

REPORT 2

ORAL HEARINGS – FREEDOM CAMPING

Time	Name	Organisation	Submission Number	Page
10.45am	Maria van der Meel	The City is Ours Inc	19	
10.55am	Bernard O'Shaughnessy	Individual	33	
11.05am	Stephen Mishkin	Individual	23	
11.15am	James Imlach	New Zealand Motor Caravan Association Inc.	32	
11.25am	Ellen Blake	Individual	38	
11.35am	10 Minute Buffer			
11.45am	Bill King	Individual	37	
11.55pm	Michael Faherty	Wellington Waterfront	No submission	
12.05pm	Ann McCrone	Friends of Taputeranga Marine Reserve trust	25	
12.15pm	Simon Craggs	Individual	No submission	
12.30pm	Lunch			
1.00pm	Catherine Lawson	Individual	41	
1.10pm	Pauline Swann	Waterfront Watch	39	

SUBMISSION
NUMBER

19

Sharon Bennett

From: Wellington City Council [webcentre@wcc.govt.nz]
Sent: Friday, 6 September 2013 1:33 p.m.
To: BUS: Policy Submission
Subject: Camping in Wellington - Submission

The following details have been submitted from the Camping in Wellington consultation form on the Wellington.govt.nz website:

First Name: Maria
Last Name: van der Meel
Street Address: 2/20 Trent Street
Suburb: Island Bay
City: Wellington
Phone: 3834993
Email: thecityisours1@hotmail.com
I would like to make an oral submission: Yes

Phone number for oral submission: 0273226311

I am making this submission: on behalf of an organisation

Organisation name: The City is Ours Inc.

1. Which of the following best describes you?

I sometimes choose to camp when I travel, I live near a site used by campers

What are your general views on freedom camping in Wellington?

Freedom camping is complying with the Act and our Bill of Rights. Bylaws restricting or prohibiting such activities are necessary but can also make for visitor unfriendly environments and forces council into a position where they might be breaching the bill of rights.

3. Where in Wellington do you think camping could be encouraged?

South Coast

4. Do you have any suggestions on how / where Wellington could provide a permanent campground close to the city?

Hataitai Park - Mount Victoria

5. Do you agree with our proposed restricted and prohibited areas for camping?

No - some prohibitions have come as a result of Occupy Wellington and affects our freedom under

the Bill of Rights. Free camping prohibition in a City with a high density population particularly in Te Aro needs careful planning (New Zealand Statistic 1996-2006 increased population counts of 74% in Te Aro). It will be critical in the case of an emergency; we can't all fit into the Westpac Stadium. Good infrastructure and strategically placed water storage tanks will help enhance these sites and optimally you will work together with the water storage tank placement scheme starting in Tawa so potential free camping/emergency grounds can function well and is paramount. The water storage tanks has a budget and is to be completed by 2015.

6. Are there other areas in Wellington where camping should be restricted or prohibited, or where you think we should keep an eye on?

NO - depends who's keeping an eye on - the council park ranger or another private company?

7. Do you have any other suggestions or comments about this proposal?

It is important if not compulsory that this consultation paper includes WEMO and asks where free camping/emergency sites would be best placed to cater for displaced citizen's during an event.

Close to roads - public transport toiler/shower facilities etc.

CAMPING IN WELLINGTON -- HAVE YOUR SAY

Absolutely
POSITIVELY
HE HEKE KI PŌHŌKE
WELLINGTON CITY COUNCIL

Wellington City Council, 101 Wakefield Street, PO Box 2199, Wellington 6140.
Phone 499 4444, Wellington.govt.nz

SUBMISSION
NUMBER
33

We are keen to get your thoughts on changes to the Council's camping bylaw.
You can have your say:

- by making a submission on this form or in writing, and send it to us by
 - post: Camping Bylaw, PO Box 2199, Wellington 6140
 - fax: 04 801 3231
- by making a submission online at Wellington.govt.nz
- by emailing: policy.submission@wcc.govt.nz

YOUR NAME AND CONTACT DETAILS

(Please tick appropriate box)

<input checked="" type="checkbox"/> Mr	<input type="checkbox"/> Mrs	<input type="checkbox"/> Ms	<input type="checkbox"/> Miss	<input type="checkbox"/> Dr
*First name/last name BERNARD O'SHAUGHNESSY				
*Street address 1399 DANIELL ST, NEWTON				
Phone/mobile				
Email BernardCofell@yahoo.co.nz				

* Mandatory fields

I AM MAKING A SUBMISSION

As an individual On behalf of an organisation

Name of organisation

WOULD LIKE TO MAKE AN ORAL SUBMISSION TO THE CITY COUNCILLORS

Yes No

If yes, provide a phone number so that a submission time can be arranged

021 1458 259
Email me first

Submissions close at 5pm on 4 October 2013.

Fold here first

Fold, fasten and post this form to the Wellington City Council
using the Freepost address below

Fold here second

Freepost Authority No 2199

Absolutely
POSITIVELY
HE HEKE KI PŌHŌKE
WELLINGTON CITY COUNCIL

PO Box 2199, Wellington 6140, New Zealand

CARRIED BY NEW ZEALAND POST 6 1840 01 DEC 13
Free
>>> GOT A QUESTION? VISIT WWW.CO.NZ.PE <<<

Camping Bylaw,
PO Box 2199,
Wellington 6140

Privacy statement

All submissions (including name and contact details) are published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public, as part of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

1. WHICH OF THE FOLLOWING BEST DESCRIBES YOU?

(You can tick multiple boxes)

- I sometimes choose to camp when I travel
- I live near a site used by campers
- I visit sites popular with campers (eg to go swimming, fishing or walking)
- Campers are potential customers of the business I own or work for
- Other (please describe):

2. WHAT ARE YOUR GENERAL VIEWS ON FREEDOM CAMPING IN WELLINGTON?

Comments:

We should welcome campervan tourists more.

3. WHERE IN WELLINGTON DO YOU THINK CAMPING COULD BE ENCOURAGED?

Comments/suggestions:

In the basin reserve - its never used & is highly overvalued

4. DO YOU HAVE ANY SUGGESTIONS ON HOW/WHERE WELLINGTON COULD PROVIDE A PERMANENT CAMPGROUND CLOSE TO THE CITY?

Comments/suggestions:

1) Allow campervans to stay in the parking buildings overnight. (Provide facilities)

2) Have some of the colleges/schools allow their grounds to be parked in overnight - provide power (cable bay) points

5. DO YOU AGREE WITH OUR PROPOSED RESTRICTED AND PROHIBITED AREAS FOR CAMPING?

Comments:

Yes

6. ARE THERE OTHER AREAS IN WELLINGTON WHERE CAMPING SHOULD BE RESTRICTED OR PROHIBITED, OR WHERE YOU THINK WE SHOULD KEEP AN EYE ON?

Comments/suggestions:

7. DO YOU HAVE ANY OTHER FEEDBACK ABOUT THIS PROPOSAL?

Additional comments/suggestions:

Yes - IT DOESN'T MATTER WHAT I THINK OR SUGGEST BECAUSE AT THE END OF THE DAY "OFFICERS" OF COUNCIL GET THEIR WAY. I AM DISAPPOINTED BY OFFICERS, LOOK AT THE BULLSHIT & MONEY WASTED ON DIGGING UP MANNERS MALL, THE MILLIONS OF DOLLARS SPENT ON THE MELLOW YELLOW GOLDEN MILE, THE MILLIONS SPENT ON RUBBISH PROJECTS IN THE CBD, THE RUBBISH OUTLET CENTRE THE (LAP) LEAL ALCOVE PLAN, THE CRAP DISHED OUT TO HILBRIANIE & JOHN ST UPGRADE, THE \$50 MILLION SPENT ON A SILLY ROAD CENTRE (A YES, THE MILLIONS SPENT ON A ROAD FOR THE RUGBY WORLD CUP!) OUR DEBT IS \$380M & RISING, SO THE PAT HAS BEEN BAD BUT IF MERRISON NICOLS AND YOUNG GET INTO COUNCIL, WELLINGTON WILL CATASTROPHICALLY DIE.

Sharon Bennett

From: Wellington City Council [webcentre@wcc.govt.nz]
Sent: Wednesday, 11 September 2013 3:37 p.m.
To: BUS: Policy Submission
Subject: Camping in Wellington - Submission

The following details have been submitted from the Camping in Wellington consultation form on the Wellington.govt.nz website:

First Name: Stephen
Last Name: Mishkin
Street Address: 31 Hicks Crescent
Suburb: Waikanae Beach
City: Kapiti 5036
Phone: 049056004
Email: lydia.mishkin@gmail.com
I would like to make an oral submission: Yes

Phone number for oral submission: 049056004

I am making this submission: as an individual

Organisation name:

1. Which of the following best describes you?

I visit sites popular with campers (eg to go swimming, or fishing or walking), Campers are potential customers of the business I own or work for, as an investor

2. What are your general views on freedom camping in Wellington?

The windfall for Wellington could be as high as \$40million per year. This will never be achieved by the policies that are being put in place by this legislation.

3. Where in Wellington do you think camping could be encouraged?

In an area close to centre of the city or close to easy transport.

4. Do you have any suggestions on how / where Wellington could provide a permanent campground close to the city?

In the last two years i have furnished the council with approx 10 suitable sites. In most cases i have not even had the courtesy of a reply. I spoke at a council meeting in August and was promised to be contacted within a few days, which never happened.

5. Do you agree with our proposed restricted and prohibited areas for camping?

No, the council has its head in the sand.

If the council wishes to encourage the tourism dollar it needs to take a liberal approach.

6. Are there other areas in Wellington where camping should be restricted or prohibited, or where you think we should keep an eye on?

7. Do you have any other suggestions or comments about this proposal?

This should be a simple exercise. I am sorry to say the council is turning it into a major project. It looks very much like someone is trying to ensure their employment for next 10 years.

C

C



New Zealand Motor Caravan Association Inc.

"Execute your'll
never be home
on the road again..."

01 October 2013

Wellington City Council
P.O Box 2199
WELLINGTON 6140



SUBMISSION ON THE DRAFT CAMPING BYLAW 2013

INTRODUCTION

1. The New Zealand Motor Caravan Association Inc. ("NZMCA") appreciates the opportunity to submit on the Wellington City Council ("the Council") Draft Camping Bylaw 2013 ("the Bylaw").
2. We represent the interests of over 50,000 New Zealanders who share a passion for exploring our country at leisure in their motor homes and caravans. Our purpose is to foster and advance the motor caravan movement by providing relevant services and information, promoting fellowship, vehicle safety, road courtesy and protection of the environment. We wish to collaborate with Council to promote responsible overnight parking across Wellington and ensure your camping-related bylaws are consistent with requirements and intent of the Freedom Camping Act 2011 ("the Act") and New Zealand Standard for Self Containment of Motor Caravans and Caravans 5465:2001 ("NZS 5465:2001").
3. Council will be aware that in consultation with Local Government New Zealand ("LGNZ"), the Department of Internal Affairs ("DIA") and the Department of Conservation ("DOC"), we commissioned ChenPalmer public law firm to prepare a model freedom camping bylaw that would help promote the development of consistent, lawful bylaws nationwide. The model is still in draft format as review recent feedback from LGNZ. To date, both the DIA (who administer the Act) and DOC (who wrote the Act) have confirmed they support the bylaw as drafted. Once ready, all local authorities will receive a copy.

SUMMARY & RECOMMENDATIONS

4. **We support** the intent of the bylaw and commend Council for seeking to protect the rights of all New Zealanders to freedom camp (responsibly) as Parliament envisaged. We wish to acknowledge the transparent and consultative approach adopted by Council to address the concerns of various stakeholders prior to drafting the bylaw. We believe this approach provides a model for other local authorities to follow.

Driving towards a Sustainable Future

Freedom to Explore

4 Graham Road Takanini 2112
PO Box 72147 Papakura 2244
E enquiries@nzmc.org.nz

P 09 298 5456
F 09 298 5646
www.nzmc.org.nz

5. **We recommend:**

1. That the bylaw also identifies areas where freedom camping is restricted or prohibited "under other enactments" (clause 12.5) by way of a map and description under a new Schedule 2, and clarifies the relationship between these areas with the Act¹.
2. That Council permits overnight parking (with or without restrictions) in suitable areas currently prohibited under other enactments, e.g. recreational reserves with hard parking nearby transport links.
3. That additional to the maps and descriptions required by section 11(3) of the Act, Council erects signs at identified locations to inform visitors of any freedom camping restrictions and prohibitions.
4. That following adoption of the bylaw, Council continues to work proactively with the NZMCA to promote responsible camping.

AREAS WHERE CAMPING IS RESTRICTED OR PROHIBITED

6. Clause 12.5 permits camping unless restricted or prohibited under a) the bylaw and b) under any other enactment. Readers are referred to the Council website for a list of areas prohibited under other enactments, therefore placing the onus on them to become familiar with the relevant camping-related provisions under each "other enactment".
7. We submit it would be helpful to avoid confusion and encourage compliance if the specific areas restricted or prohibited under other enactments were also appropriately identified within the bylaw. We suggest including a separate schedule for the purpose of providing information only, however not enforced under the bylaw. Visitors to Wellington might assume that unless listed in the bylaw other open spaces permit freedom camping and not bother to check the Council's website, which could create unnecessary tension between campers, communities and Council enforcement officers.
8. We recommend Council, in collaboration with NZMCA, investigates the opportunity for those visiting Wellington in certified self-contained vehicles to park overnight in areas currently prohibited under other enactments, e.g. the Reserves Act 1977 and Reserve Management Plans. For example, there are a number of sports grounds with hard parking that may be suitable for short-term overnight parking during off-peak periods. With appropriate restrictions to manage the necessary protections set out in section 11(2) (a) of the Act, overnight parking could become a permitted/restricted activity where suitable parking exists. This enhances the security and safety of those visiting the area.

¹ At the time of writing this submission we could not locate the list of "other areas" on Council's website referred to on page 9 in the statement of proposal.

If Schedule 2 is added to the bylaw then Council should clarify, for the avoidance of doubt, the camping restrictions and prohibitions that apply to areas under "other enactments" are not revoked, however offence's may be enforced under the provisions of the relevant enactments.

9. In addition to vehicles being self-contained, Council might consider other restrictions adopted by local authorities and the Department of Conservation, including for example:
1. Overnight parking limited to non-peak times during the week;
 2. Defining overnight parking sites within a specific area;
 3. Duration of not more than 3 consecutive nights; and
 4. Restricted entry and exit times.
10. Priority could be given to sites with reasonably open parking areas close to transport and not heavily used during the week. An example is Raroa Park close to the Johnsonville line. Council officers could advise on the suitability of other locations.
11. Many visitors to Wellington will likely be travelling to and from the Cook Strait ferries. We expect Council would prefer these visitors to stay over and visit the tourist highlights across Wellington. Given the absence of low-cost public camping grounds within Wellington City, having a range of overnight parking areas close to transport links other than those restricted areas listed in Schedule 1 would be advantageous and help the NZMCA promote Wellington as a destination to stop over.

PROTECTING THE AMENITY OF AN AREA

12. Within the Statement of Proposal (page 6), Council has stated:

"In some parks and reserves that are not covered by a reserve management plan, it may be necessary to prohibit or restrict camping to protect the amenity of these areas."

[Our emphasis]

13. From this statement, we anticipate some submitters will recommend limiting freedom camping in areas to protect their amenity values. We accept that in certain circumstances it may be necessary to limit freedom camping in order to "protect the area", provided the decision also complied with the provisos under section 11(2)(b) of the Act, i.e. the decision is an appropriate and proportionate way of addressing the perceived problem in relation to that area.
14. The question as to whether or not, or to what degree, amenity values can be protected under the Act is unclear and has not been judicially decided. In the absence of case law to provide guidance we expect local authorities will carefully consider such requests and ensure any decisions comply with the criteria set out under section 11(2) of the Act.
15. If Council considers it necessary to limit freedom camping to protect amenity values, we expect Council to clearly define these values in the local context and describe what elements make up the values or character of the area along with the threats to these from freedom campers². We also expect to be informed if areas are likely to be restricted or prohibited for these reasons, particularly as we have not

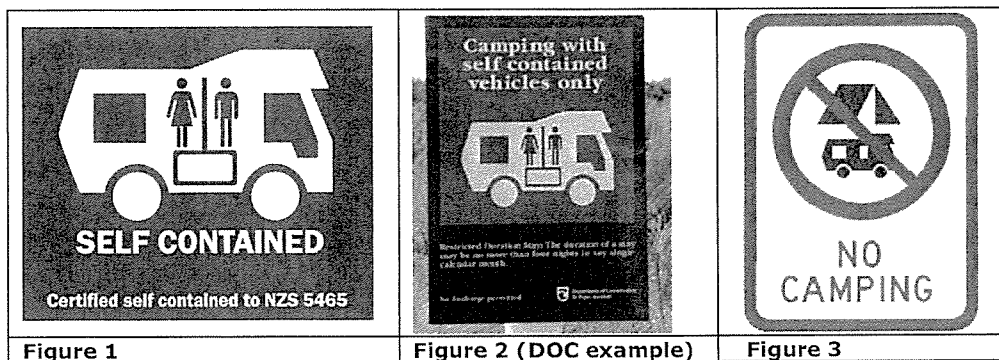
² Leggett, M. (1996). Defining amenity values. *Planning Quarterly September issue*, 4-5.

had the opportunity to discuss such proposals during the consultative process. Informing submitters will ensure consistency with Council’s collaborative approach adopted thus far.

- 16. Again, we accept in some cases it may be necessary for Council to protect amenity values under the Act, however it is important for all affected stakeholders that Council clarifies those values and explains what effects can be expected in order for decisions to remain transparent and not open to judicial review.

SIGNAGE

- 17. Where freedom camping is restricted or prohibited we recommend erecting signs to advise visitors of the specific rules. While signs are not mandatory under the Act they promote compliance when few will be aware of the limitations imposed by the bylaw, not to mention the potential for a \$200 instant fine for unknowingly breaching the bylaw.
- 18. Where freedom camping is restricted to self-contained vehicles we recommend erecting signs that display the standardised symbol for self-containment (see figures 1 and 2). This symbol is recognised in NZS 5465:2001 and was crafted by DOC and local government in 2012 for specific use in public areas where freedom camping is restricted to self-contained vehicles only.
- 19. Where freedom camping is prohibited under the bylaw, we recommend erecting the standardised ‘No Camping’ sign (see figure 3) created by the New Zealand Transport Agency in 2008. Many visitors will be unaware that an area is prohibited and that they may incur an instant \$200 fine for a breach of bylaw.



- 20. If practicable, we recommend providing contact information at the most problematic sites so responsible freedom campers can report problems directly. NZMCA members wish to protect the privilege of freedom camping and support the Council’s efforts to enforce responsible freedom camping.

ECONOMIC BENEFITS DERIVED FROM OUR MEMBERS

- 21. Motorhoming is a rapidly growing lifestyle choice of the “baby boomer” demographic. This is evidenced by the rapid increase in the popularity of motorhomes and caravans and our membership growth over the past 5 years. The majority of NZMCA members are retired/near retirement, mobile and have reasonable discretionary income. Over 50,000 New Zealanders (approx. 26,000

vehicles) are members of the NZMCA. The modern motorhome is on average 7 metres in length, self-contained and equipped for extended holiday travel.

22. A 2012 survey of our members revealed:
1. They spend on average \$78 per day and 75 nights per year holidaying in their vans;
 2. When choosing overnight parking a safe area close to town or area of interest is the overriding consideration;
 3. They prefer to visit areas that provide facilities for motorhomes and are generally motorhome friendly;
 4. The Wellington-Wairarapa area is one of the least visited areas by our members; and
 5. Shopping and sightseeing are favoured activities.
23. Travel between the North and South Island is a substantial migratory pattern over the October – May period. Information provided from the Interislander and Bluebridge report over 30,000 crossings per year.
24. Because of the lack of suitable overnight parking areas in Wellington our members do not generally stopover unless visiting friends and family. Levin, Porirua and the Hutt are typical stopover points to and from the terminal ferries.
25. The provision of safe overnight parking areas close to the city area and/or transport will encourage members to stay in Wellington. Furthermore, it is reported that locations that allow overnight parking suffer less from vandalism and other undesirable social behavior. Visitors provide a low cost security protection for the area. Many clubs, e.g. RSA's and Workingman's Clubs, have formed a close association with the NZMCA allowing members to park overnight for the security it provides to their facilities. This positive benefit is frequently overlooked.

MOTOR HOME FRIENDLY

26. The NZMCA is working with a number of local authorities nationwide to promote their status as being "motorhome friendly". The key criteria to be formally recognised as motorhome friendly is their bylaws conform to the requirements of the Act and they genuinely welcome responsible freedom campers. Wellington City's draft bylaw appears to meet the criteria.
27. Towns and cities with this status are promoted within our membership and the wider fraternity. We encourage our members and other responsible campers to visit these areas and patronise local businesses. The Council may wish to discuss with the NZMCA involvement in this scheme.
28. We would appreciate time to speak to this submission at the hearing.

James Imlach
Resource Management Planner
E james@nzmca.org.nz
M 027 298 5648

Tony Gavin
Policy Adviser – Government Relations
E tsgavin@gmail.com
M 021 249 2157

Submission on Camping provisions in Wellington Consolidated Bylaw**3 October 2013**

I submit that it would be a lot easier to include all of Wellington City as a no camping area except for a few areas where 'freedom camping' might be appropriate. Rather than the current approach to pick a few no camping places where the presumption is that freedom camping is allowed everywhere else. This would make enforcement easier to manage. It is hard to see that the Freedom Camping Act 2011 was intended to allow people to 'free' camp in cities. This is a precedent for anywhere in the world.

I submit that the entire south coast along past Red Rocks should be excluded from 'freedom camping' as it has high natural values for Wellingtonians which would be lost if camping was allowed – including its wild and undeveloped character. The south coast does not have good public transport links to the potential parking spots so would seriously limit who could use it. There are few businesses along the coast that could benefit from tourists.

I submit that 4 nights 'free' is too long and that 2 nights is more appropriate. The NZ Motor Caravan Association states that the standard for self-contained camper vans is to be able to contain 3 days of waste. There needs to be a balance between what services Wellingtonians will fund for 'freedom' campers compared to the benefit to the city – freedom campers have, almost by definition, already decided to avoid spending money on accommodation here.

I submit that freedom camping should be limited to those in self-contained vehicles.

There are current issues with 'freedom' campers in the city and these highlight the difficulty for enforcement. There don't appear to be any enforcement officers currently, and this proposal does not set out who will undertake this role or how it will be funded. Signage and information on prohibition of camping in the Town Belt is inadequate currently – how will people know where to camp? Education won't work on people that are only staying a few days – how will they be educated? This is too much of a relaxed attitude to an issue that has proved troublesome in many parts of the country.

This approach to providing 'free'(rate-payer funded) camping facilities to tourists is unfair to Wellington's homeless people. I would prefer to see the funds necessary to manage 'freedom' camping devoted to solving the issues for homeless people in Wellington. This is a good argument to having very limited 'freedom' camp sites in our district.

What is really needed in Wellington are some properly managed fee-paying camp facilities, this would make Wellington a camper friendly place, provide a business opportunity, and be available to all people. Council as a matter of priority should investigate a proper camp ground.

I wish to be heard in support of my submission.

Ellen Blake, 72 Majoribanks Street, Mt Victoria

windynell@gmail.com

021 106 7139

Sharon Bennett

From: Wellington City Council [webcentre@wcc.govt.nz]
Sent: Thursday, 3 October 2013 11:01 p.m.
To: BUS: Policy Submission
Subject: Camping in Wellington - Submission

The following details have been submitted from the Camping in Wellington consultation form on the Wellington.govt.nz website:

First Name: Bill
Last Name: King
Street Address: 6 Kitchener Tce
Suburb: Johnsonville
City: Wellington
Phone: 9719875
Email: bsking@paradise.net.nz
I would like to make an oral submission: Yes

Phone number for oral submission: 9719875

I am making this submission: as an individual

Organisation name:

1. Which of the following best describes you?

I am a motorhome owner who uses it frequently during the year.

2. What are your general views on freedom camping in Wellington?

Given the number of visitors to Wellington who are in rental or owned self contained motorhomes there is a need for areas close to Wellington city where they can stay overnight.

3. Where in Wellington do you think camping could be encouraged?

The reclamation north of the interisland ferry would be an ideal motorhome stopping place.

Parking areas bordering the town belt.

Overnight stopping in the present carpark between Barnett Street and Waitangi Park. (Cars during the day and motorhomes at night.)

4. Do you have any suggestions on how / where Wellington could provide a permanent campground close to the city?

On the unused reclamation just north of the inter-island ferry terminal.

Anderson Park would be good; close to town and screened from nearby houses. Perhaps this one is unlikely!

5. Do you agree with our proposed restricted and prohibited areas for camping?

I think your proposals are sensible.

6. Are there other areas in Wellington where camping should be restricted or prohibited, or where you think we should keep an eye on?

Not at present but I am sure Council will add any that arise from time to time.

7. Do you have any other suggestions or comments about this proposal?

There is a big difference between the Certified Self-Contained CSC vehicles (motorhomes, campers, campervans, house buses and house trucks) and the vans/stationwagons/cars that people who are also camping and stop overnight in public places. The second group are not self-contained and need toilets.

The Council proposal addresses both types of freedom camper.

Sharon Bennett

**SUBMISSION
NUMBER**

25

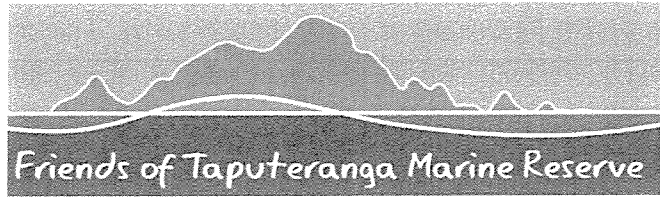
From: Sophie Mormede [sophie.mormede@gmail.com]
Sent: Wednesday, 18 September 2013 7:04 p.m.
To: BUS: Policy Submission
Cc: Rochelle Finlay; Murray Hosking
Subject: Public Input - Camping in Wellington
Attachments: Submission.WCC.camping.Sept2013.doc

To whom it may concern,

Please find attached the submission from the Friends of Taputeranga Marine Reserve on the proposed camping bylaw.

Regards,

Sophie Mormede



Wellington City Council

Submission on the WCC proposal on Camping in Wellington

Thank you for the opportunity to make a submission on the proposed changes to the camping bylaw to help manage camping in Wellington. We commend the Wellington City Council for its proactive approach to the issue. We present our submission following the items on the submission form.

The Friends of Taputeranga Marine Reserve Trust was formed in October 2009 to help ensure that the full range of the Marine Reserve's potential benefits could be realised and to give the community both a voice and an involvement in its future. The initiative for the Trust has come from individuals who have either been involved in the establishment of the marine reserve or who have provided crucial support for it from within the local and wider Wellington communities. The Trustees represent or have had experience in marine science, the local community, commercial and recreational diving, central and local government, conservation and marine users.

The Trust works closely with the Department of Conservation and the other groups or individuals with a major stake in the marine reserve, including the community.

We would like to present an oral submission.

1. Which of the following best describes you?

We visit, care for and are involved with sites popular with campers, particularly the south coast of Wellington around the boundaries of the marine reserve, and with related South Coast sites for diving and snorkelling.

Campers are also potential "customers" of the Taputeranga Marine Reserve, in that they might be coming specifically to experience the marine reserve. We anticipate that this phenomenon will only increase, following the example of Leigh Marine Reserve. It is a process that is best anticipated and planned well in advance.

2. What are your general views on freedom camping in Wellington?

We believe it should be limited to areas where public toilets are available, and be forbidden in all other areas. That includes the entire of the road on the south coast and around the harbour, and parking sites such as the baithouse in Island Bay, the snorkel trail in Island bay, Moa point, Tarakena Bay, Wahine Memorial point, Breaker bay, Mahanga Bay, Kau Bay, Shelly Bay. We would also note that camper vans with on board toilet facilities tend to be on the large side, and take up a lot of parking space.

Moreover, it should be limited in areas where there is a high demand for parking to access amenities such as beaches or swimming / snorkelling points. These include Princess Bay or Scorching Bay for example where car parking can already be an issue on sunny summers days. It has already been highlighted in Balaena Bay. In those places, either limiting the area allowed for camping or allow camping from 4pm only (but that could be hard to enforce).

With specific regards to the Taputeranga Marine Reserve, freedom camping is either forbidden or strictly controlled on NZ's land-based reserves (e.g. national parks). We believe that the same rule should be applied to marine reserves, with freedom camping forbidden along the entire coast of the Taputeranga Marine Reserve.

3. Where in Wellington do you think camping should be encouraged?

We believe camping should be encouraged in areas where adequate public toilets are available, whilst ensuring that some space is reserved for day users. We note that there is no suggestion of designated camping sites in or near the city, and that you are proposing to disestablish the site on the waterfront at Queen's wharf.

4. Do you have any suggestions on how/where Wellington could provide a permanent campground close to the city?

There is clearly a demand for overnight camping, whether prior to or after using the Interislander ferries, as well as to enjoy what Wellington has to offer. This needs to be able to provide for camper vans and tent campers if the full range of visitors is to be catered for. Ideally any space set aside for the purpose should allow for security and proximity to the main Wellington attractions, provided with adequate facilities, and be on the bus routes. It is suggested that commercial providers of camping facilities should be explored, perhaps in association with the WCC Open Spaces planning, although this may not be classed as 'Freedom Camping'.

5. Do you agree with our proposed restricted and prohibited areas for camping?

6. Are there other areas in Wellington where camping should be restricted or prohibited, or where you think we should keep an eye on

Both these questions are answered together, as we look at driving principles to the decision.

As expressed in point 2, we would like the entire coastal road network (including the harbour) prohibited, just like Owhiro Bay Parade. This would include the Esplanade, Queens Drive, Lyall Parade (although there are toilets there, so some restricted camping would be possible provided there is enough parking for day users), Moa Point road, Breaker Bay road, around the Miramar peninsula, and into Evans Bay road back to the city.

We would also like to see all coastal parking areas with no toilets be made prohibited areas. These include but are not limited to the Baithouse car park in Island Bay, the Snorkel Trail car park east of Island Bay, the Tarakena Bay car park, Wahine Memorial park, Breaker Bay car park, Kau Bay car park.

As a Trust, we have taken a particular responsibility for the car park at the Snorkel Trail, and its surrounds. Apart from the annual September South Coast Clean Up, the Friends have been involved in similar clean ups just for the area between Elsdon Point and the Baithouse. Some of our members make regular rubbish removal a personal contribution to the purpose of the Trust. We are well aware of the rubbish that is dumped at this site, both casually and specifically as an alternative to a few extra kilometres to the Happy Valley Landfill, as well as debris arriving with the tide. Toilet rubbish is especially hard to deal with, as well as fish trunks and shucked paua shell. Regular use by campers would simply add to the problem. While the majority of campers are responsible, it is the few who ruin it all for the majority. We would like to see the same restrictions apply, and for the same reasons, as Balaena Bay at both the Trail and the Baithouse.

We would also like some protection of the highly used areas, in particular Princess bay / Te Raekaihau point and Scorching Bay, which can be full of cars and people on any sunny weekend days. Alternative schemes could be to only have half those areas available for camping, or for camping at weekends, or no camping parking before 4pm, although this could be difficult to enforce. The Snorkel Trail car park should also be prohibited for this very reason: it is full on a regular basis throughout the year as a base for snorkelers and divers, and has limited capacity for all current users.

7. Do you have any other feedback about this proposal?

Camping in general and freedom camping in particular can have strongly detrimental visual and environmental effects, and be very unpopular among the community, as has been demonstrated nationally and overseas. As camping grows in Wellington, and with the new bylaw, WCC will need more staff with enforcement powers to actively patrol the empty spaces and car parks every day, and at various times of the day. Has WCC recognised and budgeted for the cost of these additional staff in their proposal?

We commend the Council for taking a proactive approach to what is likely to be an increasing problem.

We hope the points raised above will be taken into consideration when reviewing the proposed camping bylaw.

For Rochelle Finlay
Chair
Friends of Taputeranga Marine Reserve Trust

www.taputeranga.co.nz

Contact us via enquiries@taputeranga.org.nz

Sharon Bennett

From: Wellington City Council [webcentre@wcc.govt.nz]
Sent: Friday, 4 October 2013 2:37 p.m.
To: BUS: Policy Submission
Subject: Camping in Wellington - Submission

The following details have been submitted from the Camping in Wellington consultation form on the Wellington.govt.nz website:

First Name: Hubertus
Last Name: Buyck
Street Address: 26 View Road
Suburb: Houghton Bay
City: Wellington
Phone: 043874069
Email: huibbuyck@yahoo.com
I would like to make an oral submission: Yes

Phone number for oral submission: 0276464674

I am making this submission: as an individual

Organisation name:

1. Which of the following best describes you?
I live near a site used by campers

What are your general views on freedom camping in Wellington?

Camping, whether by tent or campervan provides a cheap form of self contained accommodation with a great degree of mobility and independence. The attraction of freedom camping is that there is an absence of cost to the user (but not provider of the service), overcomes shortage of availability of commercial or DOC maintained sites and does not require advance booking to secure the site. However there are also considerable downsides to freedom camping. Freedom camping does incur a direct and indirect cost to the community and the council, such as maintenance of the campsite, disposal of sewerage, provision and maintenance of toileting facilities, rubbish collection, environmental damage as well as potential legal liabilities from use of the site. Furthermore, the presence of freedom campers will deter use of the site by local residents or day visitors due to use of available car parks, obstruction of access, pollution of the site or simply deterring visitors reluctant to intrude on a person's campsite.

Campervans are particularly popular for overseas visitors and many frequently transit through

Wellington to and from the South Island. The current Wellington Waterfront Campervan Park is a useful and heavily utilized facility with all 37 sites frequently occupied. The location within the central city is ideal, allowing campers to walk directly into the city, contributing to the local economy, and is generally highly rated by visitors. Other commercial sites for camping and motorhomes within Wellington city are limited, with Rowena's Lodge in Mt Victoria providing a small number of tent sites and berths for 2 small campervans within the central city, and Capital Gateway Motor Lodge provides 27 powered sites and sewerage dump in Ngauranga Gorge, 7 minutes from the ferry terminal. DOC maintains a restricted access camp site on Matiu/Somes Island but otherwise the nearest DOC maintained campsite is Catchpool which is at least 45 minute drive from Wellington city. Camping grounds are available in Porirua and the Hutt Valley.

Permitting Freedom Camping at a few restricted sites on the south coast does not address the lack of Campervan facilities that will result from closure of the waterfront Campervan Park.

3. Where in Wellington do you think camping could be encouraged?

The council should reverse the decision to close the Wellington Waterfront Motorhome Park, or find an alternative central city site for campervans. With regard to those that prefer to camp, including use of tents, there are a considerable number of large open spaces in Wellington that would be much more suitable for camping. It would be possible for Wellington City Council to permit freedom camping at other sites within the city, such as Makara, Ohariu Valley, Happy Valley and Strathmore Park. Alternative coastal campsites include Seatoun, which has extensive parking capacity and toilet facilities but is a less environmental sensitivity site. Many parts of the green belt would also be suitable to be considered for camping, again without significant adverse environmental impact.

4. Do you have any suggestions on how / where Wellington could provide a permanent campground close to the city?

Increasing the number of commercial camping and motorhome sites within Wellington would provide a useful service that would decrease the demand for free camping sites with the attendant cost to the council and the community whilst potentially increasing visitor largely want to see the city itself and would have the potential to generate increased economic activity. The key point here is that visitors to Wellington want to see the city in the main so that residing in it best serves that purpose. Perhaps the council could invite expressions of interest from local property owners and assist in creating a proper campground with ablution blocks, as well as kitchen/laundry facilities and rubbish collection. Wellington city council could approach local providers of backpacking and other accommodation with attractive offers that might entice the providers to make suitable parking/camping space available if possible. Even if only as few as two such spaces can be provided by a number of providers across the city this would improve provision of camping facilities.

5. Do you agree with our proposed restricted and prohibited areas for camping?

I oppose the proposal to permit restricted camping at Te Raekaihau Point and Princess Bay on the following grounds.

The proposal will overload the parking at the two sites where freedom camping will be permissible. These sites are key sites used by many people for a wide range of Wellingtonians and visitors to engage in a range of recreational activities, such as swimming, snorkeling, diving and exploring the rock pools. As outlined in section 2 of this submission, there is limited availability of commercial

campsites within Wellington City, and by restricting freedom camping to only two sites (Te Raekaihau Point/Princess Bay and Owhiro Bay) this will result in large numbers of campers converging on the only permissible sites for such camping within Wellington, potentially overwhelming the sites and preventing access for other visitors. The closure of the current Camper Van Park on the waterfront, which has 37 sites and the ban on freedom camping at Balaena Bay, will mean a massive increase in demand for camping sites and exceed the parking capacity at Te Raekaihau Point and Owhiro Bay, leaving no space for other visitors. No projections are provided by the council on the total number of Freedom Campers expected to use the permissible sites but Dominion News 26/1/13 reported up to 25-30 campers were frequenting Balaena Bay before Freedom Camping was banned from this site. Princess Bay is an extremely popular and safe beach in the summer, particularly for families and young children but large numbers of campers will prevent access to the beach by day visitors, denying access to the site for a far larger number of people.

The proposed sites are supposed to make it easier for people in campervans and other vehicles to stay overnight in Wellington, however the sites are wholly unsuitable for this purpose as they are both in the most southerly part of Wellington City, the ferry terminal and the northern motorway. Both sites are a considerable distance from the central city, so campers would be unable to visit the central city without alternative transport. There are no obvious economic benefits to the city of visitors staying on these sites to offset the increased cost to the council of maintaining the sites. The sites are wholly unsuitable for tents, which are also included in the Freedom Camping Act.

The proposal has significant environmental impacts that have not been appropriately evaluated. Owhiro Bay, Te Raekaihau Point and Princess Bay are all environmentally sensitive sites. Owhiro Bay and Princess Bay are within the Taputeranga Marine reserve. Te Raekaihau Point is an ecologically vulnerable site that has received funding from the Charles Plimmer Bequest of \$350,000 in 2009 for ecological rehabilitation work with the aim of restoring the degraded beach and headland, increasing the number of nesting penguins and other shore birds and provide a habitat for skinks and geckos. The impact of the current proposal to direct freedom campers to Te Raekaihau Point and Princess Bay would increase the environmental damage resulting from increased trampling of the fragile sand dunes and greater pollution, and undermine the aims of the Te Raekaihau Point ecological rehabilitation plan. According to the Freedom of Camping Act, camping would be permissible within 200m of the low water mark, so would mean the council would not be able to prevent tents or temporary structures being erected directly on the sand dunes which would be highly destructive to the site. Open fires are not permitted at the site without permit, and the risk of fire is considerably increased if freedom camping is permitted, particularly with the easy availability of driftwood from the beach. Furthermore, dogs are not permitted on the beach at any time, making the site unsuitable for campers with dogs. The \$200 fine for offences committed under the act are unlikely to act as a significant deterrent for inappropriate waste disposal and will be almost impossible to enforce as the sites are isolated and not monitored.

Current waste collection facilities are inadequate to allow freedom camping. Although toilet facilities are available at the site, if overnight camping was permitted at the site, the council would need to be responsible for maintaining 24 hour access to toileting facilities seven days per week, as well as cleaning and providing availability for round the clock access for emergency repairs, to prevent

pollution to the site by human waste. In addition, as the proposal suggests campers may stay a maximum of four days, this exceeds the waste storage capacity of most campervans, but at present there are no sewerage disposal facilities available in the south coast (nearest dump facility is Ngauranga Gorge). If no dump facilities are provided, it is likely human waste will be dumped in the environment with the attendant risk to the health and welfare of local residents and visitors. Rubbish collection facilities are also currently inadequate, and local residents voluntarily collect large quantities of rubbish from the coastline, the volume will only increase if freedom camping is permitted at these sites, potentially overwhelming the ability of locals to maintain the site.

6. Are there other areas in Wellington where camping should be restricted or prohibited, or where you think we should keep an eye on?

7. Do you have any other suggestions or comments about this proposal?

The local Houghton Bay community values the natural beauty and environmental welfare of the south coast. They played an active role in lobbying against the proposed building of a marine education center on Te Raekaihau point, which was subsequently thrown out by the Environmental Court in 2007.

Since that time, residents have played an active role in maintaining and restoring the area, through groups such as Te Raekaihau Coast Care, View Road Reserve Planting Group, Cave Road Planting Group and simply the spontaneous action of many local residents in keeping the south coast clear of rubbish, and the proposal will impact on these activities. Locals are concerned about the impact on plantings if Freedom Camping is permitted as well as impact on the nearby View Road South Headland reserve which can be accessed via a track from Te Raekaihau Point. If freedom camping is permitted at Te Raekaihau Point, the council needs to consult local groups on the impact of this activity to ensure that it does not have an adverse impact on the local environment and welfare of the community. Some suggestions that may mitigate the negative impacts of freedom camping include restricting camping to only part of the point, such as designated camper van bays. This would reduce total numbers

and ensure Wellington residents and their children continue to have access to Princess Bay beach including parking facilities.

In sites where the council does permit Freedom Camping, it is recommended clear signage is erected detailing any constraints and restrictions, as well as the penalties for infringements of the Freedom Camping Act, and contact numbers to report any breaches.

If freedom camping is permitted at any site, it is recommended this be for a trial period, with a review process after 6 or 12 months, to ensure there are no adverse effects on local residents or other users of the facilities.

The council also need to clarify what monitoring will be put in place and by whom to prevent cumulative environmental deterioration and damage, otherwise as already outlined in point 5, camping has a significant potential to substantial and costly environmental deterioration and damage.



WATERFRONT WATCH INC

PO Box 19045, Courtenay Place, Wellington

Founded in 1995

waterfrontwatch@xtra.co.nz

6149

1st October, 2013

Camping Bylaw,
P O Box 2199
Wellington 6140

Name, Address contacts etc.

Waterfront Watch Incorporated
P O Box 19045, Courtenay Place
Wellington 6149
Email: waterfrontwatch@xtra.co.nz
Phone: Contact Pauline Swann 4728417

This submission is on behalf of Waterfront Watch Inc and we wish to be heard.

We would agree with the statement from Council page in the Dominion Post referring to consultation on the Camping bylaw which said **“More visitors than ever are choosing to travel by campervan and we want Wellington to be a welcoming city when they arrive”**

At a forum held in Council Room 1 on Thursday 1st November, when Waterfront Watch was represented on the panel, it was very obvious from comments from the floor that the Campervan Park on Kumutoto/North Queens Wharf was providing a destination much needed in the city and with the current provision of toilets and shower blocks, this site could be very much improved with the provision of native plantings, seats and the suggestion of an “Adult playground” during consultation on suggestions for Sites 8, 9 and 10. There were many other supporters and would like to quote from one of our members who said “Wellington is reliant on tourism and the current campervan park adjacent to the Cook Strait ferry terminals presently provides a unique facility for travellers.” There were many similar recommendations in this consultation, including that an Information/Visitors centre should be included to welcome the Cruise Ship visitors.

We would refer you to an article in the Dom/Post 7th December 2012 under the heading **“Campervans pulling in the Tourist cash”**. It says that most international campervan tourists come from Australia, followed by Britain, Germany and the Netherlands. The Germans and the English really see New Zealand as a touring destination and they are prepared to park up somewhere, have a cup of tea/coffee and enjoy the environment and the sights. What better place than this site, close to the Railway station, bus depots, Parliament, Cable Car, Lambton Quay, East/West ferry, Academy of Fine Arts, Portrait Gallery, Museum of City and Sea and Te Papa all very walkable.

We would also like to refer you to the Strategy and Policy Committee meeting 20th June 2013 Report 5 – Vehicle-Based Camping in Wellington – Opportunities and Management.

On Page 2 - **How can we encourage visitors – second paragraph.**

Officers have been approached by some parties interested in developing opportunities for paying campers. Wellington generally lacks opportunities for campers, including low cost sites for both campervans and tents. Aside from the TEMPORARY Waterfront site (2) (not expected to be available beyond summer 2013/14) the next closest sites with reasonable reviews are in Porirua, and Lower Hutt. These sites have been mentioned to us by visitors (especially New Zealanders) who on arriving from either the south or north do not stopover in Wellington city.

Two very good examples are cited in this report of the 2005 Lions Tour and Rugby World Cup and currently with the WOW show on at the Event Centre the Campervan park is in great demand. (see attached photographs – taken last weekend in September)

On Page 4 - **Vehicle-based camping**


Compared to other tourists, campervans tend to travel more widely, stay longer and spend more money on a wider range of goods and activities. Domestic and International tourists travelling the country by campervan spend \$500 million per year and an average of \$200 per night. A total of 138,124 adults travelled in campervans in 2011, 21,347 New Zealander residents and 116,776 international visitors.

We would refer you to another consultation document “Wellington 2040 - Help develop a 30 year framework for Wellington’s central city – October 2009.

Page 4 – Wellington has a fantastic harbour setting, capital city status and is compact and well designed. Page 8 – As the central city grows we need to consider (a) the role and purpose of the waterfront and the activities it accommodates. (b) whether the waterfront should retain its own distinct identity. (c) what future demand will there be on the waterfront.

Finally, surely it is easier and more visitor friendly now that the current site has become well known, to retain this campervan park where it is, than to relocate campers to a series of smaller locations spread throughout the city.

Yours sincerely


Pauline Swann and committee
Waterfront Watch Inc

