submissions close on 11 November 2019.
 - e. Submissions heard by a subcommittee of Councillors in Queenstown on mid November 2019 and in Wanaka in mid November 2019.
 - f. Council considers outcome of consultation process and whether to make decisions on the Proposal – 12 December 2019.

INSPECTION OF DOCUMENTS AND OBTAINING COPIES

- 43 Copies of this Statement of Proposal and the proposed bylaw may be inspected, and a copy obtained, at no cost, from:
- a. either of the Council offices at 10 Gorge Road, Queenstown or the Wanaka Service Centre, 47 Ardmore Street, Wanaka;
 - b. any Council library within the Queenstown Lakes District; or
 - c. the Council website – www.qldc.govt.nz.

RIGHT TO MAKE A SUBMISSION AND BE HEARD

- 44 Any person or organisation has a right to be heard in regard to this Proposal and the Council encourages everyone with an interest to do so. Submissions should be directed toward matters that are within the scope of the Proposal.
- 45 The Council would prefer that all parties intending to make a submission:

- a. go to the Queenstown Lakes District Council Website: www.qldc.govt.nz or
 - b. post their submission to: Regulatory Department, Queenstown Lakes District Council, Private Bag 50072, Queenstown 9348.
- 46 Submissions must be received by **Monday 11 November 2019**. The Council will then convene two hearings, which it intends to hold in Queenstown in mid-November at which any party who wishes to do so can present their submission in person. The Council will give equal consideration to written and oral submissions.
- 47 The Council will permit parties to make oral submissions (without prior written material) or to make a late submission, only where it considers that special circumstances apply.
- 48 Every submission made to the Council will be acknowledged in accordance with the LGA, will be copied and made available to the public, and every submission will be heard in a meeting that is open to the public.
- 49 Section 82 of the LGA sets out the obligations of the Council in regard to consultation and the Council will take all steps necessary to meet the spirit and intent of the law.

MAKING AN EFFECTIVE SUBMISSION

- 50 Written submissions can take any form (eg email or letter). An effective submission references the clause(s) of the proposed bylaw you wish to submit on, states why the clause is supported or not supported, and states what change to the clause is sought.
- 51 Submissions on matters outside the scope of the Proposal cannot be considered by the Hearings Panel.

Mike Theelen
CHIEF EXECUTIVE

APPENDIX 1 – Proposed Queenstown Lakes District Council Freedom Control Bylaw 2019.

APPENDIX 2 – Current Queenstown Lakes District Council Freedom Camping Control Bylaw 2012.

[Insert coat of arms]

DRAFT Freedom Camping Bylaw 2019

Queenstown Lakes District Council

Date of making: [Insert]

Commencement: [Insert]

This bylaw is adopted under section 11 of the Freedom Camping Act 2011.

Contents

	Page		Page
Part 1 – Preliminary		Part 4 – General Provisions	
1 Title and Commencement		9 Relationship of Bylaw to Ngai Tahu Claims Settlement Act 1998	
2 Area within which Bylaw applies		10 Delegation	
3 Purpose		11 Savings	
4 Interpretation			
Part 2 – Restrictions on freedom camping		Schedule A – Prohibited and Restricted Areas	
5 Freedom camping prohibited in certain local authority areas			
6 Freedom camping in restricted local authority areas			
7 Freedom camping permitted			
Part 3 – Discretionary consent to freedom camp			
8 Consent to freedom camping otherwise prohibited or restricted			

Part 1 – Preliminary

1 Title and Commencement

- 1.1 This bylaw is the “Freedom Camping Bylaw 2019”.
- 1.2 This bylaw comes into force on 19 December 2019.

2 Area within which Bylaw applies

- 2.1 This bylaw applies to the Queenstown Lakes District.

3 Purpose

- 3.1 The purpose of this bylaw is to:
 - (a) encourage responsible freedom camping in the District;
 - (b) recognise freedom camping as part of Aotearoa New Zealand’s culture and a valued tourist experience;
 - (c) control freedom camping in order to protect the environment, including the District’s lakes and rivers, from harm.
- 3.2 The bylaw achieves this purpose by:
 - (a) defining the areas in the District where freedom camping is permitted, restricted or prohibited; and
 - (b) providing for the restrictions that apply to freedom camping in areas where freedom camping is restricted

so that the areas, access to the areas, and the health and safety of people who may visit the areas, are protected.

4 Interpretation

- 4.1 In this bylaw, unless the context otherwise requires,-

Act means the Freedom Camping Act 2011.

Council means the Queenstown Lakes District Council.

person has the meaning given in the Interpretation Act 1999.

self-contained vehicle means a motor caravan, caravan, campervan, or any other vehicle designed and built for the

purpose of camping for which a self-containment certificate has been issued under NZS 5465:2001.

- 4.2 Words or phrases used in this Bylaw shall have the same meanings as defined in the Act.
- 4.3 Any explanatory notes and attachments are for information purposes, do not form part of this Bylaw, and may be made, amended and revoked without any formality.
- 4.4 The Interpretation Act 1999 applies to this Bylaw.

Part 2 – Restrictions on freedom camping

5 Freedom camping prohibited in certain local authority areas

- 5.1 No person may freedom camp in a local authority area marked as prohibited in Schedule A of this Bylaw.

6 Freedom camping in restricted local authority areas

- 6.1 Any local authority area not marked as prohibited or permitted in Schedule A of this Bylaw is a restricted local authority area.
- 6.2 A person may freedom camp in a restricted local authority area only if using a self-contained vehicle.

7 Freedom camping permitted

- 7.1 A person may freedom camp in a local authority area marked as permitted in Schedule A of this Bylaw, whether or not using a self-contained vehicle.

Part 3 – Discretionary consent to freedom camp

8 Consent to freedom camping otherwise prohibited or restricted

- 8.1 A person may apply in writing to the Chief Executive of the Council for consent to freedom camp in a local authority area in which freedom camping is prohibited or restricted.
- 8.2 The Chief Executive may, if satisfied that to do so would not be contrary to the purpose of this Bylaw, grant consent to freedom

camp in a local authority area in which freedom camping is prohibited or restricted with or without conditions.

- 8.3 A person freedom camping under a consent granted under subclause (2) must:
- (a) comply with any conditions specified;
 - (b) leave the site clean and tidy;
 - (c) not light any fire.
- 8.4 An enforcement officer may revoke a consent granted by the Chief Executive and direct any person freedom camping in accordance with that consent to immediately leave the site if satisfied that:
- (a) Any person has breached any of the conditions specified in the consent;
 - (b) Any person has acted in a manner likely to endanger the health and safety of any other person;
 - (c) Any person has damaged or is likely to damage the site.

Part 4 – General Provisions

9 Relationship of Bylaw to Ngai Tahu Claims Settlement Act 1998

- 9.1 This bylaw does not limit or affect nohoanga entitlements granted under the Ngāi Tahu Claims Settlement Act 1998.

10 Delegation

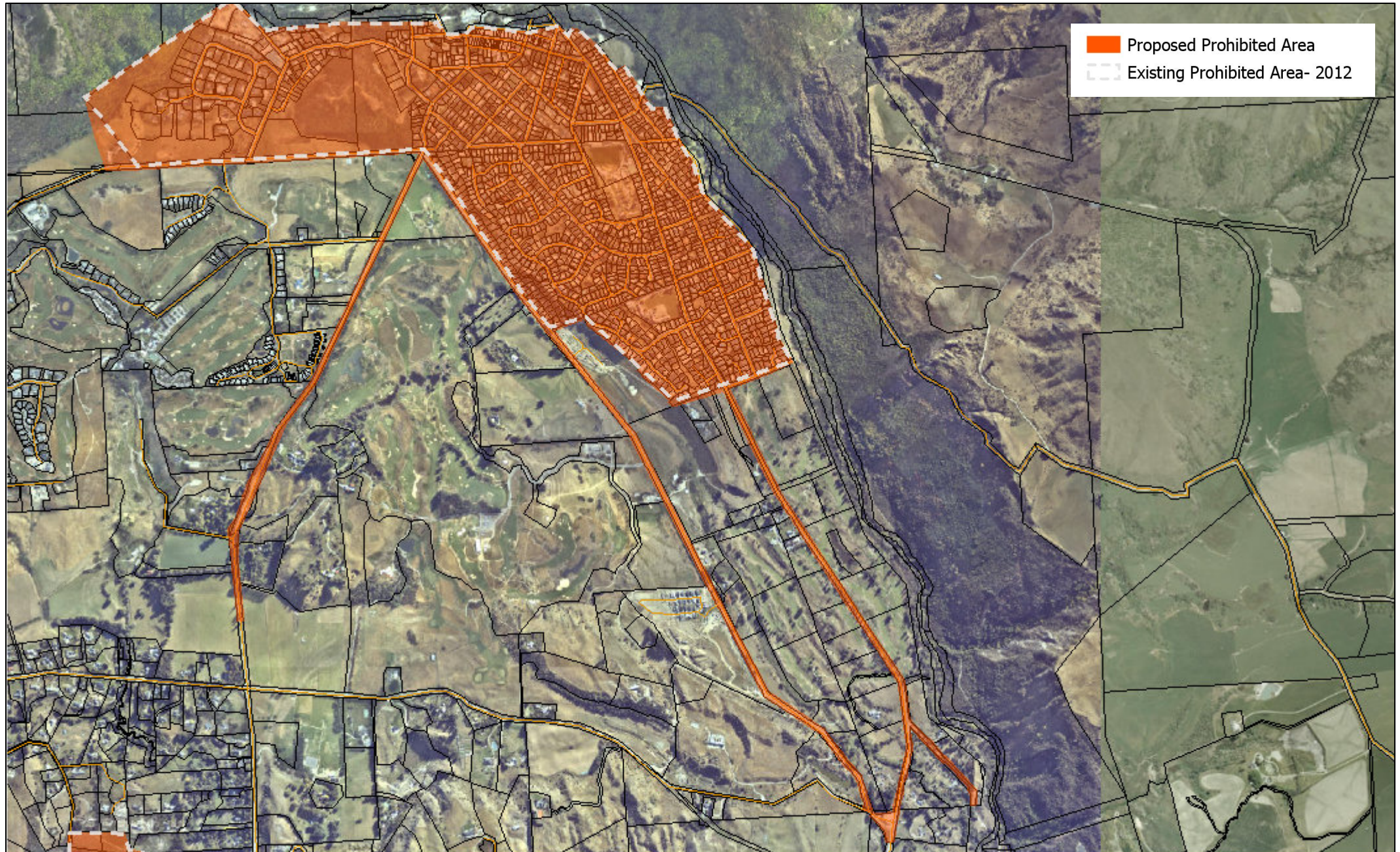
- 10.1 Any of the various powers and functions of the Council as detailed and set out in this bylaw, may be delegated by it, to its Chief Executive and sub-delegated by the Chief Executive to any such other Officer of the Council.

11 Savings

- 11.1 Any discretionary consent to freedom camping granted by the Chief Executive under clause 6 of the Queenstown Lakes District Council Freedom Camping Control Bylaw 2012 shall, despite the revocation of that bylaw, continue as if granted under clause 8.2 of this Bylaw.

Schedule A – Prohibited and Restricted Areas

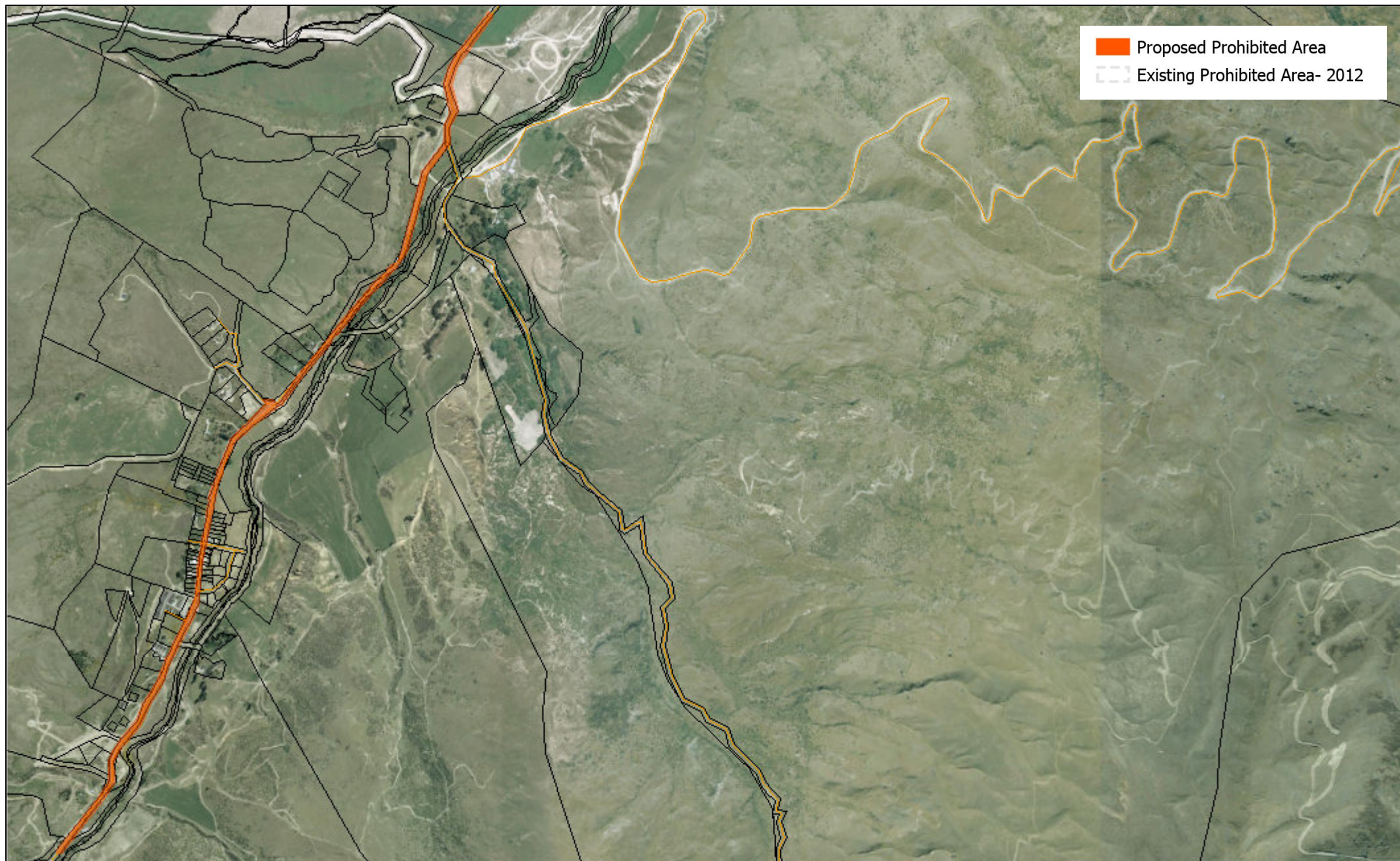
Arrowtown



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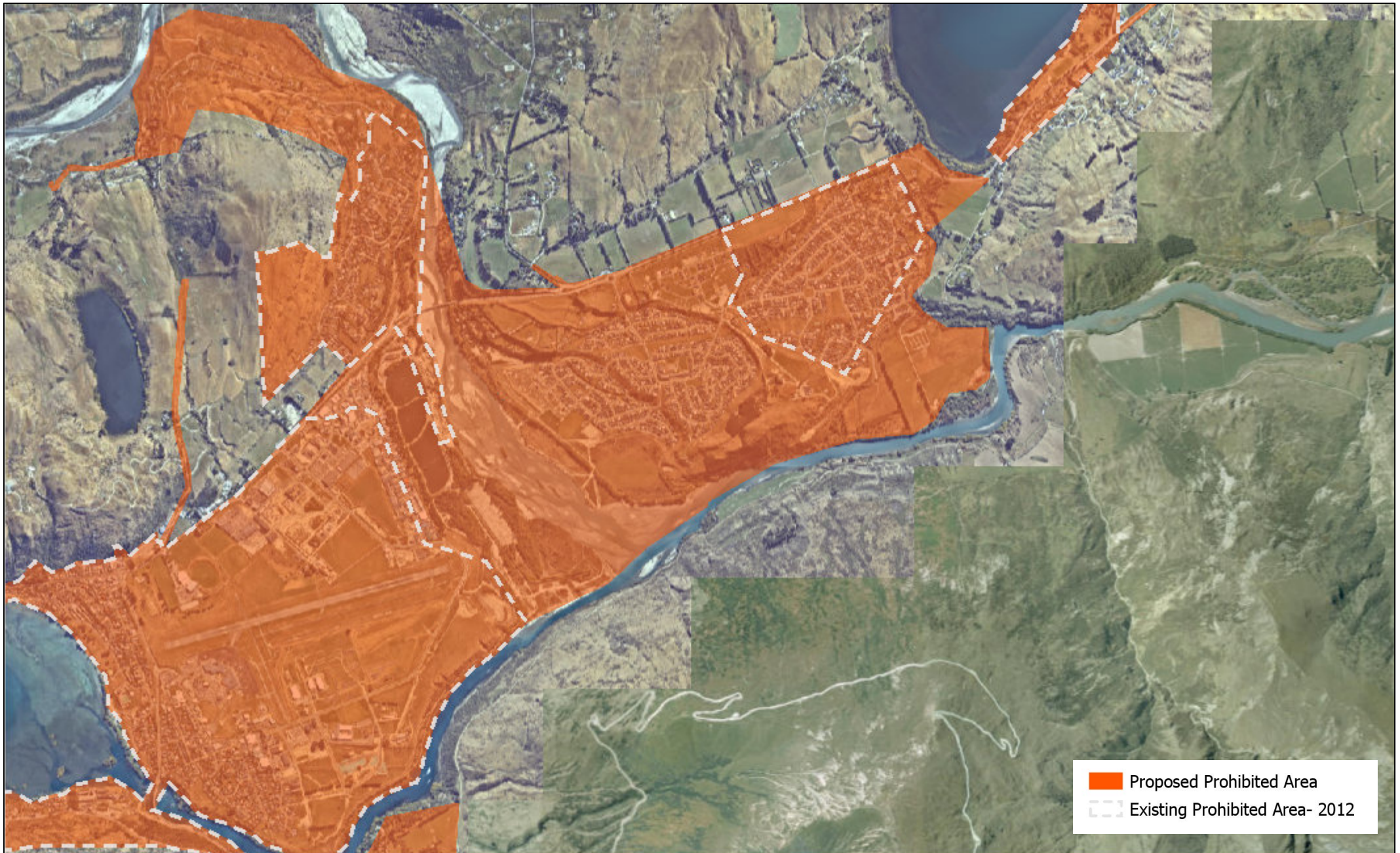
Cardrona Valley



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Frankton & Lake Hayes



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Gibbston



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Glenorchy-Queenstown Road



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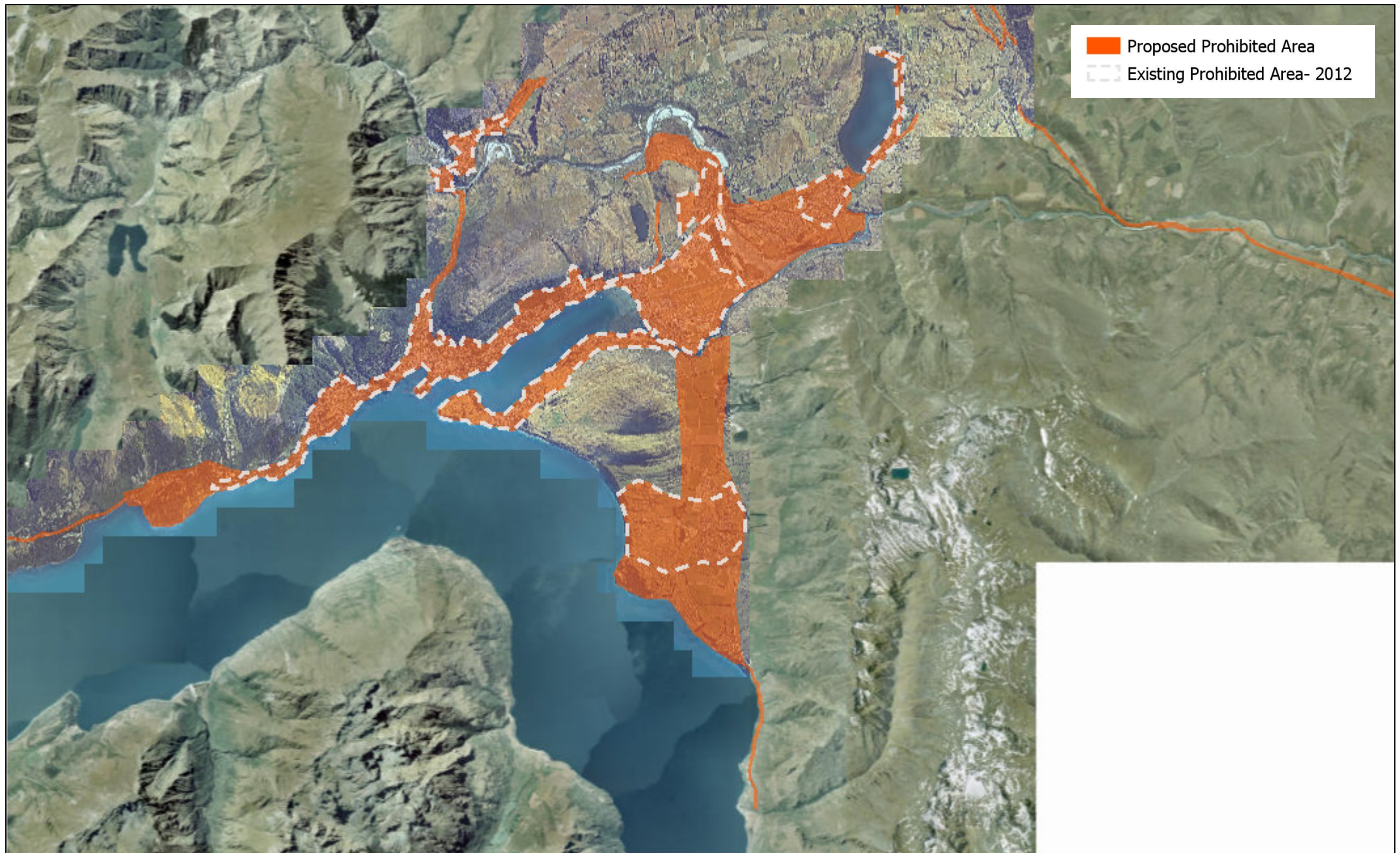


Lake Hawea



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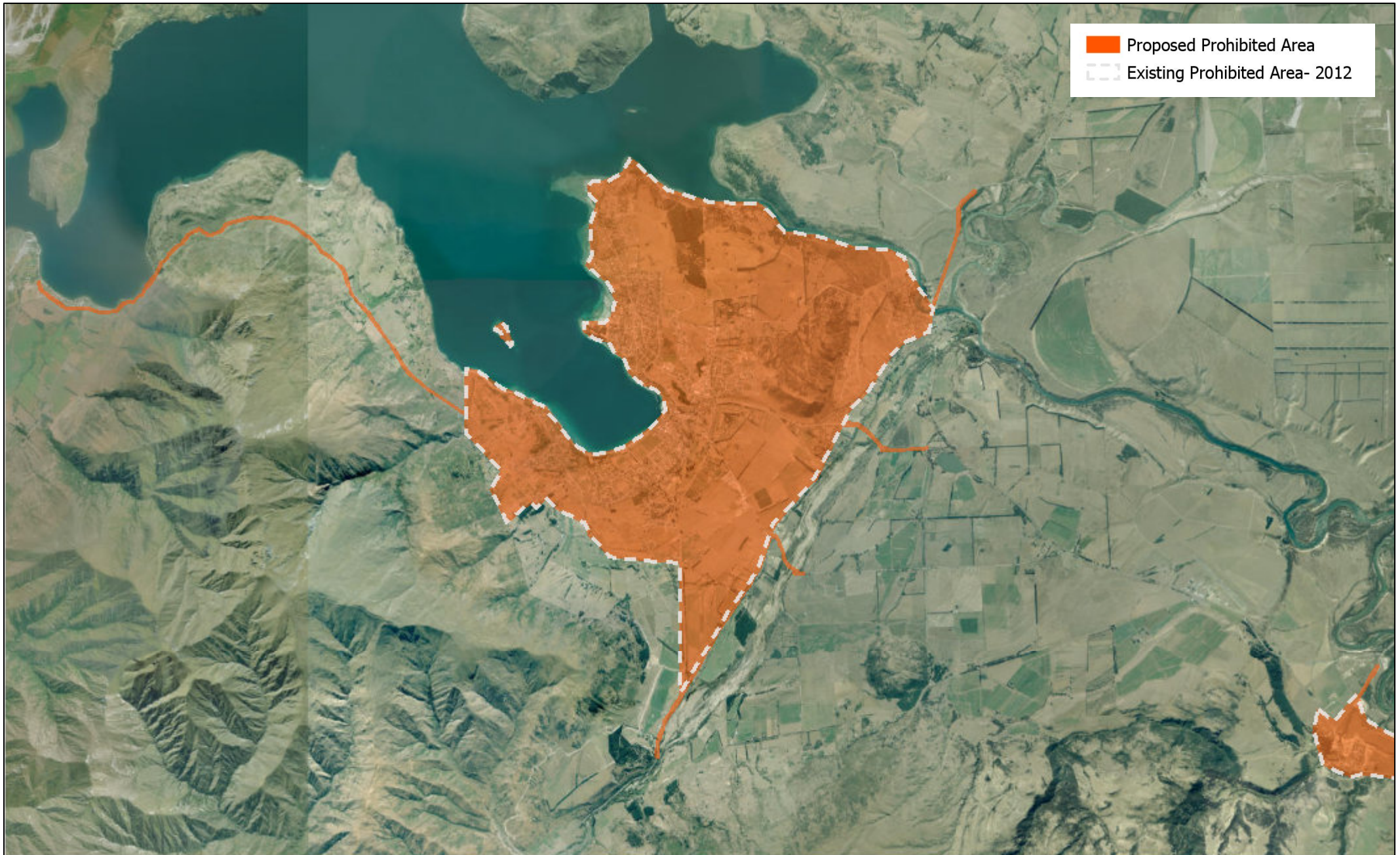
Wakatipu Basin



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Wanaka



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