

Submitters to be heard

Submission ID	Tell us what you think about the new proposed changes to the bylaw	Name	Name of organisation	Your role within organisation
40390	Submission attached	Ann Kennedy	Avon Heathcote Estuary Ihutai Trust Board	Trust Board Member
40407	<p>INTRODUCTION</p> <p>The Te Pātaka o Rākaihautū/Banks Peninsula Community Board (the “Board”) appreciates the opportunity to provide a submission on the Proposed Replacement Freedom Camping Bylaw 2021.</p> <p>2. SUBMISSION</p> <p>In general, the Board agrees with the proposed changes to the Freedom Camping Bylaw. The Board especially agrees with the proposal to change how the Council manages freedom camping at Te Nukutai o Tapoa Naval Point marine and recreational area in Lyttelton, by limiting the location and number of parks where freedom camping can occur at this site. The Board also supports the blanket ban on non-self-contained vehicles freedom camping in our existing bylaw, along with the need to review the self-containment regime to ensure it is delivering expected outcomes. It has come to the attention of the Board that there have been occurrences where freedom campers have illegally used the facilities at Pigeon Bay Camping Ground adjacent to the freedom camping area in Pigeon Bay. It is for this reason that the Board supports an addition to Schedule 1: Freedom</p> <p>Camping Prohibited Areas, to include the Pigeon Bay foreshore. The Board understands the need to balance freedom camping opportunities with necessary limitations in order to preserve the ecological health of Banks Peninsula and to ensure that future generations will have the opportunity to enjoy these areas for years to come.</p> <p>Yours sincerely,</p> <p>Tori Peden</p> <p>Chairperson</p> <p>Te Pātaka o Rākaihautū/Banks Peninsula Community Board</p>	Victoria Peden	Banks Peninsula Community Board	Chair
40403	Please see letter attached	James Imlach	New Zealand Motor Caravan Association Inc.	National Manager – Property and Policy
40400	Please refer to attached submission.	Josiah Thompson	North Beach Residents' Association	Chairperson

Avon-Heathcote Estuary Ihutai Trust



Christchurch City Council

Estuary Trust Submission: Freedom Camping Bylaw 2021

The Avon Heathcote Estuary Ihutai Trust

1. The Avon Heathcote Estuary Ihutai Trust (AHEIT, The Estuary Trust) is a charitable society registered in 2003. It was formed as a result of community requests over many years for the formation of an organisation that included committed representation from statutory bodies, tāngata whenua and other agencies.
2. The vision of the Trust is

Communities working together for
Clean Water
Open Space
Safe Recreation, and
Healthy Ecosystems that we can all enjoy and respect

*Toi tū te taonga ā iwi
Toi tū te taonga ā Tāne
Toi tū te taonga ā Tangaroa
Toi tū te iwi*

3. Further details about the Trust, it's Constitution, the Memorandum of Understanding between the Christchurch City Council, Environment Canterbury and the Trust, and the Trust's Estuary Management Plan, please visit our website at www.estuary.org.nz

Kit Doudney
Chairperson, AHEIT

[Redacted]

The Trust's submission



Freedom Camping Bylaw 2021

A. Windsport Park

The Trust Board appreciates the proposal to extend the prohibited area at Windsport Park, including Windsurfers Reserve. At any time of the year pukeko and spur-winged plovers may be seen in this feeding area. During the winter months hundreds of other estuarine birds flock here to feed.

B. The City Coastal Restricted Zone

We request that there be no freedom camping on the Estuary edge between Bridge Street and Southshore Spit. Our reasons for this request are as follows:

1. The Estuary is environmentally sensitive

The Estuary has records of two At-Risk declining fish species – the short fin eel and inaka/inanga. 19 Threatened and 29 At Risk bird species which use this part of the Estuary edge as their feeding grounds¹.

2. Onshore vehicle movements and human activities near the edge will cause an alteration in the availability of spawning site cover and food.

Wading birds usually take to flight when disturbed. This has been shown to displace them from preferred feeding or roosting areas or to abandon areas completely. Continued disturbance post and pre-migration and feeding can have a dramatic effect on a bird's energy balance.

Further disturbance could be eliminated by the creation of a “prohibited freedom camping” area on the side of the Estuary between Bridge Street and Southshore Spit.

3. Indigenous species overcrowding

Studies have shown that species diversity increases in disturbed habitats which is often due to opportunistic species moving in while indigenous species are overcrowded and move out. As stated above, this environment has too many threatened and at-risk birds now and further disturbance is unacceptable.

4. Privatisation of space and loss of visual amenity

The negative effects to freedom camping to the local community and wider Christchurch public and all visitors are seen as follows:

- conflict of use between freedom campers, residents and other site users
- a sense of loss of public space being privatised by campers i.e. where the presence of campers effectively excludes the public from an area
- emanations such as high noise levels, cooking odours, waste and sanitation
- impact on visual amenity, such as loss of privacy or obstructed views

For the above reasons we strongly reject the proposal to allow freedom camping on the Avon Heathcote Estuary Ihuta edge.

We wish to be heard.



New Zealand Motor Caravan Association Inc.

" Because you'll
never be alone
on the road again... "

21 June 2021

Christchurch City Council
53 Hereford Street
Christchurch Central
Christchurch 8013

Emailed to: samantha.sharland@ccc.govt.nz

NZMCA's submission on the Christchurch City Council's proposed Freedom Camping Bylaw 2021

Introduction

- 1 The New Zealand Motor Caravan Association Inc. (NZMCA) appreciates the opportunity to submit on the proposed freedom camping bylaw, which will replace the 2015 bylaw. To date, over 106,700 individual New Zealanders are members of the NZMCA and enjoy exploring our country at leisure in their self-contained motorhomes and caravans. Over 17,600 individual members reside in Canterbury and enjoy freedom camping in their own backyard.
- 2 The Statement of Proposal notes the Council is reviewing the 2015 bylaw in accordance with section 13(1) of the Freedom Camping Act 2011. Table 1 (below) summarises the NZMCA's position on the proposed changes to the 2015 bylaw. We also offer the following feedback on the full bylaw review:

Reserves Act 1977

- 3 Section 44(1) of the Reserves Act prohibits freedom camping on reserve land **unless** the activity is provided for in a reserve management plan or permitted by a local authority under delegated authority. The relationship between the Freedom Camping Act and Reserves Act is complex, making it difficult for freedom campers to know where they can and cannot lawfully freedom camp. The Reserves (Infringement Offences) Regulations 2019 enables local authorities to issue infringement notices up to \$800 for low-level offences under the Reserves Act, including inadvertently freedom camping in a prohibited reserve.
- 4 It is not clear whether the Council considered exercising its delegated authority under the Reserves Act to generally permit freedom camping in reserves that are not otherwise

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prohibited under the bylaw. The Whangarei and Tauranga City Councils have both applied this approach to their freedom camping bylaws, providing visitors and enforcement officers with a clear understanding of where you can and cannot lawfully freedom camp.

- 5 We recommend the Council exercises its delegated authority to allow freedom camping in reserves that are not otherwise prohibited under the bylaw.

Tents

- 6 Section 5(1) of the proposed bylaw continues to prohibit the use of tents while freedom camping, unless the area is set aside as a camping ground, or the person has received permission from the Chief Executive under section 9. Many kiwi families enjoy freedom camping in tents, and it is not clear whether the Council considered their interests when reviewing the bylaw. Section 9 of the bylaw applies to organised events only and therefore it may not provide kiwi families with the same opportunity to apply for permission.
- 7 We recommend the Council carefully assesses the bylaw's impact on kiwi families who may want to freedom camp responsibly in tents. We also recommend amending section 9, providing the Chief Executive with flexibility to approve applications from kiwi families in circumstances that do not involve organised events.

Temporary restrictions and prohibitions

- 8 Section 10 does not define 'temporary'. We have previously raised concerns with the Council's use of this provision. For example, we do not agree the Chief Executive can rely on section 10 to extend a 'temporary' prohibition until such time the bylaw is amended or reviewed. In our opinion, if the Council relies on section 10 it must provide a reasonable timeframe for the prohibition and any criteria to be met for it to be lifted. The Council's resolution must also consider the requirements for prohibiting and restricting areas under section 11(2) of the Freedom Camping Act.
- 9 We request time to speak to this submission.

Nāku noa, nā
New Zealand Motor Caravan Association Inc.



James Imlach
National Manager – Property and Policy

Table 1: NZMCA’s position on the proposed changes to the 2015 bylaw

Proposed changes to 2015 bylaw	Bylaw reference	NZMCA’s position	Reason(s) for the NZMCA’s position	Decision(s) the NZMCA wants Council to make
Updating the definition of “certified self-contained vehicle” to reflect an amendment to the Standard (NZS 5465:2001 A2)	Section 3 – Interpretation	Support	For the reasons noted in the Statement of Proposal	Adopt updated definition
Adding a clause to prevent campers from setting-up in a way that blocks thoroughfares	Section 7(4) – Restricted Activities	Support	For the reasons noted in the Statement of Proposal	Adopt new clause
Improving the process to temporarily waive or modify parts of the bylaw to enable camping for organised events	Section 9 – Prior permission from the Council for an organised event	Support	For the reasons noted in the Statement of Proposal	Adopt new clauses
New prohibited freedom camping area at North Beach Car Park, New Brighton, to enable better public access. This would replace the current temporary ban with a permanent ban	Schedule 1 – Freedom camping prohibited and restricted areas	Support	<p>For the reasons noted in the Statement of Proposal, on the understanding the prohibition applies at weekends between 1 October and 1 May each year.</p> <p>The explanation on the website is worded slightly different to the Statement of Proposal, which may suggest the prohibition applies at weekends throughout the year and at all times between 1 October and 1 May each year.</p> <p>Based on the Council’s rationale, we submit the prohibition should only apply to weekends between 1 October and 1 May each year.</p>	Adopt new prohibition at weekends between 1 October and 1 May each year

Creating a new zone, the City Coastal Restricted Zone, where camping in self-contained vehicles would be allowed for up to four nights in any 30-day period, with no more than two nights in any location	Schedule 1 – Freedom camping prohibited and restricted areas	Support	For the reasons noted in the Statement of Proposal	Adopt new restricted area with proposed restrictions
Changes to freedom camping at Te Nukutai o Tapoa Naval Point marine and recreation area in Lyttelton	Schedule 1 – Freedom camping prohibited and restricted areas	Support	For the reasons noted in the Statement of Proposal	Adopt new restricted area with proposed restrictions
Improving the description and map of the prohibited area at Windsport Park, near the Avon-Heathcote Estuary / Te Ihutai	Schedule 1 – Freedom camping prohibited and restricted areas	Support	For the reasons noted in the Statement of Proposal	Adopt proposed changes

20th June 2021
Christchurch City Council
Attention: Sam Sharland, Engagement Advisor

SUBMISSION ON THE CHRISTCHURCH CITY COUNCIL PROPOSED REPLACEMENT FREEDOM CAMPING BYLAW 2021

EXECUTIVE SUMMARY

1. The North Beach Residents' Association Inc. (NBRA) promotes the interests and progress of North Beach New Brighton, a residential suburb of Christchurch that includes all residential properties within the area bounded by Rawhiti Ave, Keyes Road, Marriotts Road, Bower Ave, Beach Road, Larnach Street, Broadpark Road and Marine Parade.
2. North Beach is a beachside suburb straddling the two surf lifesaving clubs of North Beach and Waimairi. Freedom camping is part of our surfing culture and has been a traditional activity of the surfing community here since the 1950s. Yet over the past decade, fed largely by international tourism, freedom camping has changed. Not only has it become more popular but the conventions of behaviour for this permissive activity have been ignored and abused, leading to a detrimental impact on local communities. As such, the proposed changes to The Freedom Camping Act 2011 and the Council's proposed Replacement Freedom Camping Bylaw 2021 are welcomed and should mitigate the worst excesses experienced over the last decade.
3. NBRA understands the rationale for the proposed City Coastal Restricted Zone but is concerned that an unintended consequence of the proposed bylaw will be to incentivize freedom campers to stay longer in the new zone. This submission seeks to ensure that the bylaw does not disadvantage North Beach residents or that the impact of freedom campers does not disproportionately fall on New Brighton.
4. Consequently, NBRA submits that provision outlined in Clause 7.2 Restricted Activities allowing freedom campers to stay a maximum of four days in the City Coastal Restricted Zone should be deleted. It creates an anomaly that is inequitable and disadvantages the residents of New Brighton.
5. Similarly, NBRA submits that the permanent prohibition of freedom camping at North Beach Car Park during the weekends from 1 October to 1 May be extended to weekdays during the same period.
6. NBRA seeks clarification as to how the Council plans to adequately enforce the proposed bylaw.

LEGISLATIVE AND LOCAL COUNCIL REGULATORY CONTEXT

7. Freedom camping is a permitted activity preserved within the Freedom Camping Act 2011 (FCA). That act enshrined freedom camping as a customary right and traditional activity. The then MP for Christchurch Central, Nicky Wagner, defined it as such when she stated:

“The [FCA], 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.”

Traditionally freedom camping occurred in largely isolated places — e.g. the unexplored surf breaks of this community’s youth. Yet since 2011 it has changed. Fed largely by international tourism and enabled by an unregulated rental vehicle industry, it has become more popular and now encroaches into urban environments. At the same time the conventions of behaviour have been ignored and abused with a consequential detrimental impact on local environments.

Nationally freedom camping has become highly controversial. On the one hand, local communities have protested about its impact on their local environment; on the other hand, industry associations — including tourist bodies, the vehicle rental industry and the NZ Motor Caravan Association — have argued that it brings economic benefits to those same communities. Our own experience as a community has been that during peak tourist seasons — when there were often 20-30 freedom campers parked along our stretch of Marine Parade — local residents have had to endure overcrowded carparks and litter including faeces, toilet paper and food packaging in the dunes adjacent to where campers parked. There were no discernible economic benefits.

8. If the then Government’s purpose in the legislation was to preserve freedom camping as traditional activity, it failed to provide the regulatory framework for local councils to appropriately manage freedom camping while leaving local authorities with the statutory obligation to provide the infrastructure necessary to support the activity — e.g. wastewater dump stations, rubbish facilities, and public toilets.
9. The Government has recently announced proposed changes to the FCA, the most significant of which will be to limit freedom camping to those vehicles that display a self-containment certificate (NZS 5465:2001), prescribing the requirements for water supply, sanitary plumbing and drainage installation and solid waste containment in motor caravans and caravans. The Council’s response has been its (Proposed) Freedom Camping Bylaw 2021. In addition to permitting freedom camping only to those vehicles that display a self-containment certificate, it also prohibits freedom camping in certain areas (e.g. CBD) and restricts certain activities (e.g. a maximum stay of 2-4 nights in any one location within a 30-day period).

In principle, both the proposed changes to the FCA and the replacement bylaw are welcomed and should mitigate the worst excesses experienced prior to 2020.

THE PROPOSED CITY COASTAL RESTRICTED ZONE

10. The rationale for the creation of the new City Coastal Restricted Zone is that it will allow what is already a popular destination for freedom campers to be better regulated.

“Marine Parade is over 6km long, and under the current bylaw, a person could camp for two nights, move 500m, camp for a further two nights, and repeat, remaining in the area for 24 nights without breaching the bylaw. This is not what was intended. The impact of this practice is greater when it is a community of campers that regularly move around the same area.”

Nevertheless, the new City Coastal Restricted Zone needs to be seen in the context of the proposed extensions to prohibited areas — particularly Windsport Park and Naval Point — and the proposed exception to restricted activities (Clause 7.2), allowing freedom campers to stay in the zone for four nights.

The new bylaw draws attention to the fact that campers are allowed to stay four nights in the Coastal zone, and the effect will be to further concentrate freedom camping within the new coastal zone, leaving New Brighton residents to bear the brunt of the impact of freedom camping within the city.

RESTRICTED ACTIVITIES

11. NBRA submits that the provision outlined in Clause 7.2 of the Statement of Proposal is an anomaly and should be deleted to ensure that restricted activities within the new City Coastal Restricted Zone *align* and are *consistent* with activities in other restricted areas prescribed in the proposed bylaw.

Whereas clause 7.1 restricts freedom campers to a maximum stay in any location of two nights within a 30-day period within the Council’s restricted areas, Clause 7.2 applies only to the new City Coastal Restricted Zone and allows freedom campers to stay for a maximum of “up to *four* nights within a 30-day period, with no more than two nights in the same place”.

12. Significantly, the provision in Clause 7.1 that freedom campers “must not be within 500 metres of a location where the person has previously freedom camped within a 30-day period” does not apply to Clause 7.2.

Effectively, this is giving permission for a freedom camper or —as the Council acknowledges — a community of campers to stay in the same place for four days. As worded, a freedom camper only needs to move two metres after two days to comply with the bylaw.

13. The net effect will be to incentivize freedom campers to stay in the new zone precisely because they can stay there longer with fewer restrictions than in other restricted areas.

A key legislative requirement of any bylaw is that it needs to be “reasonable” and “proportionate”. In this respect, the proposed provision allowing freedom campers to stay in the City Coastal Restricted Zone for four nights in the same locality fails to meet that legislative threshold — the impact of freedom camping will disproportionately and inequitably fall on New Brighton residents.

NORTH BEACH CAR PARK PROHIBITED AREA

14. NBRA welcomes the permanent prohibition of freedom camping at North Beach Car Park during the weekends from 1 October to 1 May. This is an acknowledgement that the carpark’s popularity with freedom campers has had a detrimental impact on residents’ access to the facilities the carpark provides. As the Statement of Proposal acknowledges:

“The carpark services both the surf lifesaving club and the community hall, along with providing access to the beach and park. ... Shorter turnaround of car parking is needed for better access to facilities, club activities and the beach.”

15. Nevertheless, NBRA submits that the prohibition also be extended to weekdays during the same period of 1 October to 1 May.
16. When the temporary weekend ban was imposed, the prevailing assumption was that because the carpark is busier during the weekend, any disruption caused by freedom campers would be minimal during weekdays. At no point was weekday traffic at the carpark monitored.

As it is, the carpark is popular not just in the weekend but throughout the week during the warmer months. Apart from those using the surf lifesaving club and community hall, it is a focal point for the local community — a place where people can catch up over a cup of coffee. Providing as it does arguably the easiest access to the beach along Marine Parade, it is also popular with residents across Christchurch wanting to enjoy the beach. They may only be there for 30-60 minutes but this is happening throughout the day.

In addition, the Association and the North Beach Surf Lifesaving Club have been promoting North Beach as a destination to those with disabilities. The Association has funded and the surf lifesaving club provides the logistical support for a wheelchair access mat — one of only a few such access mats in New Zealand — allowing those with a range of disabilities easy access to the beach. The presence of freedom campers will potentially disrupt such people’s access to the beach.

17. In this respect, the provision to allow freedom camping at the carpark during the week contravenes the intention of the Council’s proposed clause “to prevent freedom campers from setting up in a way that blocks thoroughfares”.

“The new clause would prevent freedom campers from setting up their camping vehicle or camping equipment in a way that limits the normal movement of vehicles or pedestrians, or otherwise block a thoroughfare. ...

This proposed clause complements an existing clause to prevent overcrowding, which allow only one vehicle per marked parking space. It supports better access and protects the health and safety of people who may visit the area.”

The NBRA contends that any freedom camping in the carpark is blocking this thoroughfare and preventing the “shorter turnaround” the Council acknowledges “is needed for better access to facilities, club activities and the beach.” As the proposed bylaw is currently worded, a freedom camper or a community of freedom campers would be legally be entitled to stay in the car park for four days, needing only to move to the next car park space during that time. At what point during the week does their presence become disruptive, onerous and inequitable — at one, five or ten vehicles?

18. Originally, the intention in allowing freedom campers to stay in the carpark was that they would be able to access the toilet facilities next to the surf club. However, now that freedom camping vehicles have to self-contained, that rationale no longer applies — they no longer need the toilet facilities and no longer need to stay in the carpark.

ENFORCEMENT

19. NBRA seeks clarification as to how the Council plans to adequately enforce the proposed bylaw. With a stricter regulatory environment comes the need for greater oversight and resources to ensure that freedom campers adhere to the new regulations. Of interest is how the Council intends to monitor vehicles displaying self-containment stickers and what measures will be taken to those that infringe the regulations.

Yours faithfully



Josiah Thompson

Chairperson

North Beach Residents' Association.

Submission ID	Tell us what you think about the new proposed changes to the bylaw	Name	Name of organisation	Your role within organisation
40321	<p>Submission of the SSRA on the Freedom camping proposal – Coastal Zone While freedom camping in our Coastal area has not been without its problems, the SSRA generally support well controlled and policed Freedom camping. Our mixed views on Freedom camping are dependent on the area the campers will be utilising. We generally agree that freedom campers in the vicinity of the New Brighton business area contribute to the economic wellbeing of the community. We support controlled freedom camping in these areas. SSRA do not support freedom camping in the Southshore area (Caspian street and beyond). For the following reasons and request that the Southshore area be a prohibited recreational area similar to the windsurfing park at Ferrymead.</p> <ul style="list-style-type: none"> • The side streets that end at the estuary off Rocking Horse Road are inappropriate for freedom camping as they would be parked immediately adjacent and too close to residential homes. • Our residents have already reported issues of excessive rubbish, noise and urinating in these small cul-de-sac areas. While we understand that the freedom camper should be self-contained this has not been the experience of our residents. • There are no other options but street side parking in Southshore as we have no laybys or large off street parking areas like Marine parade. • Our RedZone area is camping prohibited. • The parking at the end of the small cul-de-sac will reduce resident parking. • Vehicles will potentially block emergency access and general public access to the amenity. • There is only one public toilet facility in Southshore. <p>During Covid the recreational diversity and beauty of Southshore was discovered by the wider city. As a result, the spit end of south shore is at full capacity at the weekend with parking by Christchurch locals, fishers and families who access the beach for recreation and fishing. We would like our Christchurch residents to be able to continue enjoying this access.</p> <p>Concerns and suggestions</p> <p>“Under the existing bylaw, campers in certified self-contained vehicles can stay by the coast for up to two nights in a 30-day period but can’t camp within 500 metres of where they have previously stayed. Some campers are staying in the area for an extended period of time by moving short distances every few nights, using the 500-metre rule. Under the new proposal, camping in self-contained vehicles would still be allowed, and the maximum stay would be four nights in a 30-day period in the new zone. Campers would still need to move after two nights, and could go somewhere else in the zone for a further two nights”</p> <p>The Coastal Zone is large, History has shown that control, policing, and monitoring has not been consistent or well structured. This is a concerning issue. We see no information or plan on how you intend to structure the policing and monitoring. How are you going to combat the fake stickers? Who will monitor the 2 night stay- move plus the second 2 night stay and then leave the coastal zone procedure? We would like to hear more on the how, the who and the what you are going to put in place to provide a better outcome than previous achieved. After looking at the maps it came to SSRA attention that much of CHC is a freedom camping zone. From a management point of view, we can see how it would be difficult to manage such a broad area and wonder why you do not designate multiple specific zones so that monitoring and control processes could be more efficiently applied. SSRA support the extension of the Nth Beach car park prohibited weekend zone and requested that numbers should be restricted there also. There needs to be clear designated Camping area outlines on the carpark surface for each camper. This would also work in the New Brighton car park so that it allows for local parking. Could areas of the redzone that are not close to residential areas, be used for seasonal periods? We suggest rather than one big area in the redzone, a number of small areas with a 5 or 6 camper maximum. Atheistically and environmentally better and a safer and more controlled environment for campers. This approach is common in western Australia. Where there are several small camp sites along a strip of coastal area and due to there smaller nature, do not impact on the enjoyment of the area. SSRA are keen to support local and while you may feel the South Brighton campground is not relevant to this conversation because this bylaw is related to freedom campers, not paid campers - we believe this is a flawed view. If the structure of your processes and your monitoring is not sufficiently robust then you will be continuing to support those that are not legitimate self-contained freedom campers to camp outside of the very campgrounds they should be using. Please consider the effect on the South Brighton Campground. These campgrounds are disappearing all over the country. They are part of our history and are a taonga that our community cherishes. In Summary Freedom Camping can be beneficial to our area if robust and clear processes are put in place. SSRA support the restricted Coastal Zone with the exclusion of Southshore. SSRA support the extension of the Nth Beach car park prohibited weekend zone and request that numbers be restricted there. SSRA and its residents request that Southshore be a special prohibited freedom camping zone set aside for recreation similar to Ferrymead wind park. We would like to see your monitoring and policing plan. We support the possibility of a small group approach, of limited and seasonal redzone areas as a transitional project. Areas must be assessed to be of low impact for residents. Please consider the Value of the South Brighton Holiday Park and the effect your policies may have on them. If you would like to discuss any of this submission please don’t hesitate to contact the SSRA</p>	Sue Carbines	SSRA	Chair

Submission of the SSRA on the Freedom camping proposal – Coastal Zone

While freedom camping in our Coastal area has not been without its problems, the SSRA generally support well controlled and policed Freedom camping.

Our mixed views on Freedom camping are dependent on the area the campers will be utilising.

We generally agree that freedom campers in the vicinity of the New Brighton business area contribute to the economic wellbeing of the community. We support controlled freedom camping in these areas.

SSRA do not support freedom camping in the Southshore area (Caspian street and beyond). For the following reasons and request that the Southshore area be a prohibited recreational area similar to the windsurfing park at Ferrymead.

- The side streets that end at the estuary off Rocking Horse Road are inappropriate for freedom camping as they would be parked immediately adjacent and too close to residential homes.
- Our residents have already reported issues of excessive rubbish, noise and urinating in these small cul-de-sac areas. While we understand that the freedom camper should be self-contained this has not been the experience of our residents.
- There are no other options but street side parking in Southshore as we have no laybys or large off street parking areas like Marine parade.
- Our RedZone area is camping prohibited.
- The parking at the end of the small cul-de-sac will reduce resident parking.
- Vehicles will potentially block emergency access and general public access to the amenity.
- There is only one public toilet facility in Southshore.
- During Covid the recreational diversity and beauty of Southshore was discovered by the wider city. As a result, the spit end of south shore is at full capacity at the weekend with parking by Christchurch locals, fishers and families who access the beach for recreation and fishing. We would like our Christchurch residents to be able to continue enjoying this access

Concerns and suggestions

“Under the existing bylaw, campers in certified self-contained vehicles can stay by the coast for up to two nights in a 30-day period but can’t camp within 500 metres of where they have previously stayed. Some campers are staying in the area for an extended period of time by moving short distances every few nights, using the 500-metre rule.

Under the new proposal, camping in self-contained vehicles would still be allowed, and the maximum stay would be four nights in a 30-day period in the new zone. Campers would still need to move after two nights, and could go somewhere else in the zone for a further two nights”

The Coastal Zone is large, History has shown that control, policing, and monitoring has not been consistent or well structured. This is a concerning issue.

We see no information or plan on how you intend to structure the policing and monitoring.

How are you going to combat the fake stickers?

Who will monitor the 2 night stay- move plus the second 2 night stay and then leave the coastal zone procedure?

We would like to hear more on the how, the who and the what you are going to put in place to provide a better outcome than previous achieved.

After looking at the maps it came to SSRA attention that much of CHC is a freedom camping zone. From a management point of view, we can see how it would be difficult to manage such a broad area and wonder why you do not designate multiple specific zones so that monitoring and control processes could be more efficiently applied.

SSRA support the extension of the Nth Beach car park prohibited weekend zone and requested that numbers should be restricted there also. There needs to be clear designated Camping area outlines on the carpark surface for each camper. This would also work in the New Brighton car park so that it allows for local parking.

Could areas of the redzone that are not close to residential areas, be used for seasonal periods? We suggest rather than one big area in the redzone, a number of small areas with a 5 or 6 camper maximum. Atheistically and environmentally better and a safer and more controlled environment for campers. This approach is common in western Australia. Where there are several small camp sites along a strip of coastal area and due to there smaller nature, do not impact on the enjoyment of the area

SSRA are keen to support local and while you may feel the South Brighton campground is not relevant to this conversation because this bylaw is related to freedom campers, not paid campers - we believe this is a flawed view.

If the structure of your processes and your monitoring is not sufficiently robust then you will be continuing to support those that are not legitimate self-contained freedom campers to camp outside of the very campgrounds they should be using. Please consider the effect on the South Brighton Campground. These campgrounds are disappearing all over the country. They are part of our history and are a taonga that our community cherishes.

In Summary

Freedom Camping can be beneficial to our area if robust and clear processes are put in place.

SSRA support the restricted Coastal Zone with the exclusion of Southshore

SSRA support the extension of the Nth Beach car park prohibited weekend zone and request that numbers be restricted there.

SSRA and its residents request that Southshore be a special prohibited freedom camping zone set aside for recreation similar to Ferrymead wind park

We would like to see your monitoring and policing plan.

We support the possibility of a small group approach, of limited and seasonal redzone areas as a transitional project. Areas must be assessed to be of low impact for residents.

Please consider the Value of the South Brighton Holiday Park and the effect your policies may have on them.

Submission ID	Tell us what you think about the new proposed changes to the bylaw	Name	Name of organisation	Your role within organisation
40377	<p>Introduction The Akaroa Civic Trust is a volunteer society that has been working to preserve the historic character and natural amenity of the town and surrounding area since 1969. Membership is composed of local residents as well as ratepayers living in Christchurch and around New Zealand. Some members reside overseas and visit Banks Peninsula whenever possible. Submission The Akaroa Civic Trust generally supports the proposed changes to the Bylaw and acknowledges that central Government will be proposing national changes which may lead to amendments in the Freedom Camping Act. Summary of proposed bylaw changes</p> <ul style="list-style-type: none"> Updating the definition of “certified self-contained vehicle” to reflect the amendment to the Standard (NZS 5465:2001) in 2017 Adding a clause to prevent campers from setting-up their camp in a way that blocks thoroughfares Improving the process to temporarily waive or modify parts of the bylaw to enable camping for organised events Adding a new prohibited freedom camping area at North Beach Car Park, New Brighton, to enable better public access for weekend events and beach access over the warmer months Creating a new zone, the City Coastal Restricted Zone, where camping in self-contained vehicles would be allowed for up to four nights in any 30-day period, with no more than two nights in any place Changing how we manage freedom camping at Te Nukutai o Tapoa Naval Point marine and recreation area in Lyttelton to enable better public access Improving the description and map of the prohibited area at Windsport Park, near the Avon-Heathcote Estuary / Te Ihutai. Akaroa Random freedom camping has been a long term problem in Akaroa and the surrounding countryside. Freedom campers in old cars and vans continue to congregate around the recreation ground parking area in Akaroa. Most display blue self-contained stickers, however it is doubtful if all vehicles are fully equipped to meet Standard (NZ 5465:2002). Sustainability and Community Resilience Committee Agenda, April 28, 2021 page 27 states *See Attachment for complaints and infringements (fines) since the bylaw was adopted in 2015 table Therefore <ol style="list-style-type: none"> monitoring and enforcement are required in Akaroa between November and April and fines should be issued to non-compliant freedom campers the lack of international visitors due to COVID-19 restrictions has reduced the problem of toilet paper scattered around areas such as the Akaroa Lighthouse and the designated 2 night freedom camping area at the recreation ground, however between February through April 2021 toilet paper became a problem near the boat compound and Grehan stream <ul style="list-style-type: none"> Christchurch City Council must continue to actively monitor the situation during the summer/tourist season as a matter of public health and safety to ensure the wellbeing of the community as well as visitors to the township. adequate funding is required to underwrite the cost of monitoring and enforcement fines should be issued to offenders to assist in offsetting the cost of monitoring and enforcement which should be borne by non-compliant freedom campers, not ratepayers the Council received \$266,711 from the Government’s Responsible Camping Fund for the 2020-21 season for education, monitoring and enforcement; local police can patrol the township and issue fines if instructed to do so 	Victoria Andrews	The Akaroa Civic Trust	Deputy Chair
40386	The Waipuna Halswell Hornby Riccarton Community Board supports the Proposed replacement Freedom Camping Bylaw 2021.	Faye Collins	Waipuna Halswell Hornby Riccarton Community Board	Community Board Adviser
40297	Broadly supportive of the proposed changes	Bebe Frayle	Waitai Coastal-Burwood Community Board	Chairperson, Submissions Committee

SUBMISSION TO: Christchurch City Council
ON: Proposed Replacement Freedom Camping Bylaw 2021
BY: Waipuna Halswell-Hornby-Riccarton Community Board
CONTACT: Faye Collins
Community Board Adviser
faye.collins@ccc.govt.nz

1. INTRODUCTION

- 1.1. The Waipuna Halswell-Hornby-Riccarton Community Board (“the Board”) appreciates the opportunity to make a submission on the Council’s Proposed Replacement Freedom Camping Bylaw 2021 (“the Bylaw”).
- 1.2. This submission was compiled by the Board’s Submissions Committee under the delegated authority granted by the Board.
- 1.3. The Board wishes to be heard in support of its submission.

2. SUBMISSION

- 2.1. The Board supports the general approach of the current bylaw, requiring that all freedom camping is in certified self-contained vehicles (with facilities on board) and providing some areas where freedom camping is prohibited entirely, and other areas where freedom camping is restricted to camping for up to two nights within any 30-day period.
- 2.2. The Board supports the updating the definition of “certified self-contained vehicle” to reflect an amendment to the Standard (NZS 5465:2001 A2) to ensure on-board toilets in camping vehicles are accessible when the bed is made up and provides for the certification to set out the number of occupants the vehicle is certified for. The Board notes that the standard sets the process and requirements for independent qualified assessors to certify camping vehicles and allows for self-containment to be demonstrated by the display of a warrant card.
- 2.3. The Board also supports the proposal to include an additional clause in the Bylaw to prohibit campers from setting up their camping vehicle or camping equipment in a way that limits the normal movement of vehicles or pedestrians, or otherwise blocks a thoroughfare. The Board

is aware that issues have arisen in the past due to the competing interests of campers and other users of public areas where freedom camping is allowed but which were not designed to accommodate camping.

- 2.4. The Board agrees with the proposal regarding the process for the Chief Executive to upon application temporarily waive or modify parts of the bylaw to enable camping for organised events in areas where such camping is not normally allowed. The Board notes that this was the intention of the current bylaw but that there is insufficient clarity in the existing provision to allow this.
- 2.5. The Board supports the proposal to make the current temporary ban freedom camping area at North Beach Car Park, New Brighton, a permanent ban from 7pm Fridays until 7pm Sundays, between 1 October and 1 May each year. The Board recognises that the car park is used for the surf lifesaving club and the community hall and provides access to the beach and park as well as being a popular freedom camping site. These sometimes competing interests need to be balanced. The Board considers that the proposed weekend prohibition of freedom camping over the period of the surf lifesaving season does this.
- 2.6. The Board supports the proposed new City Coastal Restricted Zone that allows camping in self-contained vehicles for up to four nights in any 30-day period, with no more than two nights in any place noting that the current prohibited areas within this zone will continue. The Board agrees that the proposed restrictions to limit the number of freedom campers remaining in the area for extended periods will provide better protection for the area while maintaining access to the area for all users of this popular area.
- 2.7. The Board accepts that changes are needed to the management of freedom camping at Te Nukutai o Tapoa Naval Point marine and recreation area in Lyttelton to improve access to the area by recreational, club and other users (such as the coast guard). The Board supports the proposal to limit the location and the number of parks where freedom camping can occur at the Naval Point site, enabling about 18 camping vehicles per night, as a means of balancing access for all users.
- 2.8. The Board supports the inclusion of an improved description and map of the prohibited area at Windsport Park, near the Avon-Heathcote Estuary / Te Ihutai.

3. CONCLUSION

- 3.1. The Board requests that the Council take into consideration the above submission on Proposed Replacement Freedom Camping Bylaw 2021.

A handwritten signature in black ink that reads "Mike Mora". The signature is written in a cursive, slightly slanted style.

Mike Mora

Chairperson Waipuna Halswell-Hornby-Riccarton Community Board

Dated 15 June 2021

SUBMISSION TO: Christchurch City Council

ON: Proposed Replacement Freedom Camping Bylaw 2021

BY: Waitai Coastal-Burwood Community Board

CONTACT: Bebe Frayle
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1. INTRODUCTION

The Waitai Coastal-Burwood Community Board appreciates the opportunity to make a submission to the Christchurch City Council on the Proposed Replacement Freedom Camping Bylaw 2021.

The Board wishes to be heard in support of this submission.

2. SUBMISSION

The Board supports the proposal to change the Freedom Camping Bylaw. The proposed changes strike a good balance between encouraging and welcoming responsible campers who bring positive benefits to areas they visit and mitigating the impacts of freedom campers who push the boundaries of acceptable environmental practices and behaviour that creates a nuisance for locals.

Updating the definition of certified self-contained vehicle to reflect the amendment to the Standard (NZS:5465:2001) in 2017

The Board supports the tightening of rules around what is classified as "self-contained" and hope that this will reduce the number of freedom campers using makeshift or camping toilets that are not fit-for-purpose in a camper.

The Board is concerned that it is too easy to obtain a "self-contained" sticker without being certified. For example, we are aware that the stickers can be purchased locally without having to go through any self-containment checks. We would like to see close monitoring of self-contained freedom campers to ensure that those displaying the stickers are in fact fully self-contained. There should be penalties for campers who breach the self-containment certification process and/or incorrectly display a sticker.

Additionally we note that the current definition of a certified self-contained vehicle is not specific enough with regard to the toilet facility, and should require permanently plumbed toilet containment (usually a specifically designed cassette).

We note that a potential impact of requiring that freedom campers are fully self-contained is that they will need places to dump their grey/black water. We would like to see the Council install more places for waste disposal in our Wards. Funding is available through New Zealand Motor Caravan Association (NZMCA) to support this.

Adding a clause to prevent campers from setting-up camp in a way that blocks thoroughfares

The Board supports this proposal.

Improving the process to temporarily waive or modify parts of the bylaw to enable camping for organised events

The Board supports this proposal.

Adding a new prohibited freedom camping area at North Beach Car Park, New Brighton, to enable better public access for weekend events and beach access over the warmer months

The Board supports this proposal.

We suggest it is amended to include restrictions on the number and location of parking in the months when freedom camping is available (as is being proposed for the Te Nukutai o Tapoa Naval Point marine and recreation area in Lyttelton).

Creating a new zone, the City Coastal Restricted Zone, where camping in self-contained vehicles would be allowed for up to four nights in any 30-day period, with no more than two nights in any location

The Board supports this proposal.

The Board suggests that the restricted zone is extended to include Broadpark Road and Larnach Street so that freedom campers could make use of the parking available beside Broad Park.

Conversely, we suggest that freedom camping be prohibited in Southshore from Caspian Street to the Spit, as this area is not suitable for camping – it has few amenities and campers could make evacuation difficult if this was necessary.

Changing how we manage freedom camping at Te Nukutai o Tapoa Naval Point marine and recreation area in Lyttelton to enable better public access

The Board supports this proposal.

Improving the description and map of the prohibited area at Windsport Park, near the Avon-Heathcote Estuary/ Te Ihutai

The Board supports this proposal.

We suggest that all areas that have restrictions on freedom camping need to have clear and consistent maps and explanations of the rules.



Bebe Frayle
Chairperson, Submissions Committee
WAITAI COASTAL-BURWOOD COMMUNITY BOARD
24 May 2021

Submission ID	Tell us what you think about the new proposed changes to the bylaw	Name	Name of organisation	Your role within organisation
40392	<p>Dear Sir-Madame.I wish to make a short submission to your bylaw review.By restricting camping to self contained vehicles you are banning freedom campers who walk, who cycle , or ride on horseback. You are rewarding those who contribute to Global warming, and punishing those who do not. Diesel and petrol camper-vans pollute the atmosphere. contribute to bad air quality, and are known as a major cause of Global Warming. A recent report by the Climate change Commission recommends banning new petrol and diesel vehicles in the future.As a cyclist who freedom camps from time to time I find it offensive that people who do not contribute to Global warming are banned from freedom camping by some councils.Many Councils in New Zealand allow freedom camping in tents and I have spent 10 days (out of 40) doing just that on a recent tour of the South Island. Including in Hurunui, just north of your City. Tents are not really a problem if they are properly managed and appropriate sites are found.I suggest you look again at where tents can easily be accommodated in your city and then allow tenting at such sites. The main criteria are of course a nearby public toilet, and somewhere safe to pitch a tent where it does not present a hazard to other people.By making Freedom Camping accessible to non climate changing campers you are taking a tiny little step along the way of solving the problem of global warming.2 Restricting freedom camping to owners or renters of CSC vehicles is a form of systemic racism. There are virtually no Maori who have CSC vehicles or who can afford to rent them. It just does not happen. You need to consider allowing normal vehicle owners to freedom camp so that Maori can also participate in this wonderful activity.Kind regards</p>	Donald Putan		
40232	<p>They just tinker with a problem that should not exist: simply put, there should be no freedom camping allowed. Camping should be permitted only in designated campgrounds, whether privately owned or publicly run. The notion that it is the right of 'campers' to park up where they want, or that we the public should be expected to fund and provision this type of activity is wrong. Let so-called freedom campers pay the modest fees for a site in an approved camping area, just like any other tourists have to do with motels, hotels, campgrounds, etc. There are pressing ecological and economic reasons for disallowing freedom camping as well. Our main attraction--our land and coastline--is being debased by uncontrolled camping/campers, and small businesses set up to accommodate the tourist trade (of all sorts) is being by-passed. Worse, freedom camping is being prioritised and even encouraged by local towns that spend tax money to supply toilet and shower facilities for freedom campers. Simply ban it and tourists will adapt to the existing rules, as every Kiwi must do when visiting other countries.</p>	Robert Manthei		
40165	<p>I find the proposed changes to the majority of the bylaws acceptable apart from "Creating a new zone, the City Coastal Restricted Zone, where camping in self-contained vehicles would be allowed for up to four nights in any 30-day period, with no more than two nights in any place". Within the City Coastal Zone, I believe there should be a complete ban on freedom campers. The City coastal zone has and is continuing to be, very popular with the Brighton Community - from North Beach to South Shore. This coastal zone for many years, has suffered from a lower social economic bracket settling in the area, to the point where we now have numerous gangs and unacceptable behaviour within the area. There are many community organisations in this Coastal Zone that are working hard on improving the overall tone and culture within this area. Having freedom campers camp along various parts of this Coastal Zone, is adding nothing to improving the look of the area. They are not using the bathroom facilities provided, they are not removing their rubbish and they basically contribute nothing to the Coastal area other than yet again, lowering the overall look of the area. The addition of the Salt Water Pools and Children's Playground has helped improve the look of the area. But we still deal with a derelict Mall and derelict properties. In South Brighton, there is a Camping Ground situated close to the Avon-Heathcote Estuary. Why, when there is a perfectly good Camping Ground within a 2 kilometer radius of the Coastal Zone, are Campers not encouraged to go there. We, as NZers, use our Camping Grounds. We support Community Businesses who contribute to the area and Community. By putting a blanket ban along the entire Coastal Zone from North Beach to South Shore, will get rid of those Vans that will never abide by any change in the Bylaws. How will you police such changes? As another matter, we had an Airbnb in Southshore. We were offering accommodation to people who wanted to experience a coastal holiday in Christchurch. We were stopped from having that Airbnb because we had to pay an exorbitant resource consent fee and couldn't get approval from our neighbours. Our guests were well managed and made virtually no noise - yet Council allow Freedom Campers to settle free along our beautiful Coastline, contribute filth to the environment, create unrest and noise where they are and they do so "free". It is wrong on all levels. They don't even have to pay for cleaning the area like we have to in DOC sites, They don't even pay to use the toilets, which we have to in DOC sites. Council - think about it. Ban these people that come in to get a "free' holiday in NZ. What do they offer our country?</p>	Susan McKenna		

Submission ID	Tell us what you think about the new proposed changes to the bylaw	Name	Name of organisation	Your role within organisation
40163	There should be no freedom camping areas in New Brighton or Southshore. There is a campground in South New Brighton that people can use. If freedom camping is allowed it should have designated areas in all suburbs of the city not just New Brighton or Lyttelton.	Scott Mcilraith		
40157	As stated by the government, I believe now is the perfect time to look at the environmental impact of tourism and its impact on our beautiful coastlines. New Zealanders have, I believe, been brought up to be tidy kiwis (our overriding values of caring for our country's). Unfortunately freedom campers have a sad reputation for leaving waste, both rubbish and human form, in some of our most stunning areas and because of this I feel there should be allocated areas where free camping, with toilets available, but a booking number limit allocated to prevent some of the sad things that have been happening around the country.	Toni Minson		