

# Council Briefing Agenda

Date: Tuesday, 9 February, 2021

**Time:** 10:30 am

**Location:** Council Chamber

Forum North, Rust Avenue

Whangarei

Elected Members: Her Worship the Mayor Sheryl Mai

(Chairperson)

Cr Gavin Benney
Cr Vince Cocurullo
Cr Nicholas Connop

Cr Ken Couper
Cr Tricia Cutforth
Cr Shelley Deeming
Cr Jayne Golightly

Cr Phil Halse
Cr Greg Innes
Cr Greg Martin
Cr Anna Murphy
Cr Carol Peters
Cr Simon Reid

For any queries regarding this meeting please contact the Whangarei District Council on (09) 430-4200.

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# 2. Reports

2.1. Freedom Camping Consultation Update

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# 3. Closure of Meeting



# 2.1. Freedom Camping Consultation Update

Meeting: Council Briefing

Date of meeting: 9 February 2021

**Reporting officer:** Vita Strohush (Strategic Planner – Bylaws)

Tony Horton (Manager – Strategy)

## 1 Purpose

- To report on the feedback received through consultation on the proposed amended Camping in Public Places Bylaw.
- To provide Elected Members an overview of draft staff recommendations, based on analysis of submissions received against the requirements of the legislation.

## 2 Background

The Statement of Proposal for amendment of the Camping in Public Places Bylaw was adopted for public consultation on 22 October 2020. Public consultation was carried out from 27 October to 26 November 2020. At close of the consultation period Council received 207 submissions including one petition with 13 signatures. A formal Hearing was held on 8 December 2020 where 23 people addressed the Council in support of their submissions.

This report provides an overview of consultation activities, numbers and types of feedback received as well, as a summary of submitter feedback. A further report to Council outlining the trends and statistics for the current summer season is currently being compiled.

#### 3 Discussion

#### 3.1 Key consultation themes

Overall, the proposed bylaw changes received support through consultation. Self-containment remained a dividing issue, as was seen also in the earlier survey Council carried out in June 2020.

Attachment 1 contains a table with 168 area specific feedback points made by submitters along with draft recommendations for each specific area for the amended Camping in Public Places Bylaw. Staff are seeking feedback from the Elected members on any relevant matters provided in the attached draft recommendations.

A high-level summary of key consultation themes is provided below:

- Support for seasonal restrictions on freedom camping at proposed designated sites.
  - 14 submissions in support of seasonal restrictions
  - 8 oppose
  - 8 submitters asking for seasonal restrictions on all beaches
  - Residents and ratepayers groups and NZMA supportive of seasonal restrictions

- Limited feedback on peak season overflow camping sites at Onerahi Sportspark and Tikipunga Sportspark
  - 9 support
  - 4 oppose
- Self-containment a dividing issue.
  - 21 submissions requesting that only self-contained vehicles be allowed
  - 17 submissions opposing the use of the self-containment standard and referring to the Bill of Rights
    - Staff advice is the self-containment Standard is widely used by councils throughout New Zealand and the use of the Standard by reference in the bylaw is well within Council's powers under the Freedom Camping Act to regulate freedom camping to protect areas and safeguard human health and safety.

#### Numerous out of scope requests

- 15 submitters requesting provision of facilities or infrastructure
- 13 operational matters including enforcement and signage
- 5 requesting parking for large motorhomes
- 7 submissions falling under a range of other areas, including concerns about cost to ratepayers

#### • Area specific comments

- Whananaki North 20 submissions. (This is discussed in detail in section 4.1 of this report.)
- Ruakaka 10 submissions. Six submission were received in opposition to a new
  designated site at the Ruakaka Riverside Reserve, citing competition with the
  nearby campground and the use of the reserve by locals. Three submissions
  were received in support of the proposed reduction of the designated site at
  Ruakaka Beach Reserve.
- Ocean Beach amendment to maps requested. (This is discussed in detail in section 4.2 of this report.)
- Otamure Bay amendment to maps requested. (This is discussed in detail in section 4.2 of this report.)

Submitters sought prohibitions on camping in various new areas (13 new areas - details are provided in Attachment 1 under "General areas"). The staff recommendation based on analysis of these submissions against the requirements of the legislation is to continue regulation under the general rule as there is not sufficient empirical evidence to warrant prohibitions on freedom camping in these areas. For completeness of analysis staff would like to draw attention to the following areas in particular:

 Matapouri Estuary – 1 submission seeking to prohibit freedom camping. The Statement of Proposal identified this area experiencing ecological damage from vehicles disturbing fragile dunes. However, this damage cannot be attributed solely to freedom campers. It was considered that the planned installation of bollards will resolve the problem of all types of vehicles disturbing the dunes (not just vehicles used in freedom camping). As physical works would resolve the problem no further regulation is proposed. The improvements at Matapouri Estuary area are underway after consultation with the local hapu.

Pacific Bay – 6 submissions requesting a prohibition on camping. Submitters are concerned that the proposed seasonal restrictions at Kowharewa Bay and Whangaumu Bay would cause campers to move to Pacific Bay. However, Pacific Bay is already regulated under the general rule whereby camping is only allowed in self-contained vehicles and for a maximum of 3 nights. Vehicles must be legally parked and comply with conditions of camping under clause 6 of the Bylaw. It is therefore recommended that no further changes are made to this area.

# 4 Further changes to the bylaw

Feedback received through the formal consultation process highlighted the need for some further changes to specific areas:

- Whananaki North
- Otamure Bay
- Ocean Beach

#### 4.1 Whananaki North

#### **Submissions feedback summary**

Council received 20 submissions in relation to the Whananaki North designated site. Of those, 11 submitters requested a prohibition on camping and 7 requested a seasonal restriction. Submitters provided reports of campers using toilets for washing dishes and showering which adds pressure to already busy facilities. With toilets often busy there are reports of people urinating in the estuary and leaving human waste in the reserve. Concerns were raised about hygiene, water quality, environmental damage to the estuary and human waste on the reserve. Submitters advise the designated site is often overcrowded.

#### Staff comment

Space in this designated camping site is limited. The area, especially the grassy portion, gets very soft in wet conditions. To improve ground conditions and vehicle safety the carpark has been graveled in 2018 and this led to a reduction of the size of the carpark. Safety and vehicle maneuvering requirements mean the carpark can accommodate a maximum of two large vehicles. An updated site map was included in the Statement of Proposal showing the reduced size of the available site.

The local community seeks greater restrictions in Whananaki North than what was proposed in the bylaw. Submitters reported human waste on the reserve, overloaded toilet facilities, toilets used for washing dishes and showering. While competition with commercial campgrounds is not able to be taken into account when setting bylaw restrictions on camping, breaches of the Bylaw have received particularly strong disapproval from the local community specifically because there are three large established campgrounds in the area.

Statistics on vehicle counts and enforcement for Whananaki were not included in the initial analysis. The area is remote and difficult to enforce and was not included in the intensive monitoring programme in the 2019-2020 season and the Responsible Camping Ambassador

Programme. As a result, we were not able to collect camper numbers and compliance statistics for Whananaki North during 2017-2019 seasons.

Given the limited quantitative data, community feedback is valuable. Submitter complaints about human waste and fouling related overwhelmingly to the designated site. By contrast, the reserve by the school and the boat launching layby area nearby (opposite 2249 Whananaki North Rd) are not attracting complaints. This suggests that the designated site by the public toilets in Whananaki North has created unintended consequences by attracting unsustainable numbers of campers to one location with limited facilities. Enforcement contractors do what they can to deal with non-compliances, but the problem cannot be satisfactorily managed by enforcement action alone.

The existing and proposed bylaws restrict freedom camping at Whananaki North. However, analysis against the legislation found that there is not enough enforcement data to justify a full prohibition on camping or a peak-season ban in response to submissions. Largely, submitter feedback is centered on the effects of non self-contained camping (human waste, doing dishes in the toilets, etc.) particularly where the designated site is acting to attract campers. One approach to address this would therefore be to remove the Whananaki North designated site from Schedule 4 and default to the general rule in clause 6 of the Bylaw. The general rule offers a less restrictive regime and allows freedom camping in self-contained vehicles for up to 3 nights, however this option would best address the health and hygiene concerns.

Potential options for Whananaki North are presented in the Table 1 below.

	Whanan	aki North		
Option	Advantages	Disadvantages	Staff comment	
Option 1 (Statement of Proposal)  Retain area in Schedule 4.  Amend the map for the area to reflect the reduced capacity of the carpark after graveling. Specify maximum two large vehicles in the gravelled carpark. Designate the location of the tenting area on the map (as was done for Tamaterau) to provide clarity to campers and protect access to picnic tables.	An amended map can assist to inform campers about the limited capacity of this site.	Does not resolve the issue of fouling and human waste and subsequent environmental impacts.  Prescriptive restrictions remain difficult to enforce in a remote area.	Carpark has been graveled in 2018 to improve vehicle safety. The size of the designed site has already been reduced by Council resolution on 27/09/2018 following community feedback and to protect access.	
Option 2  Close the designated site at Whananaki North and remove the area from Schedule 4. The area to be regulated under the general rule.  The general rule allows only self-contained vehicles to stay for up to 3 nights, compared to only 1 night currently in the designated site.	Option 2  Close the designated site at Whananaki North and remove the area from Schedule 4. The area to be regulated under the general rule.  The general rule allows only self-contained vehicles to stay for up to 3 nights, compared to only 1 night currently in the designated  This option resolves the unintended consequences of the designated site attracting unsustainable numbers of campers.  Self-contained vehicles can still camp for up to 3 nights.  Any camping vehicles would still have to comply with parking bylaws and general		Staff recommendation is Option 2 – regulate the area under the general rule.  The reason for this recommendation is this is considered to be the best way to address consultation feedback that there has been human waste in the reserve and estuary. This is also the least restrictive option to address the perceived problem of fouling and waste on the reserve.	
Option 3	A seasonal restriction would be in line with requests by	Without independently verified evidence of	There is not enough monitoring/enforcement data	

Retain area in Schedule 4 and introduce seasonal restrictions. Camping to be restricted to outside the peak season (which runs from 18 December to 08 February).	submitters to address the issues of overcrowding and human waste during peak season when toilet facilities are under most pressure.  The seasonal restriction at this site is not considered overly detrimental to self-contained vehicles who can utilise many other locations in the District for three nights.	overcrowding there are risks in imposing seasonal restrictions.  Tenting spaces and two non self-contained vehicle camping spaces will be lost during peak season.  Prescriptive restrictions remain difficult to enforce in a remote area.	to verify reports of overcrowding to justify a peak-season ban.
Option 4  Prohibit area to freedom camping	A prohibition on camping would be in line with submitters requests to ban freedom camping in Whananaki.	A year-round prohibition on camping requires a much higher level of evidence of the perceived problem. Imposing a prohibition without sufficient evidence carries risk of challenge.  Defining the boundaries of the new prohibited area would be challenging, as the road reserve extends the whole length of the estuary back to the school.	There is not enough enforcement data to justify a full ban, especially during off-season.

The staff recommendation is **Option 2** – close the designated site and regulate the area under the general rule.

#### 4.2 Further map amendments

Submitters suggested some minor map changes for Otamure Bay and for Ocean Beach.

At **Otamure Bay** it is proposed to extend the prohibited area to cover the entire WDC reserve down to the beach. This option is not materially more restrictive than the original proposal in the SOP as vehicle access to the beach is already controlled by a DOC operated gate and vehicles are prohibited on the dunes. The Department of Conservation have agreed to this proposed change.

At **Ocean Beach** it is proposed, as per submitters' request, to extend the boundaries to the prohibited area to the edge of private property. This change will provide more clarity to campers and enforcement officers. The Parks and Recreation department are supportive of this change.

The proposed updated maps are provided in Attachment 2.

### 5 Next steps

Deliberations on the proposed amended Camping in Public Places Bylaw are scheduled for 16 February 2021. Depending on the outcome of deliberations, adoption of the bylaw is planned for February or March. Implementation of the bylaw would be coordinated with the Health and Bylaws department during off-peak camping season.

#### 6 Attachments

- 1. Draft recommendations by area for the amended Camping in Public Places Bylaw.
- 2. Draft amended maps for Otamure Bay and Ocean Beach

# Attachment 1 – DRAFT Camping in Public Places consultation feedback analysis and recommendations by area

#### Schedule 1

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
1	Abbey Caves	2x support	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	Prohibit area to camping	No change. Maintain current regulation under the general rule.	N/A	Option 1 as per SOP.  Protect access to one of Whangarei's iconic destinations. Supported by submitters
1	Bland Bay Reserve	1x support prohibition and seek to extend prohibited area to the reserve on Bland Bay beach to protect access to the reserve and BBQ tables	Prohibited to freedom camping	No change - retain current prohibited area under Schedule 1	Expand the prohibited area	N/A	Option 1 - no change.  Camping is already prohibited along the grass verge of the road reserve. The rest of the area towards the beach is a recreation reserve and camping on the grass is already prohibited in reserves. Staff advice is the current controls already provide appropriate and proportional regulation.
1	Drummond Park Scenic Reserve (Parihaka Lookout carpark)	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Eliott Reserve	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Finlayson Street/ Reyburn House Lane carpark	1x support 3x oppose  At the Hearing concerns were raised about equal access for all types of vehicles. Some wish to stay in the town basin to access jobs in town.	Schedule 2 – designated site for self-contained vehicles, 3 nights maximum.	Prohibit area to camping	Maintain current regulation under Schedule 2, with a designated site for SC and NSC vehicles.	N/A	Option 1 - prohibit area as per SOP.  Protect access for events and reconfiguration of the waterfront area. Whangarei Events Strategy 2019-2024 directs a focus on large events at the Town Basin and on the Hātea Loop. Alternative motorhome parking proposed at the nearby Riverside/Hatea East carpark. Council is exploring avenues to promote a variety of living options in town.

Schedule	Area	Feedback summary	Current bylaw	Option 1	Option 2	Option 3	Recommendation
				(as proposed)			
1	Helena Bay	4x support 1x oppose	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	Prohibit to camping to protect the area and to protect health (sanitation).	Retain area under the general rule	N/A	Option 1 - Prohibit to camping as per SOP.  Proposal received support through submissions.  Option provide for clarity of enforcement in a remote area.
1	Herekino Street - service lane and carpark behind 4- 22 Herekino Street	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  Issues in this area have been minimal since the area had been made prohibited in 2017. No opposition through submissions.
1	Hikurangi Sportspark	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Hora Hora Sportspark	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Kamo Sportspark	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Kensington Park	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Koropupu Community Sportspark (Springs Flat)	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Langs Beach - Cove Road beach access and carpark area	1x support current prohibition 1x opposes prohibition, seeks to allow self-contained freedom camping max 2 vehicles in marked spaces for 1 night	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	Create a designated site and impose restrictions on camping	N/A	Option 1 - no change.  Busy beach access via small reserve. The prohibition on camping is needed to protect access.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
1	Mander Park	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Marsden Point Wharf	Nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Matapouri - Morrison Road carpark	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	McAuslin Road, Sandy Bay	6x support 1x oppose 1x out of scope - re DOC land	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	Prohibit to camping to protect public safety and access	No change. Maintain current regulation under the general rule.	N/A	The change proposed in the SOP received strong support through submissions.  For detailed feedback see Attachment 2.
1	McLeod Bay - playground and reserve area	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	McLeod Bay – Stuart Road, all road reserve	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Morningside Sportspark	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Moureeses Bay	Nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
1	Ngunguru School	15x support the proposal 1x oppose	Prohibited to freedom camping	Extend prohibited area	No change. Maintain current restrictions.	N/A	Option 1 - Extend prohibited area as per SOP.  The change proposed in the SOP received strong support through submissions.  For detailed feedback see Attachment 2.
1	One Tree Point Road layby	3x support	Prohibited to freedom camping	Prohibit area to camping	No change. Maintain current regulation under the general rule.	N/A	Option 1 - prohibit area as per SOP.  Prohibition on camping in the area is needed to protect health and safety. Shortly beyond the two wire fences there is a sizeable drop.  Campers at risk of falling over the cliff.
1	Onerahi Beach Reserve – between Cliff Street and Johnson Street	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Onerahi Sportspark	1x oppose - taking business from commercial campgrounds that are already impacted by covid	Prohibited to freedom camping	Designate as a peak- season overflow site for self-contained vehicles only from 18 December up until Northland/ Auckland Anniversary Day and when Sportspark is not being used for sporting activities.	Retain as a prohibited area under Schedule 1	N/A	Additional 9 general submissions supported overflow camping sites, and 4 submissions opposed it. On balance, allowing peak season overflow camping is seen as a reasonable approach to help alleviate pressure at coastal areas. Competition with commercial campgrounds is not one of the criteria that can be taken into consideration under the FCA.
1	Otaika Sportspark	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.

Schedule	Area	Feedback summary	Current bylaw	Option 1	Option 2	Option 3	Recommendation
				(as proposed)			
1	Otamure Bay	2x support – prohibit camping on the entire WDC reserve down to the beach (map attached).  1x oppose - self-contained vehicles don't want to pay for a facilities which they don't need.	Prohibited to freedom camping	Prohibit area to camping as indicated on the map included in the SOP	Prohibit area to camping and extend proposed prohibited area to cover the entire WDC reserve down to the beach	No change. Maintain current regulation under the general rule.	Option 2 - Prohibit area to camping and extend proposed prohibited area to cover the entire WDC reserve down to the beach.  This option is aligned with submitter's request. Extending the prohibited area to cover the entire WDC road reserve parcel will provide more clarity for enforcement and better protection to the fragile dunes. At the same time Option 2 is not materially more restrictive than the original proposal in the SOP as vehicle access to the beach is already controlled by a DOC operated gate and vehicles are prohibited on the dunes.
1	Otangarei No.1 Reserve	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Otangarei Sportspark	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Pataua South	2x - oppose the prohibition	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	District-wide rule	N/A	Option 1 - no change.  This is a busy area with limited parking. Very popular with families and for day excursions, fishing from the bridge. Prohibition on camping has worked well since 2017 and needs to be retained to protect access.
1	Port Road - service lane and carpark area behind 11-67 Port Road	Nil	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
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1	Portland Recreation Reserve	nil	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Ruakaka - Princes Road Reserve	1x support	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area. No opposition through submissions.
1	Ruakaka Recreation Grounds	1x support	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area. No opposition through submissions.
1	Taiharuru	nil	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Takahiwai Sportspark	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Teal Bay/Ngawai Bay - Teal Bay	1x support	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area. Submitter supports continued prohibition.
1	Tikipunga Sportspark	1x support; 1x oppose - taking business from commercial campgrounds that area already impacted by covid- 19 lockdowns.	Prohibited to freedom camping	Designate as a peak- season overflow site for self-contained vehicles only from 18 December to Northland/Auckland Anniversary Day and when Sportspark is not being used for sporting activities.	Retain as a prohibited area under Schedule 1	N/A	Option 1 as per SOP.  Additional 9 general submissions supported overflow camping sites, and 4 submissions opposed it. On balance, allowing peak season overflow camping is a seen as a reasonable approach to help alleviate pressure at coastal areas.

Schedule	Area	Feedback summary	Current bylaw	Option 1	Option 2	Option 3	Recommendation
		,		(as proposed)			
1	Tutukaka Marina Reserve	1x support	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area. Submitter supports continued prohibition.
1	Urquharts bay	1x support	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area. No opposition through submissions.
1	Whananaki – Mangaiti Reserve	nil	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  The prohibition on camping has worked well in this area since the original bylaw was made in 2017. No opposition through submissions.
1	Whangaumu Reserve - west (22 Whangaumu Street)	3x support 2x oppose Locals allegedly causing more problems. At the Hearing a submitter raised concerns about access for freedom campers with disabilities.	Prohibited to freedom camping	Prohibit area to camping	Retain area under the general rule	N/A	Option 1 - prohibit area as per SOP.  Prohibiting area to overnight camping would protect access for all day visitors, including locals, people with disabilities and any campers visiting during the day who then must move on at night. This option provides for the balanced and fair access.
1	Whau Valley Dam	1 - provide more parking for motorhomes	Prohibited to freedom camping	No change - retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  Camping near the Whau Valley Dam is prohibited under the Water Supply Bylaw.
1	William Fraser Memorial Park on Pohe Island	2x oppose the prohibition	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  Area was originally prohibited to camping due to concerns about landfill gas. This issue remains. The area is also expected to become busier with waterfront development and balanced public access to the area needs to be maintained.
1	Woolleys Bay – eastern carpark	2x support	Prohibited to freedom camping	Retain as a prohibited area under Schedule 1	N/A	N/A	Option 1 - no change.  A prohibition on camping has worked well in the past and is supported by submissions.

# Schedule 2 – designated site for self-contained vehicles only

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
2	Onerahi - Beach Road Reserve	3x oppose (1x opposes expansion, 2x oppose restrictions)	Schedule 2 – designated site for self-contained vehicles, 1 night stay maximum.	Expand the designated site as per SOP. Retain the restriction to SC vehicles only in designated site.	No change - maintain current size and status under Schedule 2.	N/A	Option 1 - as per SOP.  Moderate expansion of the designated site as per SOP can alleviate the problem with campers encroaching on boat trailer parking. A clear designated site provides clarity for enforcement. The split configuration of the recommend site expansion is needed to protect the young pohutukawa tree as per advice from the Parks and Recreation department.
2	Riverside/Hatea East Carpark	nil	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	Create a designated site to provide 2-3 spaces for self-contained vehicles only. To protect access, restrict camping to the hours between 6pm-8am. One night stay maximum. Parking rules apply after 8am.	N/A	N/A	Option 1 - as per SOP.  This option has the benefit of providing balanced access to the Town Basin for day visitors who travel in large motorhomes, while dispersing demand by limiting stay to one night only as compared to 3 nights under the general rule.
2	Ruakaka Beach Reserve	3x support the proposed restriction; 1x oppose restriction	Schedule 2 – designated site for self-contained vehicles, 1 night stay maximum.	Prohibit the landward side of the designated site at Ruakaka Beach Reserve due to parking safety concerns. Retain the seaward side of the designated freedom camping site and amend the maps.	Prohibit area to camping.	N/A	Option 1 - reduce site as per SOP.  Least restrictive option to address the perceived problem.  For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
2	Ruakaka Riverside Reserve	6x oppose	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	Establish a designated site to accommodate 3-4 self-contained vehicles.	Prohibit area to camping.	N/A	Option 1 - establish a designated site as per SOP.  Proposal allows for improved management compared to the status quo.  For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".
2	Whangarei Falls Scenic Reserve	1x oppose the designated site, not safe to camp or park	Schedule 2 – designated site for self-contained vehicles, 1 night stay maximum.	no change - designated site, SC vehicles only	Prohibit to camping	N/A	Option 1 - no change.  The current site provides two camping spaces for large motorhomes. The site is centrally located for monitoring and enforcement. This set up allows for appropriate and proportionate controls while still allowing freedom camping to take place.

# Schedule 3 – designated sites for self-contained and non self-contained vehicles

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
3	AH Reed Memorial Park – Whareora Road carpark	nil	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	No change - designated site for SC and NSC vehicles under Schedule 3	N/A	N/A	Option 1 - no change.  Current rules provide appropriate and proportionate regulation (as per FCA criteria).
3	Bascule carpark – Port Road	1x oppose, eyesore at the entrance to city, washing hung to dry	Schedule 3 – designated site for self-contained and non self-contained vehicles, 3 night stay maximum.	no change - designated site, SC and NSC vehicles	N/A	N/A	Option 1 - no change.  Current rules provide appropriate and proportionate regulation (as per FCA criteria).  This site is one of only a few that can accommodate large motorhomes in the city.
3	Kowharewa Bay	3x seek amendment See Attachment 2 for details	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	Seasonal restriction, SC and NSC vehicles	Prohibit area to camping to protect access	No change. Maintain current regulation under Schedule 3.	Option 1 as per SOP.  Seasonal restrictions can address the perceived problem of overcrowding.  For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".
3	Manaia walkway carpark	1x support	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	no change - designated site, SC and NSC vehicles	N/A	N/A	Option 1 - no change.  Current rules provide appropriate and proportionate regulation (as per FCA criteria).  Noting submitter support of the designated site.
3	Marsden Bay Reserve	1x support 1x seek amendment 1x oppose	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	No change - maintain current regulation under Schedule 3.	Prohibit area to camping to protect access	N/A	Option 1 as per SOP.  The northern end of reserve is the area predominantly subject to complaints and submitter feedback. No bylaw changes recommended because planned installation of bollards can resolve the perceived problem.
3	Matapouri – Wehiwehi Road carpark	1x oppose 2x support the proposed restrictions	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	Seasonal restriction, SC and NSC vehicles	No change. Maintain current regulation under Schedule 3.	N/A	Option 1 as per SOP.  A seasonal restriction on camping is deemed the most balanced option to maintain appropriate public access and to protect health and safety while providing clarity to campers and enforcement officers.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
				(as proposeu)			
3	Ngunguru Library	1x support 1x more enforcement needed	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	No change - designated site, SC and NSC vehicles under Schedule 3	Allow tents under Schedule 4	N/A	Option 1 - no change.  Carpark area only. Tents would hinder access. Current rules provide appropriate and proportionate regulation (as per FCA criteria).
3	Ocean Beach carpark	2x support 2x seek amendment 1x indicates opposition	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	Expand the designated site close to the toilets (adding 3-4 vehicle spaces) and prohibit camping on the grassy overflow carpark. SC and NSC vehicles in the designated site.	Reconfigure the designated site as per SOP and extend boundaries of the restricted area to the edge of private property.	Prohibit area to camping	Option 2 - Reconfigure the designated site as per SOP and extend boundaries of the restricted area to the edge of private property.  Option 2 is provided in response to submissions. Parks and Recreation department supports a further expansion of the restricted area for clarity of enforcement.  For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".
3	One Tree Point - boatramp carpark	1x support	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	expand designated site, SC and NSC vehicles	No change - retain current size of the designated site and restrictions under Schedule 3	N/A	Option 1 - expand the designated site as per SOP.  By resolution of Council in 2019 the site was moved to another side of the carpark and there is now room to add 1-2 more marked parking spaces. There has been no opposition through submissions.
3	Reotahi	3x support 1x oppose 1x position unclear - concern about access	Schedule 3 – designated site for self-contained, and non self-contained vehicles, 1 night stay maximum.	Reconfigure the prohibited area to return part of the restricted area of the reserve to regulation under the Reserves Act.  Retain the designated site for SC and NSC vehicles.	No change. Maintain current restrictions under Schedule 3.	N/A	Option 1 - return part of the restricted area of the reserve to regulation under the Reserves Act and amend the map as per SOP.  This option opens up the most flexibility for the Council should it wish to introduce specific rules for tenting for Te Araroa walkers under the Reserves Act. In the meantime, camping still remains prohibited on the reserve under the Reserves Act. For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
3	Tarewa I-Site	Nil	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	Expand the designated site. SC and NSC vehicles under Schedule 3.	N/A	N/A	Option 1 - as per SOP.  Carpark is well utilised by day visitors and café customers. With the designated site now moved closer to the road there is capacity to extend the existing designated site. No opposition received through submissions.
3	Wellingtons Bay – main reserve (Whangaumu Reserve)	2x support 1x oppose 1x seek amendment (prohibit NSC) 1x out of scope (operational - toilets)	Schedule 3 – designated site for self-contained and non self-contained vehicles, 1 night stay maximum.	Extend the prohibited area. Retain the designated site for SC and NSC vehicles.	No change. Maintain current restrictions under Schedule 3	Prohibit area to camping	Option 1 - extend the prohibited area as per SOP.  This is the least restrictive option to address the problem.  For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".

# Schedule 4

Schedule	Area	Feedback summary	Current bylaw	Option 1	Option 2	Option 3	Recommendation
				(as proposed)			
4	Parua Bay	1x out of scope - request to seal the carpark	Schedule 3 – designated site for self-contained and non self-contained vehicles and tents, 3 nights stay maximum.	Restrict all camping to a max of 3 nights, except where Council has determined there should be a 2-night maximum. The permitted stay period will be indicated on a sign displayed in the area. Designate specific sites for tents, non self-contained vehicles and self-contained vehicles. Restrict camping on the "triangle" to self-contained vehicles only to protect access.	No change - retain current size of the designated site and restrictions under Schedule 4	N/A	Option 1 - reconfigure the designated site as per SOP.  The new layout of the designated and restricted area and new controls on the length of stay would provide more appropriate and uniform regulation in this area. No opposition was received through submissions to this proposal.
4	Sandy Bay - toilet block carpark/grass area	4x support the proposal 4x oppose various restrictions 2x unclear position (operational comments)	Schedule 3 – designated site for self-contained and non self-contained vehicles and tents, 1 night stay maximum.	Seasonal restrictions. SC and NSC vehicles, tents, limit vehicle length to 4 m	No change. Maintain current restrictions.	N/A	Option 1 – as per SOP.  Seasonal restrictions can address the perceived problem.  For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".
4	Tamaterau	2 – oppose the designated site.	Schedule 3 – designated site for self-contained and non self-contained vehicles and tents, 1 night stay maximum.	No change - designated site, SC and NSC vehicles, tents. Rely on physical barriers and carpark sealing to address overcrowding	Restrict camping to outside the peak season (which runs from 18 December to 08 February) to maintain appropriate public access to the area and to protect health and safety.	N/A	Option 1 – as per SOP.  Carpark sealing and physical works are expected to resolve the perceived problem. Due to delays with carpark sealing temporary barriers were installed in the area in early January 2021 to prevent vehicles going up into the reserve.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
4	Waipu Caves	1x opposed - wahi tapu area	Schedule 3 – designated site for self-contained and non self-contained vehicles and tents, 1 night stay maximum.	no change - designated site, SC and NSC vehicles, tents.	Prohibít site	N/A	Option 1 - no change.  Restrictions on camping under Schedule 4 provide for protection of the area and sanitation while permitting camping in the designated site. Bollards had been installed to assist. The designated site has been in high demand in the past and has performed well with regular enforcement and monitoring.
4	Whananaki North	13x oppose amendment and seek prohibition 6x seeking seasonal restrictions 1x position unclear, but refers to environmental damage	Schedule 3 – designated site for self-contained and non self-contained vehicles and tents, 1 night stay maximum.	Update map. Designated site for SC and NSC vehicles, tents.	Close the designated site at Whananaki North and remove the area from Schedule 4. The area to be regulated under the general rule.	Option 3 - Seasonal Restrictions  Option 4 - Prohibit camping to protect the area.	Option 2 – regulate the area under the general rule  Under the general rule (clause 6 of thy Bylaw) self-contained vehicles only can stay for up to 3 nights.  For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".
4	Woolleys Bay – western carpark	2x support 1x oppose	Schedule 3 – designated site for self-contained and non self-contained vehicles and tents, 1 night stay maximum.	Seasonal restriction, SC and NSC vehicles, tents.	Prohibit area to camping	N/A	Option 1 as per SOP.  A seasonal restriction can address the overcrowding problem to protect access. Recent years have seen persistent overcrowding by high numbers of freedom campers and a local population increase.

# **General areas**

(regulated under clause 6 of the Camping in Public Places Bylaw)

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
0	Billar Rd Ruakaka	1x seek amendment to prohibit freedom camping	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  Area is already regulated under the general rule. Campers are required to be parked legally, stay limited to 3 nights and in a self-contained vehicle. No formal freedom camping complaints for this area have been recorder since 2017. Further restrictions not warranted based on available data.
0	Esplanade Reserve between 108 and 110 One Tree Point Road	1x seek amendment to prohibit freedom camping	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  Area is already regulated under the general rule. Campers required to be parked legally, and non self-contained camping is prohibited. Further restrictions not warranted based on available data.
0	Fertilizer Road, Port Whangarei	1x seeking to provide more large motorhome parking	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  Area is already regulated under the general rule. Campers required to be parked legally, and non self-contained camping is prohibited. Council is not required by legislation to provide any type of freedom camping facilities (such as parking for large vehicles).
0	Forum North Carpark	1x seeking to allow overnight freedom camping	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change.  Maintain current regulation under the general rule.	Restrict camping to the hours between 6pm to 8am.	N/A	Option 1 - no change.  Any vehicles parking during the day, including freedom camping vehicles must comply with parking rules. Outside of parking regulated hours camping in the area is already regulated under the general rule clause 6. Campers are required to be parked legally, and non self-contained camping is prohibited. Council is not required by legislation to provide designated sites or facilities for freedom camping.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
0	Langs Beach, corner of Wairahi and Cove RD?	1 - seek amendment to prohibit freedom camping	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	Prohibit area	N/A	Option 1 - no change.  Regulation under the general rule provides sufficient control. Enforcement feedback is this area is popular with day visitors and families using the playground but has not been under pressure from freedom camping.
0	Matapouri Estuary	1 - seek amendment to prohibit freedom camping	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	Prohibit area	N/A	Option 1 - no change.  Matapōuri Estuary has experienced ecological damage from vehicles disturbing fragile dunes. The SOP noted planned installation of bollards is expected to resolve the problem of all types of vehicles disturbing the dunes (not just vehicles used in freedom camping). Bollard installation has begun in January 2021 after consultation with hapu. Further restrictions not warranted based on available data.
0	Ngahau Bay	1x - seeks amendment to prohibit freedom camping. Tabled a letter with signatures for a ban at Ngahau Bay. Requests a sign "camping prohibited" at carpark entry and at top of the hill. Small carpark, no rubbish bins, no toilets	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	Prohibit to camping	N/A	Option 1 - no change.  Area is already regulated under the general rule.  Campers required to be parked legally, stay limited to 3 nights and in a self-contained vehicle. One formal freedom camping complaint for this area has been recorded since 2017.  Further restrictions not warranted based on available data.
0	Nova Scotia Drive, Waipu	2x seek amendment - prohibit to freedom camping	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change.  Maintain current regulation under the general rule.	Prohibit to camping.	N/A	Recommended to refer to Health and Bylaws for enforcement on complaints basis.  These are two esplanade reserves near 100 Nova Scotia Drive crossing over with Waipu River. No other bylaw complaints were received for this area during 2017-2020. Most of the area is private land except for the small Esplanade reserve. No evidence of a problem that justifies prohibition on camping on the esplanade reserve.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
0	Pacific Bay	6x seeking to prohibit camping	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	Prohibit area to camping	N/A	Option 1 - no change.  Area already regulated under the general rule.  For detailed feedback see Attachment 2. For analysis see the deliberations agenda report section 5.3 "Area-specific matters".
0	Pataua North	1x seek to restrict freedom camping	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	Designated site	N/A	Option 1 - no change.  Enforcement feedback is this area in general has not been problematic in the past. Designating a camping site risks creating unintended consequences by advertising the site and attracting higher volumes of campers than the area can sustain. Regulation under the general rule provides sufficient controls.
0	Peter Snell Road, Ruakaka	1x seek amendment to prohibit freedom camping	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  One freedom camping complaint for this area has been received since 2017 - this does not warrant a prohibition on camping based on available data. Regulation under the general rule provides sufficient control.
0	Ralph Trimmer Drive, Marsden Point	1x seek amendment to prohibit freedom camping	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  Area is popular with locals for fishing. Enforcement feedback is this area in general has not been problematic in the past. Only three freedom camping complaints received since 2017 - this does not warrant a prohibition on camping. Regulation under the general rule provides sufficient controls.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
0	Reserve at 25 Marsh Street, Ruakaka	1x seek amendment to prohibit freedom camping	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change.  Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  Area is already regulated under the general rule. Campers required to be parked legally, and non self-contained camping is prohibited. Further restrictions not warranted based on available data.
0	Sime Road, Ruakaka	1x seek amendment to prohibit freedom camping	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  One freedom camping complaint for this area has been received since 2017 - this does not warrant a prohibition on camping. Regulation under the general rule provides sufficient control.
0	Taurikura	1x seek amendment to prohibit freedom camping – limited verge to park for day visitors	General rule – clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  Area is already regulated under the general rule.  Campers required to be parked legally, and non self-contained camping is prohibited. Further restrictions not warranted based on available data.

Schedule	Area	Feedback summary	Current bylaw	Option 1 (as proposed)	Option 2	Option 3	Recommendation
0	Waihoihoi Park, Waipu	3 - seeks to prohibit camping - limited access, sensitive ecology	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	N/A	N/A	Option 1 - no change.  Waihoihoi Park is not under pressure from freedom camping, therefore additional restrictions are not warranted. Since 2017 there have been only two complaints about freedom camping in this area. One of the complaints was about the camping apps listing Waihoihoi Park as an "authorised" site for camping. Staff have now ascertained neither the CamperMate App nor Rankers list Waihoihoi Park as a camping site. Enforcement contractors haven't raised any issues in regard to this area. The park is well utilised by locals and day visitors. There is no supporting data to attribute environmental damage to freedom campers.
0	Whananaki South	1 - seek prohibition 1 - out of scope - facilities provision to accommodate campers and day visitors - concerns about rubbish, fires, need to provide toilets.	General rule — clause 6. Camping in self-contained vehicles for up to 3 nights, must be legally parked.	No change. Maintain current regulation under the general rule.	Designated site	Prohibit to camping.	Option 1 - no change.  Since 2017 five formal complaints were received for freedom camping in Whananaki South, which does not compound to warrant a prohibition on camping at this stage. Enforcement feedback is area generally not problematic, however it's remoteness would make a designated site difficult to enforce. Provision of facilities is out of scope of bylaw review.



