

APPENDIX FOUR – SUMMARY OF SUBMISSIONS

Support for self-contained only

Comments from submitters in support of self-contained vehicles are summarised below:

Contribution to the local economy:

- Self-contained campers contribute to the economy.
- Tourists should be seen as a source of tourist revenue.
- Money spending tourists will go elsewhere if there are not enough parking spaces provided for freedom campers.
- MBIE estimate freedom campers spent on average about \$4,880 per person.

Feedback in regard to the location of freedom camping sites:

- One submitter noted the importance of restricting / prohibiting freedom camping near campgrounds, sites that are culturally significant to Maori, and sites that have a high volume of users.
- It is fair for self-contained campers to be able to park and enjoy their chosen lifestyle – not be treated as second-class citizens and put into out of the way places.
- Freedom camping is a wilderness activity – not for groups of non-self-contained vehicles hanging out in prime locations.
- Self-contained camping should be allowed anywhere it is safe, but should be policed.
- In banning non-self-contained freedom campers the pressure on various sites will be considerably reduced, so why do you set out to restrict, prohibit and control self-contained campers – can you prove that the sites you declare unsuitable, are in need of prohibition or control?
- Self-contained campers should not be tarred with the same brush as non-self-contained (or penalised for non-self-contained campers' actions).

Greater restrictions for freedom camping – including self-contained vehicles:

- Freedom campers should be required to use campgrounds, which have occupancy available the majority of the time.
- Freedom camping should also be prohibited in the 'designated carparks' you have provided.

Protection of local areas for the community

- Large number of freedom campers may destroy the value of areas for the local community.
- Should be rate payers first, and then tourists paying for their fair share.
- Public carparks are overrun with campers and their set ups (tables etc.).
- Feel unsafe living near freedom campers.

Some comments reflected the issues that the Council has observed:

- Is frustrating when freedom campers take up parking spaces that locals use for weekend activities (surfing / fishing).

- The number of freedom campers is growing every summer and most local residents are not happy about this.
- The sight of people coming out of bushes with a toilet roll is not tourist friendly look for the district. (urinating and defecating in public ruins our beautiful areas).
- Freedom campers blot the landscape, ruin views.
- Need to protect the environment.

Cost of providing for non-self-contained campers

- Ratepayers should not be asked to fund overseas tourists.
- To carry out any further investigation for allowing non-self-contained campers will only cost the rate payer more (why waste more council officer resource to investigate options that will most likely not proceed).
- Council under pressure to reduce rate increases, so should they really elect to fund new buildings to accommodate non-self-contained campers?
- Sites for non-self-contained campers lead to expensive maintenance costs.
- The benefits to communities from welcoming non-self-contained campers are most likely outweighed by the costs.
- If people can't afford to pay for a campsite, are they really going to contribute to the economy?
- One submitter estimated that freedom campers contribute approximately \$56 for 16 guest nights (i.e. a small contribution in relation to the cost of providing for them). Another said they only buy a few groceries.
- Taranaki / New Plymouth already provides so many free tourist attractions, so tourists do not contribute a large amount to the local economy, so accommodation must not be given away.

Non-self-contained freedom campers should be required to use campsites / private accommodation providers:

- Campgrounds are very reasonable considering the facilities that campers have access to (ablutions, kitchens, recreational rooms, security).
- Campsites are emptier.
- In effect NPDC already has non-self-contained camping areas: the campgrounds that NPDC owns and leases out. If campers really want to visit New Plymouth and are the type of person that the community wants to see, then they should be willing to pay for a campground.
- Hope the council does not turn its back on campsite operators who employ staff, buy locally, sponsor community groups in the district.
- For Council to set up sites for non-self-contained campers would be in direct competition with the private sector.

Other comments:

- Annoyance at the Government for allowing freedom camping in New Zealand.
- See Christchurch as a district that discovered the consequences of providing facilities for non-self-contained freedom camping.

- Recently, 78% of tourism operators in New Zealand voted that freedom camping is overall negative to New Zealand's tourism industry (e.g. tourist guides, scenic areas – and they are affected most by freedom camping).

Against self-contained only freedom camping

Non-self-contained campers should be allowed:

- Should be allowed to responsibly enjoy the natural environment / be close to nature
- Having a small camp fire on the beach on a summer night is a kiwi tradition and should be allowed if controlled and not causing a nuisance.
- Short-term, overnight camping is part of New Zealand culture and must be preserved for the future.
- Freedom campers deter other weekend 'hoons' from the spots you are proposing to prohibit freedom camping from.
- Freedom campers aren't responsible for the litter – which is mostly bottles and food wrappers.
- Banning non-self-contained will not improve access to areas, as they can still park in these spots all day then just move to non-council controlled land to sleep (e.g. supermarket carparks).
- Punishing the majority for an irresponsible few.
- Just because one is self-contained, it doesn't mean they will act responsibly.
- Need dedicated parking for non-self-contained camping with toilets and water.
- Non-self-contained campers are not going away and not going to stay in campgrounds, so need to provide for them.
- The single non-self-contained Department of Conservation campsite is not enough for freedom campers.
- If non-self-contained campers were provided for there would be a reduction in the perceived negative problems associated with them.

Should welcome tourists

- Banning non-self-contained campers will deter tourists – should be encouraging tourism, not banning it.
- Stop using Pakeha law to stop visitors from using our beautiful shores.
- As guardians we must show guests the respect they deserve.
- Freedom campers want to enjoy the outdoors and be able to move freely between attractions.
- Freedom campers pay road user charges, fuel tax, income tax and contribute to the local economy.
- Non-self-contained campers have very little storage space, so have to buy supplies on nearly a daily basis meaning they are putting money into the economy.
- Non-self-contained cannot afford \$20 - \$40 per night (campsites), but they will spend money in our towns.
- Young freedom campers do spend money in the district.
- Accommodate non-self-contained campers so they leave the district smiling, and return on a bigger budget next time.

- Think very carefully about the restrictions you put in place, you may end up biting the hand that feeds you. Too many restrictions can have far reaching detrimental repercussions.

Concern that non-self contained will be pushed to nearby districts

- Concern that prohibiting non-self-contained campers may impact on surrounding districts. Spillover effect – those prohibited from New Plymouth District will spill over into neighbouring areas (resulting in higher demand on infrastructure and resources) – in particular coastal area of Taranaki along Surf Highway 45
- Banning non-self-contained will result in them hiding in areas where there are no ablutions and using the environment instead – becoming ‘feral’.
- There are no visible boundaries between Taranaki districts, therefore a regional approach to freedom camping is important.

Comments in relation to affordability of self-contained freedom camping.

- Marginalised people may never own self-contained campervans – the proposed bylaw is elitist.
- Your proposal will make freedom camping unaffordable for many domestic and international travellers.
- Do not destroy the soul of New Zealand by restricting freedom camping to the wealthy class (by banning NSC).

One submitter questioned the legality of the proposed bylaw:

- Restricting to self-contained only effectively bans “tent or other temporary structure, a car, some caravans, some households and all other motor vehicles” and bylaws must not absolutely prohibit freedom camping – therefore, your bylaw is illegal and some limited provisions near public toilets are needed.

Concern over restrictions to SCV freedom camping

- Freedom campers bring much needed tourist dollars into the local economy.
- Proposed approach is backward thinking rather than forward thinking.
- Will get a reputation for being non-motorhome and camping friendly. Once it is known that NPDC is opposed to Freedom camping freedom campers will not visit the district.
- One submitter noted that they have seen 50 plus camping vehicles parked in various locations around New Plymouth, so why is Council only allowing half of this number of carparks and where will the overflow park? They will not use motorcamps as they are too expensive.
- To prohibit freedom camping would mean self-contained motor homes would think twice before visiting New Plymouth.
- We frequent New Plymouth in our motorhome, but this may change if the choice of areas we can camp is taken away.
- By allowing only 22 places region wide, the 4 areas near New Plymouth where freedom camping will be allowed will be overflowed with people and vehicles, looking for a place to stay.
- 16 parks is not encouraging freedom campers to New Plymouth.

- The proposed bylaw does not make NPDC a motorhome friendly town –only 16 carparks allocated in the whole of New Plymouth district is ludicrous.
- Numbers proposed for camping areas are too low. You will drive tourists away from the district.

Suggestions for accommodating non-self-contained campers

- Limited provisions nearby public toilets, so the Freedom Camping Bylaw is not illegal.
- A site in the middle of the racecourse.
- The licenced camping grounds in the district.
- Toilet facilities on Council managed land.
- User pays coin operated shower facilities and potentially some permanent gas barbecues (like on the gold coast).
- Non-self-contained should be provided for through a regional approach.

Additionally, some submitters thought that the Council and campground operators could work to accommodate non-self-contained freedom campers for mutual benefit:

- Campgrounds could offer a reduced rate for these type of campers (\$10 - \$15 per night).
- NPDC could subsidise / incentivise campsites for offering subsidised rates to self-contained campers who don't use the facilities.

Similarly, submitters noted that pay-to-stay options and investment in infrastructure may be needed.

- Council should set up and manage a specific site for non-self-contained – e.g. as they do for NZMCA where there is a charge for usage of toilets and water supply. Site would need monitoring, and fee collection. An authorised officer to monitor the site as do Honorary officers for fisheries and hunting.
- A cheap 'pay to stay' option needed for self-contained (\$3 to \$8 per night) – would prefer to park in a dedicated carpark with a small fee in a safe environment.
- Infrastructure
 - o Investment in additional infrastructure is required if Council wishes to accommodate non-self-contained freedom campers (including rubbish bins, permanent gas barbecues).
 - o Council needs to review the district's toilets and waste receptacles to meet the demand of freedom campers and locals, so they can enjoy this beautiful place without leaving a mess.
 - o Council needs to address some carparks before allow camping (e.g. Ahu Ahu Road – abysmal state).
 - o Will need to increase frequency of toilet cleaning at various sites depending on the final decisions.

Additional feedback:

Less restrictions for self-contained freedom camping:

- Make as many parks as possible available to self-contained vehicles – owners or renters of certified self-contained vehicles have demonstrated that they are responsible people.
- Self-contained campers should be able to park anywhere overnight.
- The proposed prohibited areas seems over the top – have not seen problems from self-contained campers.
- Totally disagree with proposal to ban all freedom camping from all beach fronts (particularly Waiwhakaiho River Mouth, Corbett Park and Ahu Ahu Road and Weld Road – against the surfing and white-baiting culture of camping overnight to get an early start.
- Council should be looking to accommodate and benefit from increasing number of freedom campers rather than limiting, prohibiting and potentially fining them – consider the cost of turning away self-contained freedom campers.
- Your proposed bylaw will result in us (campers) no longer having anywhere to safely park overnight.
- Do not need to ban / restrict freedom camping to a few areas, simply put in more toilets and outdoor showers and have clear rules that are policed properly (e.g. maximum number of nights, remove rubbish).
- To prohibit is detrimental to (especially) our youth – freedom camping is character building.
- There are no allocated spaces south of New Plymouth city.
- Two submitters questioned the site assessment data and rationale for prohibiting freedom camping at the various sites. It was noted that decisions need to be appropriate and proportionate to the perceived problem:
 - o Site assessments refer to waste and human waste disposal as a reason to prohibit freedom camping – if non-self-contained camping is banned, then presumably camping could just be restricted to self-contained vehicles
 - o One submitter guessed that Council had not carried out a site by site assessment or ground examination that would deliver empirical evidence that areas need protecting.

Comments relating to regulation / monitoring / enforcement of the bylaw:

- Support prosecuting those who litter, defecate on council land – bylaw needs to be enforced.
- Severe fines are the only way to regulate freedom camping.
- Enforce the bylaw when need be.
- The camping sites should be metered, monitored and signposted with Council contact for complaints.
- What happens to those that are non-compliant? Are they just moved onto next area to become someone else's problem?
- Policing of NSC to stop them abusing our recreational areas is needed – we have commercial campgrounds for these people.
- Community wardens should be brought back to monitor the freedom camping sites
- Collection of fines is fraught with difficulty – non regulation vehicle offenders commonly leave the country.
- No designated carparks required –

- Just a sign saying how many vehicles can stay – campers don't want to park like cars.
- Designated car parks are too restrictive.
- Confusing – can you park outside of these parking spaces during the day
- Campers don't want to be put in the back corner of the carpark.
- Provide clear rules for parking that address the real problems, but allow maximum flexibility.
- Correct signage is very important (saves visitors being harassed by locals / shows they are allowed to park in these areas).

A number of submitters commented on the size and number of the designated car parks.

- Places for designated car parks are too small to fit campervans.
- Parking spaces need to be longer than 6m.
- Spaces need to be at least 6m wide and 16m long (one submitter noted that campervans are up to 2.45m wide).
- The defined car parks would only allow for 1m between vehicles (dangerous in event of a fire or an LPG explosion) – good practice is 3m between vehicles carrying LPG cylinders.
- Clause 5(1)(d) needs to allow for gas appliances fitted to vehicles.
- Limit number of campers during the day when the car parks are being used, but allow them to park in the evenings.
- The designated parking spaces should not be made any bigger or placed intermittently with regular parking spaces, as our parking areas should not become campgrounds and these campers should not interfere negatively with public use for the space – they are car parks after all. Submitter recommends amending section 5, clause 1a to read: *'must be parked legally, remaining within the defined parking lines at all times'*.

Some submitters provided suggestions on the approach that Council could take in restricting freedom camping:

- Self-contained campers should be permitted anywhere, so long as they are not causing a nuisance, but specify where non-self-contained can camp, and limit numbers if required.
- Designate six car parks at sites, as campers often travel in groups.
- Consider changing restrictions to time restrictions / seasonal restrictions (rather than blanket ban).
- Should be additional sites for parking self-contained vehicles outside of daylight hours (where they don't restrict public).
- One submitter asked to leave the rules as they are.
- Freedom camping should not be allowed in central areas e.g. near motor camps or popular beaches. Should be further out in remote areas.
- One submitter was supportive of allowing non-self-contained campers, but noted that setting up a specific site for non-self-contained was a complete contradiction, and a waste of money (a dedicated site is not freedom camping). Freedom campers do not want to be in a designated area – that defeats the purpose of freedom camping.
- A working party with Council and NZMCA representative should investigate options available in the district.

- Length of stay – the 30 day return period could easily be reduced to ten days, which would encourage turnover, but still allow full enjoyment of our district.

Impact on tourism and the economy

- Why are you restricting camping rather than promoting this city as the **MUST PLACE TO VISIT**?
- Stop being so precious and share the world.
- Do not want to turn our backs on tourism market through restrictive policies.
- Proposed bylaw is unwelcoming to prospective domestic and international visitors, and to local campervanners.
- Freedom camping promotes cross cultural interaction.
- Word of mouth on good experiences is a very strong good press tool.
- Council's Blueprint Key Directions (Annual report 2015-2016) states: *become a world-class destination, using both natural and man-made attractions, will create employment and tourism opportunities as well as acting as a lightning rod for attracting new businesses and talent to New Plymouth*". In addition, Taranaki has been promoted as the second best region in the world to visit – does the proposed bylaw promote and fulfil these visions?
- Educate rather than prohibit – freedom camping should be encouraged in a safe and sustainable way.
- If there are no sites for freedom camping tourists may have to travel when tired and they shouldn't be driving (e.g. when travelling south from Tongaporutu).
- We have all suffered from downturn in oil and gas, let's promote the region and maximise on tourism opportunities.
- Freedom campers bring wallets and have social media followers #Taranaki
- Let's maximise on Lonely Planet status, be friendly and people will spend their money here rather than down the line.
- Provide for both self-contained and non-self-contained and their different needs – they both bring money into the community.
- Each parking space for a freedom camping represents approximately \$140 spend per day in the area.
- Potential 120,000 visitors available (NZMCA members) that NPDC needs to get their fair share of.
- The proposed bylaw makes freedom camping appear to be a problem to solve, rather than an opportunity to take advantage of.

Comments in regard to freedom camping sites near campgrounds:

- To prohibit freedom camping near campgrounds is short-sighted – higher freedom camping numbers results in more business for campgrounds, as freedom campers have to stay to use campgrounds facilities such as washing, showers, power and water.
- The bylaw appears to protect the existing commercial campsite operators in the district. As NPDC is the owner of most of these campsites it may be construed that the council is protecting its own and its lessee's interests – this could be a conflict of interest.

- Campgrounds pay rent and have KPIs to meet, providing free camping places undermines this.
- It is also unfair that council owned camps should expect their tenants to pay premium rates, whilst free campers can park a few hundred metres down the road.
- NPDC should support the campground operators through the introduction of the freedom camping bylaw.

Against allowing freedom campers:

- It is detracting to see so many freedom campers along our waterfronts, parks etc.
- We shouldn't be selling our souls to tourists.
- Stop all freedom camping in our special areas, we are not here for a free ride.
- Freedom campers drain resources and abuse our facilities (washing laundry / dishes in public places).

How a freedom camping bylaw may impact the community

- A special attribute of Taranaki is the coastline, retaining access to these locations to be enjoyed and not negatively affecting the enjoyment of others needs to be a priority
- Need to balance the promotion of Taranaki as a tourist destination with the lifestyle / needs of the Taranaki community (attracting tourists versus favourite recreation spots being overrun with visitors).
- The issues caused by freedom campers means that some disadvantage / restrictions to certain local groups (such as surfers, whitebaiters) is inevitable.
- Reason we invest in the district to attract visitors is because if they come, they will (hopefully) contribute more than it has cost us to host them – Council need to decide what level of cost recovery they want to seek from our visitors.

Other general comments received:

- Would be happy to do volunteer tidy duties / clean ups
- The painted parking spaces at Waiwhakaiho mean there is room for everyone now
- Parking spaces close to the city are appreciated for easy access to the CBD, as there is a lack of parking for large vehicles in CBD.
- The whole issue of freedom camping needs to be considered alongside New Zealand's increasing homeless population
- The number of complaints reported by Council was incorrect, and actual viable complaints were less than ten.
- Council should identify which of the three reasons (protect: health and safety, the area, access to the area) applies for each location that camping is prohibited from. This will ensure decisions are based on facts.
- Other areas in Central North Island have better places for camping than Taranaki
- Campers often park side on to the parking spaces, taking up 2-3 spaces.
- Napier is a good example to follow – a carpark with a toilet and dump station – Nelson, Hawkes Bay, Southland, West Coast, and Lumsden also mentioned as good examples
- Campers have been seen disposing of their effluent at the animal effluent dump on SH3 at Ahititi, the Clifton Community Board recommend investigation into human effluent dump station at this site.

- Freedom camping should be addressed by central government, and should be consistent nationally.
- Queenstown Lakes District prohibit freedom camping in urban areas.

Thames Coromandel make visitors welcome by providing double length carparks with campervan stencil