



5 October 2022

Committee Secretariat  
Economic Development, Science and Innovation Committee  
Parliament Buildings  
Wellington

Submitted electronically via: [New Zealand Parliament website](#)

Kei te rangatira, tēnā koe

Central Otago District Council thank you for the opportunity to submit on the Self-contained Motor Vehicles Legislation Bill.

Council is pleased to see feedback made through the Responsible Camping process has been considered through the bill.

Council is generally supportive of the overall direction of the Bill and the measures contained within. Council supports measures that address behaviour, including Camping Ambassadors. These national initiatives must be ongoing to continually manage the issue.

Council support the regulatory system for certifying self-contained vehicles; and the requirement for self-contained vehicles to have a fixed toilet.

Council seeks further amendments to the bill to achieve greater consistency nationally in managing freedom camping, and to reduce the cost burden on individual councils. These measures include:

- Council recommend the funding challenges for smaller local authorities, and how these are managed on land managed by crown agencies, be brought into scope and addressed before finalisation of the Bill. CODC recommend funding approaches be developed using a district, regional, and national lens to ensure costs are spread appropriately.
- Council seek to work in partnership with crown agencies to proactively manage responsible camping in the district by the provision of sites and infrastructure for compliant vehicles. This will require a funding mechanism for the provision of infrastructure and to enable responsible camping at appropriate sites. Non-compliance can be addressed through the enforcement measures laid out in the bill.

- Council recommend Central Government to assist in the considerable legal cost of drafting a bylaw through the provision of a standard bylaw that can be adapted by individual councils.
- Council recommend a standardised signage scheme is developed to provide clarity to campers.

#### Funding challenges, including provisions relating to crown agencies

Council is generally supportive of the ability for councils to have a requirement for freedom campers staying in a vehicle on land managed by a local authority to use a certified contained vehicle.

There are aspects of the enforcement structure that will have a disproportionate negative impact in Central Otago. This is due to the following factors:

- Central Otago's low population relative to the geographical size, and the attractiveness of the district as a destination for camping.
- Central Otago's proximity to Queenstown Lakes, where significant enforcement is likely to be taken.
- Crown agencies have ownership of a significant portion of the popular motor vehicle camping sites in the Central Otago district, with no funding mechanism.

The current enforcement structure includes a series of district-funded approaches to manage a regional and national issue.

The potential for funding pressure on territorial authorities is discussed within the Bill and accompanying resources, including the Regulatory Impact Statement. The Statement frames a situation where local authorities who 'choose' not to manage freedom camping through a bylaw 'may not welcome' the new approach. This position does not fully appreciate the practical application in the Central Otago district.

Central Otago is the fourth largest district in New Zealand by area, with just 14,569 ratepayers covering 9,968km<sup>2</sup>. This ratio presents significant financial difficulties – as an example, the salary cost alone for one additional enforcement officer would add an additional \$3.77 per ratepayer (before calculating mileage, training, and other expenses).

Central Otago prioritise financial resources toward the greatest need. Responsible camping has been successfully managed at a lower cost through a 'destination management' approach. Responsible camping is welcome, with an emphasis on educating campers and providing appropriate areas and facilities for camping. The number of concerns raised by the public has been significantly reduced through these initiatives, funded through both rates and the Responsible Camping Fund.

Many of the popular camping spots in Central Otago are on crown land, including land managed by Land Information New Zealand and the Department of Conservation. Demand

for camping sites regularly exceeds availability from commercial providers. The responsible camping sites prevent displacement of visitors, attract other visitors to the area, and provide safe, affordable, and attractive recreational activities. They are also vital to the economy, converting vehicles travelling through the district into overnight visitors with an auxiliary spend and providing for seasonal workers.

The crown agencies do not have any funding mechanism to provide facilities for campers – Central Otago District Council has provided funding to enable the sites to remain viable.

Without a funding mechanism there is a very real risk of these facilities closing, pushing vehicles into streets and parks. If this were to occur, the small ratepaying base will be responsible for the cost of managing the effects of visitors both from within New Zealand and overseas, and lose many associated benefits. Put another way, the small ratepayer base will be carrying the cost of New Zealand's tourism industry.

Central Otago neighbours Queenstown Lakes District, an area with both a relatively high level of demand for freedom camping, and a low level of social tolerance. Significant compliance issues have been reported by the Queenstown Lakes District Council and high levels of enforcement are likely. It is also likely that these vehicles will travel to neighbouring areas – significantly increasing the enforcement burden for Central Otago. It is likely that Central Otago will receive an increase in motor vehicle camping overall, and an increase in non-compliant motor vehicle camping.

Council has concerns about cost recovery from international visitors, particularly with changes reducing the ability to pass fines direct to hire companies, making them liable for recovering these from their clients.

Council urges that these funding concerns be brought into scope and considered, including providing mechanisms for crown agencies to fund infrastructure to provide sites for freedom camping.

#### Extending the infringement regime to other Crown land

There are practical considerations to work through to further develop the extension of the infringement regime to other crown land, including consistency across the types of crown land, complexities in the bylaw process, and issues with liability.

Although Council's may choose to enforce freedom camping regulations on crown land, particularly if the fine structure provides a financial incentive, there is no obligation for them to do so. The legislation must enable crown agencies to sufficiently fund and administer their sites.

Council urge further discussion with the Local Government sector to resolve these concerns.

#### Standard bylaw and signage

There are significant costs in the creation of a bylaw. Recognising provisions are in place to assist with funding these, Council recommend the creation of a standard bylaw that can be adapted by each Council as an efficient and financially prudent approach.

Council also recommend a standardised signage system is developed to assist in communication across the numerous territorial areas and provide clarity to visitors.

Ngā manaakitanga



Alix Crosbie  
Senior Strategy Advisor  
Central Otago District Council