

1. QLDC STANCE

I believe that QLDC does not have a mandate from the ratepayers to support Freedom Camping as it has been doing. Asked directly if there should be Freedom Camping in the District, I believe that the majority of ratepayers would respond with a clear 'No'.

Camping is a great NZ activity and, while the increase in tourism proved historical laws to be inadequate, the replacement law has resulted in an even worse situation.

Having Freedom Camping occur close to the various communities that make up Queenstown is detrimental to those communities. The QLDC should lobby the Government to change the law so that Freedom Camping is able to be banned by local authorities should they wish to do so.

Given strong leadership on the matter, I believe that other communities will readily support this stance. For those communities where the benefits override the detrimental impacts, they have the choice to allow Freedom Camping. Queenstown Lakes is not one of those communities.

While Tourism NZ may support the current law, it is being consistently lobbied by camper van companies and other tourism operators whose primary focus is to make money for their companies. It is not to look after the local communities. QLDC's primary focus is to look after its communities. Tourism will continue to thrive as it did before the implementation of the current law.

2. IMPACTS

Due to the detrimental impact that they have on the environment and on the areas provided for use by non-camping locals and visitors (mainly reserves & adjoining trails), campers should sleep/live in specific locations ie camping grounds.

Campers change the nature of the reserves & adjoining trails. They are treating the areas as their accommodation or 'home' and therefore they remain there for longer periods and in larger numbers than non-campers do.

Allowing Freedom Campers to occupy reserves impacts on non-campers in ways such as: no or limited parking available; increased litter; campers shaving, washing, dressing, cleaning teeth, toileting in the surrounds, occupying car parks for cooking, eating meals & socialising; occupying public toilets for extended periods while cleaning teeth, washing hair in the basins etc. Large numbers of campers with their vehicles near trails is not conducive to the security of trail, users including school children.

3. Management

The impacts above have not been managed to date by QLDC and are impossible to manage unless campers are in a specific area established for the purpose of accommodation.

The cost to the community of trying to manage the current situation is grossly unfair on the ratepayers.

4. Solution

A ban on Freedom Camping in and around Queenstown is the only option and QLDC must lobby the Government to achieve this on behalf of its ratepayers.

Campers should be catered for within Camping Grounds, the nature of which limits the impact on the environment and others.

In order to provide areas for this type of accommodation, the campers should be charged a fee as is done for other levels of tourist accommodation and holidaying New Zealanders eg motel & hotel users. Camper vans with toilet facilities could pay less and be accommodated in an area with no ablution blocks, but this detail can be managed within an appropriate environment – which is not the public reserves.

Feedback on freedom camping, QLDC

Dear Mayor Boulton and Councillors,

Thank you for the opportunity to give feedback as you look to how to best deal with freedom camping in this district. Not an easy task, considering the legislative constraints and political ramifications.

Upfront disclosure: John and I are the proud owners of a new fully self-contained camper, in which I am now sitting with my voice activated laptop writing this submission, with a view of the Lake Hayes freedom camping area in front of me. We have spent a couple of days here - among the so called "pooley" people, in the interests of research and a pleasant camping experience :-).

We also freedom camped our way around the States, Canada and Mexico for one and a half years, 20 odd years ago, in the back of a converted Chev Suburban. So we probably cover the gamut in terms of freedom camping types - younger travellers seeking "real experience" of natural environments on the cheap, and grey nomads looking to experience our own country from the comfort of a mobile crib. We have never left a place we have stayed worse for our visit.

From this background, I feel closing Lake Hayes completely to freedom campers was a precipitous move in response to social media pressure. I was reassured to read that Thunes Cloete is pushing to have a districtwide review over the next six months. This will hopefully allow more evidence and less emotion to be applied, to create a sound and comprehensive freedom camping policy framework for Queenstown Lakes District Council.

From reading both mainstream and social media, it would appear there are two main concerns:

- Public outcry because of the perceived effects of freedom campers on the environment and locals' use of the reserves.
- The perception that some people are freeloading, at the expense of locals.

From my understanding, there are several basic parameters within which council can act to meet these concerns;

- The genie is already out of the bottle in terms of freedom camping. New Zealand Motor Caravan Association now has 80,000 self-contained vehicle owning members. According to Stuff's tourism writer Amanda Cropp, last year there were some 118,000 van tourists in NZ. Changes to marketing, recreation habits, fuel prices, self-contained vehicle definitions and legislation et cetera might change numbers a bit, but freedom camping will remain part of our cultural and physical landscape. That means we must look to ways to control and manage the issues so that benefits (tourism, enjoyment of NZ's great environment, continuation of NZ cultural traditions et cetera) are maximised and damage (environmental, impingement on local enjoyment/property et cetera) minimised.

- We can't legally ban freedom camping in the district.
- There is a lax legal description of "self-contained vehicle."
- Central government legislation restricts how local authorities can deal with freedom campers.

On the latter two fronts, I support council's lobbying efforts to strengthen the self-contained vehicle definition (so that users must have access to their toilet at all times) and strengthen council's ability to best manage freedom camping for the local environment and community.

Achieving progress on these two fronts could take longer, however, than the community wants to wait and there are moves council can make more quickly - including strengthening its own bylaw definition of self-contained vehicles.

Before I move on to these, I would like to urge council to first seek evidence of the alleged problems. I totally understand people being peeved when they see poo, paper and rubbish littering our reserves and freedom campers exiting the bushes having dropped their load. This kind of behaviour is damaging, unacceptable and disrespectful - from freedom campers or anyone else. I'm not denying this occasionally occurs, but freedom campers aren't the only culprits.

I specifically asked Lee Webster if there was any evidence linking freedom camping at Lake Hayes or elsewhere to degradation of the water. He said there wasn't. Furthermore, you will have seen recent media coverage (The Mirror, February 14, page 5) identifying that ducks were the cause of E. coli contamination in Lake Dunstan, not the nearby Bendigo freedom camping site as originally alleged. You will note a lot of ducks and swans on Lake Hayes.

And in the ODT, again this week, a story about the closure of Lake Hayes to recreational swimming because of cyanobacterial scums, caused by our intense summer, temperature stratification and an abundance of nutrients.

Furthermore, eutrophication caused by this abundance of nutrients from surrounding properties has been a problem for decades. It is this that has caused the murky green muck that bedevils Lake Hayes, by far the greater ecological degradation impacting on the lake, and it would be great to see the same passion, speed and commitment from community, council and ORC to dealing with its primary causes as we have seen with freedom camping.



Lake Hayes' murky water, caused by eutrophication, at the Rutherford Rd reserve end.



Scum visible on Lake Hayes' surface, from the track's northern side.

In terms of perceived freeloading, freedom camping has long been part of New Zealand's culture and it would be sad to see this opportunity lost for responsible freedom campers through prohibitive responses to a problem caused by a minority of freedom campers and many unrelated factors (e.g. eutrophication).

Many tourists pay a significant amount to hire fully compliant self-contained vehicles as a result of New Zealand Tourism PR encouraging this approach to travel. For instance, our German exchange daughter rented a basic Jucy van, with a toilet they could not practically use, for 20 days last month for €2100. That is around \$NZ170 a day. Asking such travellers to then pay the nightly rates we charge at the council campgrounds in Queenstown (\$60), Frankton (\$50 a couple) and Arrowtown (\$42) is not a realistic option.

Mayor Boulton has suggested that only 10% of freedom campers cause the problem. Observing freedom campers at Lake Hayes, and speaking to the wardens at 12 Mile and Moke Lake, I would suggest this figure was 5% or less. Where else do we ban the 95% of "good" operators from an activity because of the 5% dickheads?

What's more, we make it difficult for people to be responsible freedom campers. For instance, at Lake Hayes, we fence them off from the only toilets and provide no rubbish facility. If they then go to the dump station at BP in Frankton to try and be responsible campers, there is nowhere to put their rubbish or recycling. No drop off facilities are provided in the CBD or Frankton retail centres either.

From my understanding, Council cannot ban freedom camping in the district under current legislation. I question whether we would want to anyway. Although it is currently getting a bad rap, with some justification, it remains a valuable source of tourist dollars and a valid way to travel if done with respect. The difference, as media now so labels, is between freedom camping and careless camping.

If this is the case, then the question becomes how to allow/control freedom camping to maximise the benefits (to tourism business, the community and visitors) while minimising the negatives (to the same groups and the environment)?

Suggestions

Enable freedom campers to be responsible

Ensure that rubbish and recycling facilities are clearly available and easily accessible. This works well in Wanaka - where rubbish and recycling bins are provided at the dump station, immediately adjacent to the central campground. This excellent station provides room and easy access for large vehicles. Not so at the BP station in Frankton or the Cemetery Road station, where access is difficult, especially for cautious drivers who are often inexperienced with handling larger vehicles. Rubbish/recycling drop-off is also not available.

Perhaps Council could look at providing a similar, easily accessed facility at the Glenda Drive recycling and refuse station? Or near the Shotover poo ponds/dog pound? If we want to encourage responsible freedom camping, we need to be provide the opportunity to be responsible. Freedom campers can't drop their rubbish in Queenstown/Frankton retail area rubbish bins. Where are they meant to put it? Maybe it is time to look at providing rubbish/recycling bins at the most popular areas - understanding that costs of collection mean this will only happen where numbers and proximity to current collection routes justify.

We accept that people create rubbish and want to go to the loo at Queenstown Bay - there are six huge rubbish and recycling bins, public toilets plus two businesses with accessible toilets. No payment is required and most of the time, the people enjoying this great environment behave and are perceived positively.

Extending this acceptance to the rubbish and toilet requirements of freedom campers in specific areas around the district would enable more of them to be exemplary visitors.

Assess where and how freedom camping could best be allowed - and where it should not be.

There might be some places freedom camping should not be allowed, because of environmental or local community considerations. Others where it could be allowed only for those campervans with a permanently accessible and plumbed toilet. And some where other vehicles that meet the current definition of self-containment are also allowed. Council can design its Freedom Camping Bylaw to differentiate in this way across sites (see Appendix A).

This analysis should be based on both environmental and community considerations. So both objective data (environmental vulnerability, rubbish/toilet resources available, proximity to important local recreation areas et cetera) and subjective feedback (community discussion, focus groups, community associations et cetera) should be assessed.

I'm sure some work on this has already begun in the background. Perhaps it might identify commercial/retail car parks that could be used on a restricted hour basis (8 PM to 8 AM?), with (in future) access to toilets and perhaps coin-operated showers. This approach has been used elsewhere in New Zealand and overseas. This can be a good way to maximise usage of retail car parking and minimise environmental impact. Some of these might be temporary - reflecting current land availability, freedom camper numbers and legislation/definition of self-contained vehicles.

This assessment should also consider the problem of displacement. If 50-100 vans a night are not allowed to park at Lake Hayes, for example, they and their negative effects are likely to be exacerbated and spread further out around the district; i.e. a bigger impact, harder to clear up.

This also raises the question of whether the basic premise of the current system, where it is allowed outside of identified urban/settlement boundaries except where expressly banned, should be changed? If instead freedom camping were only allowed in specified areas - where effects could best be managed - this would reduce potential problems from people spreading out along rural roads (road safety, rubbish spread et cetera) and reserves/open spaces. This would also allow some level of local control in terms of numbers (through area allowed for freedom camping).

The review should also keep in mind basic practicalities such as connectivity (neither cell phone nor Internet coverage is available at 12 Mile or Moke Lake, for example, and many travellers and grey nomads still work from their campers), accessibility, road safety and the capacity of DOC and other basic camping sites to absorb the overflow.

Continue lobbying to change the definition of self-contained vehicles and increase councils' powers to control the same.

The definition of a self-contained vehicle should ensure campers have access to its toilet at all times - many currently don't. In most cases, a fixed toilet will always be accessible for use, while a cassette toilet is typically not accessible when the beds are set up.

This problem is exacerbated by the commercial power of rental companies marketing these vans as a cheap and easy way to get around New Zealand - and actively discouraging users from actually using their vans' cassette toilets. This will no doubt be a strong lobby group against any such change.

An alternative solution that might be easier to fight for would be to have a two-level definition, where campers without a fully accessible toilet are restricted to areas with toilets available. See Amanda Cropp's article: www.stuff.co.nz/business/87714815/inside-loo-rule-for-self-contained-camper-vans-and-motorhomes

QLDC could apply this differentiation within its own bylaw review, much more quickly than waiting for a change in national legislation.

And in terms of where power to legislate should be located, freedom camping should be controlled at the level at which the effects thereof are felt – i.e. local authorities.

Lobby via LGNZ and relevant ministers to change NZ Tourism message - and force vehicle rental companies to recover fines from renters.

Freedom camping and general tourist numbers are revealing creaking infrastructure and damaging environmental impact around the country. Perhaps it is time for NZ Tourism and vehicle rental companies to change their message, to ensure NZ gains good value from visitors as well as vice versa.

And if rental companies are going to profit from freedom campers, they should also be forced to recover fines from customers' credit cards when they have broken our laws/bylaws. None of them want to be the bad guys who do this - but if the government insists that all do, it is a level playing field and at least local authorities would get more of the infringement no you tice fines paid.

Lake Hayes.

Turning to this specific example, as this is the site that seems to have most upset people, we spent three days here over January and February and observed nearly everyone treating the site with respect. We saw a large number of vans labelled self-contained that were not being used as such, because the way the toilet was stored made it inaccessible much of the time. We saw some cars/vans without self-contained vehicle labels that were clearly flouting the bylaw. During several "site visits" into the primary area of concern under the Willows over the three days, we saw very little rubbish, no poos, and just a couple of pieces of toilet paper. It was certainly not the messy mayhem that I had expected from media and social media reports. Speaking to a man who does volunteer monitoring of the reserve (and works as a reserve maintenance contractor for council), he said it did seem to have improved since publicity on the problem had begun.

This photo taken at Lake Hayes shows a typical installation of a cassette toilet. It can only be accessed with the vehicle door open and can only be used if it is removed from its storage and placed somewhere else. This reduces its usefulness and means it is not available when the bed is made.



I would like to offer some alternative approaches to the total freedom camping ban being imposed this week. As it was labelled council's "initial response", I am assuming there is the possibility of it being changed going forward:

- Change the location of the freedom camping zone. The map at the reserve showed freedom camping was only allowed under the trees, on the lake side of the road. This is exactly where it shouldn't be allowed, as it's the primary area of both concern and problem. The freedom camping zone should be moved to the open area on the other side of Lake Hayes Reserve Road. Many campers already use this. This would keep freedom camping vans out of the main area of conflict (although they, like locals, could picnic under the trees by day, just not park there). It would also make it much less likely that people did poo in the area - squatting in the open is a less attractive option to most people. Similarly, rubbish is less likely to be left behind when you can only do so in open view of fellow campers and locals.
- Restrict its use to only self-contained vehicles with permanently plumbed and accessible toilets.
- Accept that even fully plumbed self-contained vehicle users will use public toilets, especially during the day, so that they don't have to keep emptying their poo tank. By fencing off the public toilets as has currently been done, Council has exacerbated the problem. In reality, having just two toilets for the extent and usage level of Lake Hayes reserve (even just by locals picnicking) is inadequate. Two more toilets should be provided at the eastern end.
- If possible, charge say \$5-10 per night per van to cover costs of this (acknowledging that locals and day visitors will also use the toilets, in terms of cost allocation). NZMCA and POP camping sites do this. So some licensing agreement might be an alternative, if Council can't do so under its own guise. Perhaps the same business that currently runs 12 Mile, Moke Lake and The Outlet camps? This charge could also pay to employ an on-site warden during the peak months, if numbers justified this.
- Continue with the two day/month limit to ensure turnover and that it doesn't become a de facto campground.
- Clamping is threatened - has it ever been used? The (strengthened) bylaw should be monitored and strictly enforced. Social media would get the message out quickly if we take our own rulings seriously.
- Limit numbers by limiting the area available. Its popularity would also decrease, I think, once the opportunity to park under the trees has been removed and the bylaw is being strictly enforced.

- Improve and simplify the signage. Use graphics rather than so many words. You have this talent already on staff! Screeds of legalese English doesn't get the message across. And most have already parked by the time they see the two signs, as they stroll to the distant toilet...
- Either provide rubbish bins or signal clearly where rubbish and recycling can be dropped off.

Lastly, on a broader Lake Hayes front, I would like to raise the question of council's plans for the extensive reserve land holdings at the lake?

The other side of the eastern reserve, over Mill Creek and accessed by Rutherford Road, is very little used. The lake frontage has been nicely landscaped. I am sure the owners of the two or three houses that look out onto this extensive and little peopled reserve love the view and would wish to retain it. However, is that its best use in terms of "public good"?



Rutherford Rd end of Lake Hayes Reserve – extensive space, largely unpeopled most of the time.

There is also substantial public reserve land on the southern side of Lake Hayes - the Bendemeer Reserve plus the extensive reserve recently added around the Showgrounds. I note also that there has been substantial clearance of vegetation at the western end, adjacent to the walkway, though I am unsure if this is on private or public land?

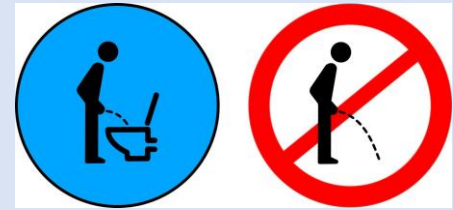
I submit that Council should look at all these holdings in terms of

- long-term recreational, environmental and visual resource requirements for our local community
- environmental buffering, mitigation and protection for the lake
- and potential for providing well monitored, adequately resourced and attractive freedom camping for locals, New Zealand and overseas tourists within a

Existing signage is rarely read and ineffective.



Simple visual signs clearly displayed would be more effective.



comprehensive plan for the district. Perhaps one of these other sites might be better for freedom camping?

Freedom campers will no doubt continue to be an emotive subject, on which Council cannot please everyone. Some seem to think they're a scourge that should be wiped from the face of the earth. That's not a practical option. But perhaps numbers will decrease rather than continue exponentially growing, in response to changes in tourism PR, self-contained vehicle definition (and thus diminishment of cheap vans to rent/buy) and so on – if lobbying is successful.

Now is a great opportunity to look at the subject broadly and objectively, in terms of where a reasonable level of freedom camping provision can be achieved with best protection for locals and our environment.

There will no doubt be areas within QLD that are better suited and able to absorb freedom camping than others. Such analysis might rule out Lake Hayes; on the other hand, good planning might equally make it an ideal spot to manage effects and give campers a great experience.

Wanaka Chamber of Commerce's proposed campaign (ODT, 6/2/18) to counter the negative effects of tourism through engendering greater respect for the community from visitors is one that would be well worth emulating in this arena too.

Thank you for your work to create a better system.

Kind regards

Cath Gilmour and John Hilhorst

Appendix A

Emailed information from James Imlach, national policy and planning manager for New Zealand Motor Caravan Association:

Local authorities are empowered to define 'self-containment vehicle' in their bylaws as they see fit and most (if not all) refer to the Standard in some way. For example QLDC states:

Self-contained vehicle means a vehicle designed and built for the purpose of camping which has the capability of meeting the ablutionary and sanitary needs of occupants of that vehicle for a minimum of three days without requiring any external services or discharging any waste and is certified that it complies with New Zealand Standard 5465:2001.

If QLDC finds it necessary to further restrict freedom camping in certain areas to certified vehicles with fixed toilets only then it will require an additional definition to rely on in the bylaw, for example

Fixed toilet means a cassette toilet or permanent fixed toilet as defined under NZS 5465:2001 and excludes a portable toilet.

Note: A self-containment certificate denotes whether a vehicle has a portable or fixed toilet. NZS 5465:2001 requires a copy of this certificate to be kept inside the vehicle at all times. Enforcement officers may then request a copy of this certificate to help verify compliance.

The bylaw would then state for particular areas that freedom camping is restricted to self-contained vehicles with fixed toilets only. Enforcement officers would then be able to request a copy of the certificate if they're in doubt, check the toilet type noted on the certificate, and move on people/issue an infringement notice if the toilet type is portable. Because of the limited search powers, enforcement officers are unable to simply look inside the vehicle and make a judgement call on whether the vehicle has a fixed or portable toilet. It's best to rely on what the Standard provides to avoid confusion and potential challenges.

ENDS



Queenstown Lakes District Council
10 Gorge Road
Queenstown 9300

Friday 16 February 2018

Destination Queenstown
Level 1, 50 Stanley Street
Queenstown 9300

Re: Freedom Camping

To whom it may concern,

Destination Queenstown supports Queenstown Lakes District Council's upcoming review of freedom camping by-laws. DQ supports the tightening up of bylaws or a total ban on freedom camping in public spaces.

Destination Queenstown's role is to position Queenstown as the Southern Hemisphere's premier four season lake and alpine resort. This approach means that Queenstown should be seen to offer a premium experiences for all styles of visitor, it is not the goal to give the impression that Queenstown is an exclusive destination.

Queenstown needs a welcoming and supportive local community for visitors and the impacts of negative freedom camping is currently placing this at risk.

The visibility of careless freedom campers and their behaviour in public spaces such as Lake Hayes Reserve and the Shotover Delta is not consistent with our premium image.

Destination Queenstown doesn't believe that locations designated for freedom camping should be adjacent to the towns or residential areas within the district, nor do they need to be at some of the most desirable recreational areas, for both visitors and residents, adjacent to lakes and rivers in the Queenstown region.

Destination Queenstown believes that making places available such as at the Twelve Mile Delta Department of Conservation camp (at a nightly cost of around \$13per adult) is appropriate.

Freedom camping zones well outside of resident boundaries or areas is the norm and this approach is perfectly acceptable for the Queenstown Lakes district, providing freedom camping facilities to those who wish to use them while retaining the natural wonder of the region for all visitors and residents to enjoy.

We support freedom camping being restricted to truly self-contained vehicles and support the contention that the definition of self-contained should be strictly confined to vehicles with facilities that are able to be used within vehicles.

Destination Queenstown

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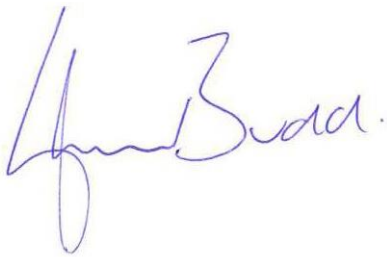
queenstownNZ.nz

The only facility a truly 'self-contained' vehicle needs to camp outside of camping grounds or holiday parks is are suitable dump stations and cold potable water.

Once suitable locations and regulations are established we support the necessity to enforce these with investment in staff and other means to properly police compliance.

Please do not hesitate to contact Destination Queenstown on (03) 441 0700 to discuss any of these points further.

Kind Regards,

A handwritten signature in blue ink, reading "Graham Budd".

Graham Budd
Chief Executive Officer
Destination Queenstown

Destination Queenstown
PO Box 353, Queenstown 9348, New Zealand
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-----Original Message-----

Sent: Thursday, 22 February 2018 11:37 AM

To: "qldc council" <services@qldc.govt.nz>

Subject: Freedom camping feedback form!

The Irony .

The Irony of reading in the Radio New Zealand web site that QLDC complained that the submission period for the Governments Ban of Foreign ownership of property fell over the Holiday period, to find that the feedback form for the QLDC recommendations for Freedom campers also fell over the holiday period!!

SO I have been told I can email someone and give my feedback.

The difficulty in turning away the people that come to freedom came in QT and Kingston and Wanaka is that we have spent the last 15 years inviting them through Destination Queenstown and Tourism New Zealand, so now they are here! Time to Accommodate them.

So we need to have dedicated freedom camping areas with toilets and rubbish pickups. these need to be all around the areas of the the lakes district . Make more toilets and rubbish pick ups its no so difficult .

I know we down sized the camp ground in town and the Arthur's Point camp is much smaller that it was 10 years ago, and Franktons camp is non existent, but the Camper van net work has grown dramatically and QLDC is behind the times.

More facilities that are not DOC campsites, maybe they will be on Reserve Sites?

There are sites all along the lake that campers go to every day (by the way so do rate payers and other New Zealanders) and there are no toilets there? Time to get it sorted, its something that everyone does everyday (go to the toilet).

Love to hear from you on what the next process will be.

Wayne Allen