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7 August 2025

The Chief Executive  
Queenstown Lakes District Council  
Private Bag 50072  
Queenstown 9348

**By email:** [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

To Whom it May Concern:

**Submission on the QLDC Freedom Camping Bylaw 2025**

1. We represent Orange Lakes (NZ) Ltd (**OLL**) who is the Pastoral lessee of Hunter Valley Station, which includes land on both sides of Meads Road, Lake Hāwea (Figure 1). Parts of Meads Road runs through the farmstead of Hunter Valley Station and its associated residential accommodation and farm buildings.
2. Meads Road is located approximately 30 minutes / 30 km from the Hāwea township and approximately 50 minutes from Wānaka (Figure 2), where the nearest police or Council staff are based.
3. OLL does not oppose the making of a bylaw under section 11 of the Freedom Camping Act 2011 and submits that freedom camping should, for the reasons noted hereafter, be prohibited on or adjacent to Meads Road.



Figure 1. Meads Road (yellow – area identified as restricted).



Figure 2. Location of Meads Road relative to Lake Hāwea and Lake Wānaka.

4. We are aware of other landholders, including Hunter Valley Farming and Lake Hāwea Station, who have submitted on the bylaw expressing similar concerns. We support these submissions.
5. Meads Road is a single lane, gravelled rural road. We understand that rural roads have been identified as a 'restricted' freedom camping area in the bylaw, which allows for freedom camping:<sup>1</sup>
  - (a) using a self-contained vehicle,
  - (b) parked a minimum of 5 metres from the edge of the road hard shoulder or seal, yet remaining on a formed gravel / sealed surface, and
  - (c) for a maximum of two nights within any 30 period.
6. Freedom campers must also contain their camping equipment and personal items within 2 metres of their vehicle, not leave any waste, and not light any fires outside the vehicle.<sup>2</sup>
7. The obvious question this submission raises is: Who will monitor and enforce / police such conditions, especially given the isolated location of Meads Road?

<sup>1</sup> Draft Freedom Camping Bylaw 2025, clause 8.

<sup>2</sup> Ibid.



### *Application of the Freedom Camping Act 2011 to Meads Road*

8. Under the Freedom Camping Act 2011, restrictions / prohibitions may be placed on freedom camping where it is necessary for one or more of the following purposes:<sup>3</sup>
  - (a) Protect the area;
  - (b) Protect the health and safety of people who may visit the area; and
  - (c) Protect access to the area.
9. We note that no site-specific assessment has been undertaken for Meads Road to assess its suitability for freedom camping and whether further restrictions / prohibitions are required under section 11 of the Freedom Camping Act 2011.<sup>4</sup>
10. Meads Road is used by OLL as part of their day-to-day farming operations and runs through its farmland.
11. Freedom campers set up along Meads Road would affect OLL's access to their land and their ability to undertake farming operations. Meads Road is used regularly to move stock between paddocks, which would present a health and safety risk to any freedom campers along the road. There is evidence of incidents occurring where visitors do not understand farming operations, resulting in the death of livestock.<sup>5</sup> This is particularly the case during lambing / calving.
12. Sections of Meads Road are unfenced. This presents a further health and safety risk to freedom campers travelling / camping along the road.
13. Meads Road is also in an isolated location (see Figure 2 above), approximately 30 minutes from Hāwea and 50 minutes from Wānaka. If an incident / fire were to occur in this location, this could spread quickly through farmland adjacent to Meads Road, especially during summer / dry conditions. An example of such concern is the recent fire near Twizel that burned through 3,000 hectares after campers accidentally knocked over a stove.<sup>6</sup> It is understood proximity to fire services was not an issue considered in the development of the bylaw.

### *Comments on the practicality of the draft bylaw applied to Meads Road*

14. It may not be possible to freedom camp along Meads Road in accordance with the restrictions listed in the bylaw.<sup>7</sup> Given the nature and formation of Meads Road, there are few areas where a camp could be set up within the conditions of the bylaw, i.e. 5 metres from the road shoulder and remaining on a formed gravel / sealed surface. These areas are likely to coincide with laybys / wide road shoulders containing farm gates. Camping in these locations would further impact OLL's access to its land.

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<sup>3</sup> Section 11.

<sup>4</sup> QLDC Council Report, Adopt draft Freedom Camping Bylaw 2025 (26 June 2025), at [37].

<sup>5</sup> See: <https://www.nzherald.co.nz/the-country/news/bikers-others-urged-to-ask-permission-first-after-cows-deaths/NBSXRNAOPOOOPSC6V4HCS3IVAQ/>.

<sup>6</sup> See: <https://www.fireandemergency.nz/incidents-and-news/news-and-media/learning-the-lessons-of-wildfires-past-twizel/>.

<sup>7</sup> At clause 8.

Compliance with the bylaw along Meads Road would inevitably encourage campers to trespass on private land to camp.

15. The road is gravelled, is narrow and steep in places, and is often in poor condition following adverse weather events which are frequently experienced in this location. The road is not suitable for large or 2WD campervans, or inexperienced drivers. There have been many instances where OLL and its staff have been required to rescue campers stuck in fords, ditches, or paddocks.
16. Although freedom campers are expected to camp in a way that complies with the bylaw and other existing bylaws / laws relating to their behaviour, freedom camping has been associated with an increase in anti-social behaviours and an increase in littering of waste. These behaviours have been acknowledged in the technical assessment that informed the development of the bylaw<sup>8</sup> and have been directly experienced by OLL. Noting the outcome of the *New Zealand Motor Caravan Association Inc v Queenstown Lakes District Council* [2024] NZHC 2729, OLL still holds concerns in respect of adverse effects on amenity values, rural character, and outstanding natural landscape values.
17. Compliance with the bylaw will be difficult, if not impossible, to monitor or enforce given the large area of restricted freedom camping locations and, therefore, is likely to be ineffective. This is particularly the case for Meads Road, which is isolated from Wānaka and Hāwea and is unlikely to form part of any regular monitoring by QLDC (even if such ever occurs). The landowners will have no ability to enforce freedom camping in accordance with the bylaw and will be burdened with assisting stranded campers and any clean up required when freedom campers depart.
18. There are other rural roads in the vicinity of the Hāwea township which are more suitable for freedom camping. These roads are less isolated and, therefore, are safer for freedom campers and will be monitored more frequently by QLDC.
19. Most importantly in terms of Meads Road, there is an existing Department of Conservation campsite at Kidds Bush which provides appropriate facilities to support people wishing to camp in the area. Access to the same is available at an extremely moderate cost of \$15 for an adult and \$7.50 for a child per night. This campsite is open year-round.<sup>9</sup>
20. In summary, freedom camping should be prohibited along Meads Road to:
  - (a) Protect the area – Freedom camping is associated with anti-social behaviours that adversely impact areas where camping is permitted. This includes littering and the disposal of noxious waste.
  - (b) Protect health and safety of people who may visit the area – Meads Road is a working rural road used regularly by OLL who owns the adjacent land to move

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<sup>8</sup> Attachment D: Tonkin+Taylor, Freedom Camping Bylaw Development – Expert Services: Technical Assessment Report, June 2025 at 4.5.2.

<sup>9</sup> See: <https://www.doc.govt.nz/parks-and-recreation/places-to-go/otago/places/hawea-conservation-park/things-to-do/kidds-bush-reserve-campsite/>.

stock, presenting a health and safety risk to both landowners and freedom campers. The road is single lane, with blind corners, and portions of the road are unfenced meaning stock can be within the road reserve at times. The road is also unsuitable for large or 2WD campervans and unsafe for inexperienced drivers.

- (c) Protect access to the area – Meads Road is utilised by private landholders to access their land and undertake farming operations and also by campers travelling to the DOC campsite at Kidds Bush. Freedom camping along Meads Road would affect landholders' ability to access their land and access to the DOC campsite.

*Relief sought*

- 21. OLL seeks the following amendments to the proposed bylaw:
  - (a) Undertake a site-specific assessment for Meads Road; and
  - (b) That Meads Road is identified as a prohibited area.
  - (c) In the alternative, OLL seeks any consequential alteration, or other necessary relief to address the concerns and issues raised in this submission with respect to freedom camping on Meads Road.
- 22. We wish to be heard in support of our submission.

Yours faithfully

**TODD & WALKER LAW**



**Rosie Hill**

Principal

Email: [REDACTED]

Matter ID: [REDACTED]



**Graeme Todd**

Consultant

Email: [REDACTED]



## **Arrowtown Promotion and Business Association Freedom Camping Bylaw Submission – July 2025**

The Arrowtown Promotion and Business Association (APBA) is a non-profit community organisation of commercial ratepayers and business operators covering the Arrowtown business district. The Board has representatives from these groups and the Arrowtown Kawarau Ward QLDC representatives. We represent over 190 businesses.

The APBA activities cover the commercial area of Arrowtown and the Arrowtown-Kawarau ward catchment area. The Association employs a Manager to support all the activity they undertake annually.

The APBA engages with Destination Queenstown (DQ), the Arrowtown Village Association (AVA), Queenstown Lakes District Council (QLDC), Otago Regional Council (ORC), Village Residents, Event Planners and the Lakes District Museum to promote, preserve, advocate and protect the interests of Arrowtown.

Our submission relates specifically to the Flint Street carpark, which the APBA are in support of and believe the restrictions are appropriate. APBA are also in support of all the suggested prohibited areas within Arrowtown boundary in this Freedom Camping bylaw. We thank QLDC for ensuring no restricted areas are near waterways and where possible, sit near to public toilets.

In relation to the Flint Street carpark, we would like to draw attention to some considerations for the panels review:

- The nearby toilet on Ramshaw Lane remains open 24/7 for access for the campers
- We support the timing restriction of 6pm to 8am for this location and would seek this remains in place, as allows for those visitors to dine in our restaurants or have breakfast, grab a coffee before departing in the morning, supporting our hospitality sector without impacting on the commuter or daytime visitor trade and promote and support visitor expenditure
- We seek that due to both google maps and the physical sign that sits outside the carpark both refer to this carpark as called “Hansens Road Carpark” that it is renamed from Flint street to “Hansens Road Carpark”, in the final bylaw, to avoid confusion for the campers

One point we urge the panel to take into consideration for the bylaw to be effective is Enforcement, with the following important points and considerations:

- Enforcement underpins the whole bylaw as without it, it makes a mockery of the bylaw and in particular the time, resources and expense from ratepayers that have gone into this amended bylaw



- Enforcement is especially important from the very start that the bylaw comes into effect, as word of mouth travels fast and campers will become aware very quickly, through their communication channels, which locations are not enforced over others
- We seek either a CCTV camera that can monitor only the parks designated for self-contained motor vehicles remotely for fines. Though we have concerns on how effective this will be in the long term, especially if visitors are using private self-contained vehicles and thus could leave the country without paying
- Consideration in short-term for local enforcement by either official or local neighbourhood group that could be trained and given responsibility to issue fines. We have a volunteer group that run the local volunteer police station, could this group or similar be utilized to also do a morning or evening check at the start/end of their shift to issue fine and check wellbeing of the self-contained motor vehicles and the inhabitants?
- We would like it noted that any 'training' on the presentation of this enforcement needs to reflect the welcoming style of our district and not taint the perception of the Queenstown Lakes in delivering the message during the ticketing process and have the means to provide a warning over a fine, when necessary.
- The enforcement also allows and ensures for the following conditions in the restrictions are adhered too:
  1. use a certified self-contained motor vehicle;
  2. Use one of the 5 marked self-contained motor vehicles spaces
  5. ensure any motor vehicle, camping equipment and any other personal items are fully contained within the one of the marked spaces;
  7. not leave any waste;
  8. not light any fires outside of the motor vehicle.

These are all incredibly important for many reasons and we urge that this is another important reason why enforcement underpins this whole bylaw
- APBA are concerned that the fine, currently sitting at \$400 is not high enough, especially for certain countries with a higher exchange rate and when comparing to the cost of accommodation in Arrowtown. APBA desire is that in order for the fine to be a proper deterrent, we seek the council to speak to government to get this increased, ideally double or \$1,000NZD; even if not possible for this summer but for future years to continue to protect this valuable asset that we all call home

Thank you for your time reading our submission and we would like it noted that we would like to speak at the hearing in support of our application.

APBA Board Members: Benje Patterson (Chairperson), Scott Julian (Deputy Chair) Heath Copland (Treasurer), Nicky Busst (Manager), Sam Laycock, Vicky Arnold, Nick Fifield, Tom Morrison, Dave Harding Shaw, Jane Peasey, Liisa Koskinen and Rebecca Readings.

Arrowtown Promotion & Business Association  
c/o 49 Buckingham Street, Arrowtown 9302  
www.arrowtown.com

## Submission on the Proposed Draft Freedom Camping Bylaw 2025

Cardrona Valley Farms Ltd (CVFL) strongly opposes the proposed Draft Freedom Camping Bylaw 2025, particularly the provision allowing restricted freedom camping on rural roads in the Upper Clutha Basin and surrounding areas. Our primary concern is the impact on **Tuohy's Gully Road**, which provides access to our 5,200-hectare high-country sheep, cattle, and deer station.

This proposal presents a serious threat to public and farm safety and carries an unacceptable risk of unauthorized access, trespass, and environmental degradation.

### Key Concerns

#### Unacceptable Risks to Farm and other Business Operations and Public Safety

Allowing freedom camping on rural roads like Tuohy's Gully Road directly jeopardizes our farming operations and the safety to both our staff and the public under the Health and Safety in the Workplace Act (2016)

Operational Interference: We routinely move livestock (sheep, cattle) along this quiet rural road and operate heavy farm machinery at various times, day and night. We work alongside other road users in our area to mitigate risk and our liability is high due to the many and varied 'overlapping duties' in this particular area. Introducing freedom campers would significantly increase the risk of vehicle and stock-related incidents, disrupt daily farming activities, and pose ongoing and varied security risks.

Tuohy's Gully Road serves as an active thoroughfare for several third-party businesses operational on our property. These businesses have significant health and safety obligations:

- **Cardrona Horse Trekking and Motorbike Tours:** Operates daily throughout the year, with horses and motorbikes using this road section.
- **Southern Hemisphere Proving Ground (SHPG):** Accesses CVFL's private road (access road to SnowFarm) via Tuohy's Gully Road at various times, day and night throughout the year. CVFL has authorized SHPG to manage this access road.

Privacy and Trespass: The mapped area intersects with our privately owned and operated farm. Permitting vehicles to pull off the road and park poses a significant risk of unauthorized access and trespass, which would have substantial privacy implications for our family, employees, and neighbors who reside near the road.

Fire Risk: Rural roadsides in Central Otago and the Upper Clutha are high-risk fire zones, especially during dry periods. Campers using stoves, smoking, or having BBQs pose a severe fire hazard, as demonstrated by past events like the Twizel fires.

Visual Impact: The presence of parked campervans and associated activity would decrease the visual quality for the ten neighbouring dwellings located within 1km of this rural road.

#### Inadequate Justification and Site Assessment

The Council Report's rationale for including rural roads is contradictory and lacks critical assessment:

Contradictory Data: Item 39 of the Council Report notes that the majority of infringements and complaints do not relate to rural roads, undermining the justification for their inclusion.

No Site-Specific Assessments: Item 37 confirms that no site-specific assessments have been carried out on rural roads. This is a critical oversight, as areas along Tuohy's Gully Road are typically narrow, gravel, and tree-lined, with minimal layby areas. We struggle to identify any sections that would realistically comply with the proposed bylaw's conditions, given the presence of private driveway entrances and paddock accessways.

#### Unfair Burden and Widespread Non-Compliance

The bylaw places an unfair and dangerous burden on rural landowners, who are left to manage the consequences of non-compliance without adequate support.

**Enforcement Challenges:** Due to the remoteness of rural roads, enforcement will inevitably fall on landowners, forcing us into difficult and potentially dangerous confrontations with campers.

**Observed Non-Compliance:** Despite the requirement for certified self-contained vehicles, non-compliance is widespread. We have ongoing issues when:

- people venture and park in areas further than the designated areas (this already is a problem we manage)
- people defecate in our paddocks and along fencelines.
- campers setting up directly next to our mailbox, stock routes and access gates.
- campers litter, broken bottles, and human waste being left behind.

**Landowner Subsidisation:** Expanding freedom camping on rural roads will only magnify these existing problems. We, as landowners, are forced to clean up this waste and manage these risks

### **Environmental Degradation and Impact on Other Users**

The proposed bylaw poses significant environmental risks and diminishes the experience for other recreational users.

**Environmental Management:** CVFL operates an environmental plan that includes a strong focus on biodiversity and pest control. Our team actively monitors and works to protect specific species, including the Kārearea (NZ Falcon) and Otago Flathead Galaxias. These protected species live and reproduce in the waterways and trees close to Tuohy's Gully Road and would be negatively influenced by the increased overnight traffic in the area. Parker Conservation is an organisation funded by the community to learn and protect the native species in our area with a particular focus on the Karearea.

As part of our commitment to environmental stewardship, Cardrona Valley Farm works with other large landowners in the valley on a collaborative and systematic pest control program. We target a range of pests, including rabbits, pigs, possums, ferrets, rats, and stoats. Our methods involve both poisoning and a seasonal night shooter who operates on the road to manage these populations. Southern Sanctuaries has been instrumental in developing a community trapping program operational in the area.

**Sanitation Issues:** The high likelihood of campers defecating and urinating on private land, rather than using onboard facilities, leads to waterway pollution, general unpleasantness, and degradation of the natural environment.

**Waste Management:** Beyond human waste, issues with general rubbish and effluent management are prevalent.

**Diminished Recreational Experience:** Tuohy's Gully Road is used by walkers and bikers accessing the Meg Pack Track, (an easement we provide to DOC to allow access to the Meg Hut and Pisa Range Area. The presence of parked campervans, litter, or greywater runoff along the trail diminishes their experience, reduces their solitude, and could lead to user conflict.

### **Confusion and Liability**

The bylaw creates confusion for visitors and significant liability concerns for landowners.

**Misleading "Restricted Camping" Label:**

Due to the nature of the surrounding area, which includes the Snowfarm/SHPG/DOC access road and the Meg Pack Track DOC carpark, using a 'restricted camping' label could dangerously mislead visitors about permitted activities. This confusion could result in unauthorized access or other safety issues.

Unclear Responsibility: Who is responsible for managing and policing compliance on remote rural roads? Who is responsible for recovering vehicles that get stuck or damaged during civil emergencies (e.g., floods, fires)? Who pays for damage if a freedom camper's vehicle is impacted by farm machinery (e.g., graders, stock trucks) operating on the road?

Visitor Misinterpretation: The bylaw and maps are difficult for visitors, especially those unfamiliar with New Zealand's land tenure, to interpret. Tourists may not understand where public roads end and private land begins, or the true meaning of "restricted," increasing the risk of unintentional trespass and road blockages.

### **Alternative Proposal: Designated Freedom Camping Areas with Facilities**

We strongly advocate for a model where freedom camping is only permitted in designated locations with appropriate facilities, such as the Luggate Red Bridge site. These areas utilize public land with low impact on communities, offering toilets, monitoring, and basic amenities.

There is ample public land in the region suitable for legal camping, which are far more appropriate than fragile rural road corridors with multi-use pressures. The draft bylaw's reliance on "restricted" rules (certified vehicles, marked areas, time limits) does not explain how this will be enforced in remote rural settings.

### **Recommendations**

Cardrona Valley Farms Ltd urges QLDC to adopt a more balanced, evidence-based approach and recommends the following:

- Redefine Tuohy's Gully Road from the proposed RESTRICTED area to a PROHIBITED area
- Define the SnowFarm/SHPG/DOC access road to the Pisa to a PROHIBITED area
- Remove all rural road corridors from the proposed restricted areas unless fully consented by the adjacent landowner
- Prioritise investment in designated freedom camping areas with proper facilities and monitoring.
- Strengthen enforcement mechanisms and increase ranger presence during peak seasons.
- Engage with rural communities to co-design solutions that balance visitor access with local wellbeing.

### **Conclusion**

While well-intentioned, the proposed bylaw requires significant revision to ensure it effectively protects the environment, manages health and safety risk and respects the businesses and local communities present. Allowing freedom campers to park adjacent to farms and local businesses often comes at no cost to them, but at a high cost to the private land/business owner in terms of safety, privacy, risk, and environmental protection.

Sincerely,  
Sarah and Willy Scurr  
On behalf of Cardrona Valley Farms Ltd



6 August, 2025

Cardrona Valley Residents and Ratepayers Society

[REDACTED], Wanaka 9382, NEW ZEALAND

**TO:** Queenstown Lakes District Council

**REGARDING:** DRAFT FREEDOM CAMPING BYLAW

Dear QLDC team,

Thank you for the opportunity to make a submission regarding QLDC's draft Freedom Camping bylaw. Firstly, I would like to commend QLDC for your efforts to control freedom camping. It is a shame your previous effort was thwarted by the NZMHA.

This submission is made on behalf of the Cardrona Valley Residents and Ratepayers Association. For this reason, my below comments are restricted to a particular area of concern within Cardrona.

In the draft bylaw, QLDC has proposed that Tuohy's Gully Road is included as a Restricted Freedom Camping Area. Tuohy's Gully Road runs between Cardrona Valley Road and DOC's Meg Track car park. We strongly opposed the inclusion of Tuohy's Gully Road as a Restricted Freedom Camping Area, for the following reasons:

1. Within limits of Cardrona township

The boundaries of the Cardrona township are defined by recently erected QLDC signs, as shown on Figure 1. The entrance to Tuohy's Gully Road is within the Cardrona township, between the QLDC signs. QLDC has not proposed that roads within other townships in the district should be included as Restricted Freedom Camping Areas. Why should Cardrona be treated differently?

Furthermore, the proposed Tuohy's Gully Road Restricted Freedom Camping Area runs past four residential properties, two of which are home to young primary school children.

2. Freedom camping is prohibited within Meg Track Car park

Tuohy's Gully Road provides access to DOC's Meg Track car park (see Figure 2), and this car park is shown as a Restricted Freedom Camping Area in the draft Freedom Camping bylaw. The Meg Track car park is private land owned by Cardrona Valley Farms Ltd (CVFL), and is not owned by DOC. I have consulted with CVFL, and it has been confirmed that the car park is subject to an easement agreement between DOC and CVFL which specifically prohibits camping.

Also, the Meg Track car park is immediately adjacent to the heritage site of the historic Lower Cardrona township. There are many unsecured historical artifacts on this site, and these will be at risk of theft if camping occurs within the immediately adjacent car park.

Furthermore, allowing freedom camping in this location will have a negative environmental impact. A small stream runs through the Meg Track car park. Despite encouragement to do otherwise, freedom campers will wash in the stream, and urinate/defecate immediately adjacent to the stream. There are no toilets in the car park, there are few bushes to hide behind and there is a steep open slope on the other side of the stream. There is simply nowhere else on the site for them to go, except on adjacent private land or immediately beside the stream.

3. Freedom campers unable to distinguish between Restricted Freedom Camping Area on Tuohy's Gully Road and prohibited areas in formed roads/tracks adjoining Tuohy's Gully Road

Despite QLDC's efforts to provide information, we all know that Freedom campers do not read bylaws. They will be unable to distinguish between Restricted Freedom Camping Area on Tuohy's Gully Road and prohibited areas on formed roads/tracks that intersect with Tuohy's Gully Road (see Figure 3). This includes the following:

- The Snow Farm / SHPG access road, which is owned by CVFL and heads north off Tuohy's Gully Road. There is an area that looks like a car park approximately 150 metres up Snow Farm / SHPG access road, on the eastern side of the road (see Figure 4). This is on privately owned CVFL land but will be an attractive stopping spot for freedom campers. There are also several other spots further up the Snow Farm / SHPG access road that would be attractive to freedom campers.
- The unnamed paper road that runs south from Tuohy's Gully Road, and provides access to 4 residential properties: This paper road extends for approximately 350 metres before merging into a CVFL farm track that has numerous sites attractive to freedom campers. There is no way to distinguish between the paper road and the farm track.

#### 4. Health and Safety risks posed by farming operations

The Health and Safety in the Workplace Act (2015) (HSWA) defines a farm as a workplace. The HSWA also defines the farmer as a Person Conducting a Business Undertaking (PCBU). Wherever there's work happening, PCBUs have legal obligations under the HSWA and must ensure that, as far as reasonably practicable, no-one is at risk from the work activities. The HSWA covers all persons present on the worksite, and does not distinguish between whether members of the public have a legal right to access the land or not. Tuohy's Gully Road, the Snow Farm / SHPG access road, and the paper road running south from Tuohy's Gully Road are all key pathways within CVFL's property, and are used multiple times per day by farm machinery and moving stock.

In addition to the areas described in point 3 above, a small triangle of land shown in Figure 4 is of concern. Freedom campers would be able to park on this site if Tuohy's Gully Road is included as a Restricted Freedom Camping Area. It's doubtful that a flock of sheep being herded past this site would cause physical risk to freedom campers, but the same cannot be said of a mob of 1000 kg cattle.

Allowing freedom camping on Tuohy's Gully Road will make it more difficult for CVFL to comply with its legal obligations under the HSWA. Please see the attached WorkSafe Policy Clarification for further information regarding recreational activities and the HSWA.

Please note that I wish to appear before QLDC's hearing panel to support this submission.

Best regards



**Tim Allan**

*Secretary, Cardrona Valley Residents and Ratepayers Society*

████████████████████, Wanaka 9382, NEW ZEALAND

Mobile: ██████████



Figure 1



Figure 2



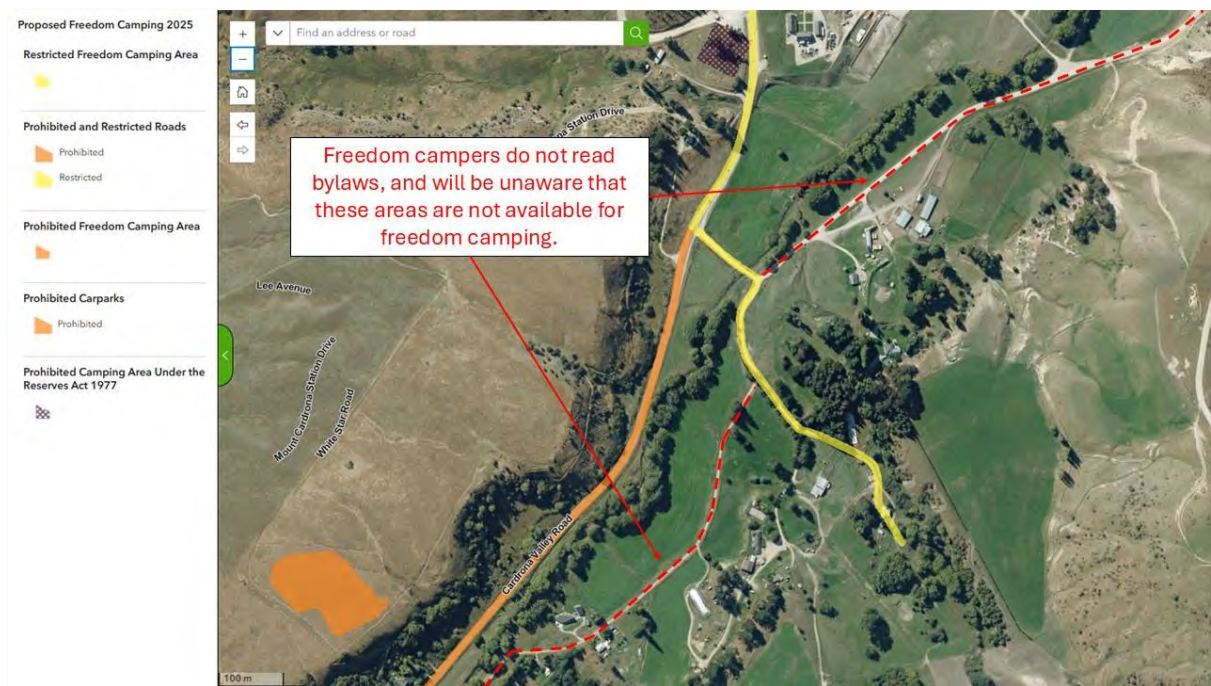


Figure 3



Figure 4



May 2019

## POLICY CLARIFICATION

# Recreational access and the Health and Safety at Work Act (2015)

### Purpose

There's often uncertainty about how the Health and Safety at Work Act (2015) (HSWA) applies when people access land for recreation. This document clarifies our view, particularly:

- the responsibilities of the Person Conducting the Business or Undertaking (PCBU) and visitors, and
- how we'll manage and respond to concerns.

You should read this policy clarification if:

- your land is accessed, or could be accessed, for recreation, or
- you want to access public or private land for recreational activities.

You should read this clarification in conjunction with the [frequently asked questions about recreational access](#)

### What's recreational access and what does HSWA have to do with it?

Recreational access is when people use the land's features (eg forests, cliffs or waterways) for different outdoor activities (eg walking, cycling, kayaking, hunting, fishing, rock climbing and swimming).

Sometimes people need to use or cross land that's a workplace, or is affected by a PCBU's work, to do these activities. This land can be:

- public/Crown-owned (eg Department of Conservation land, Council land, Crown-owned forestry land or school land), or
- private (eg working farms).

### What does HSWA say?

Wherever there's work happening, PCBUs have duties under HSWA. They need to make sure that, so far as is reasonably practicable, no-one is at risk from the work.

HSWA doesn't cover:

- whether or not the public have the right to access land, or
- injuries that happen as a result of doing a recreational activity.

### What does this mean for recreational access?

HSWA only applies to recreational access when the land is affected by a PCBU's work activities or is part of a workplace.

This means a PCBU whose land is being accessed for recreation is:

- **only** responsible for risks arising from the work or workplace, and is
- **not** responsible for the risks associated with the recreational activities.

PCBUs can usually meet their duties to recreational visitors in simple ways (eg using signs, emails, or verbal warnings to let people know about work hazards).

These duties apply whether the recreational activities are commercial or not.

The only exception is when the PCBU's business or undertaking also provides the recreational activity. In this case, they're also responsible for managing risks associated with that activity, so far as is reasonably practicable.

Visitors have responsibilities too, regardless of whether there's a legal right of access. Anyone accessing land for recreation needs to follow:

- any reasonable health and safety instructions the PCBU gives them regarding the work or workplace, and
- other reasonable requests (eg shutting farm gates and not frightening stock during lambing).

HSWA doesn't cover injuries sustained by someone who's accessed land for recreation and hurts themselves as a result of the recreational activity.

## **When will WorkSafe intervene?**

If we're notified of an incident, we'll follow the process outlined in [When Will WorkSafe Intervene](#)

We won't get involved in disputes over land access as this isn't our role.

Where appropriate, we'll refer enquiries to the [Walking Access Commission](#) which can:

- provide information and advice
- offer a free disputes resolution service, and
- create recreational access easements.

## **Further information**

For further information see:

- [Frequently asked questions about recreational access](#)
- [Reasonably practicable](#)

Friday 8 August 2025

**Re: QLDC Draft Freedom Camping Bylaw 2025**

Thank you for the opportunity for Destination Queenstown (DQ) and Lake Wānaka Tourism (LWT) to provide feedback on the draft Freedom Camping Bylaw 2025.

Campers are an important part of Queenstown Lakes District's visitor mix. As part of our destination marketing approach we focus on ensuring the region appeals to a range of travel styles and budgets, encouraging longer stays and dispersing tourism across the region to create a thriving visitor economy.

At the same time, we're committed to ensuring the region remains a safe, well-managed destination. We support the need for a Freedom Camping Bylaw and have outlined feedback on the proposed bylaw below.

**1.0 Freedom camping on rural roads**

- 1.1 We strongly recommend freedom camping on rural roads is prohibited, rather than restricted.
- 1.2 We have concerns about the safety of both campers and other drivers if freedom camping is allowed on rural roads.
- 1.3 While QLDC is proposing restrictions on freedom campers on rural roads, there is a reasonable risk these rules won't be followed.
- 1.4 We have concerns about the safety of having freedom camping vehicles pulling in and out of rural roads, some of which have speed limits of up to 100km ph.
- 1.5 By allowing freedom camping on rural roads, we feel there is a risk of compromising the visual amenity of our most iconic landscapes, in a region internationally renowned for its outstanding natural beauty.

**2.0 Freedom camping on urban roads**

- 2.1 We support the proposal to prohibit freedom camping on urban roads in the district
- 2.2 We support the proposal to provide allocated spaces in the proposed areas.
- 2.3 To support a fair and equitable approach for freedom camping visitors, we would like to see spaces in urban areas made bookable online.

Thank you for taking the time to consider our feedback.

If you have any questions, please don't hesitate to contact me.

Yours sincerely,



Mat Woods  
Chief Executive  
Destination Queenstown and Lake Wānaka Tourism

# QUEENSTOWN LAKES DISTRICT COUNCIL

## Submission on the Draft Freedom Camping Bylaw 2025

### INTRODUCTION

1. This submission is made on behalf of Montreal Trustees 2024 Limited (the **'submitters'**) by Town Planning Group Limited.
2. The submitters wish to speak to this submission.
3. This submission is lodged late due to the submitter not receiving the public notice. It is greatly appreciated if this submission can be accepted for consideration given these circumstances.
4. The submitter is opposed to the approach taken to freedom camping in the draft bylaw, particularly the proposal to "allow freedom camping on most rural roads" in the district.
5. As a point of immediate issue, the mapping in Schedule 1B of the draft bylaw is very unclear, with the legend obscuring certain roads. This makes it difficult to determine which roads are prohibited and has made it very difficult to provide feedback on this bylaw. Also, some mapping appears to show prohibitions over private land without explanation.

### CONCERNS

6. While the submitter has concerns with the bylaw as a whole, it has specific issues with how the bylaw deals with freedom camping on:
  - a) Ruby Island Road
  - b) Wanaka Mount Aspiring Road
7. The submitter also has a significant concern with the failure of the bylaw to adequately address the issues of providing for accommodation on legal roads, and the interaction of that matter with the Queenstown Lakes District Plan (PDP) – including the need for resource consents.
8. Furthermore, the traffic assessment is extremely limited and fails to properly assess health and safety impacts of not prohibiting freedom camping on rural roads.



9. **Ruby Island Road** has a grass verge which is predominantly long dry grass and shrubbery which poses as a significant fire hazard. This risk of fire has significant potential effects to adjoining private land. Upkeep of this road has been sporadic and generally ineffective (as by its nature, enforcement is reactive to an issue that occurs).



**Figure 1** Ruby Island Road berm

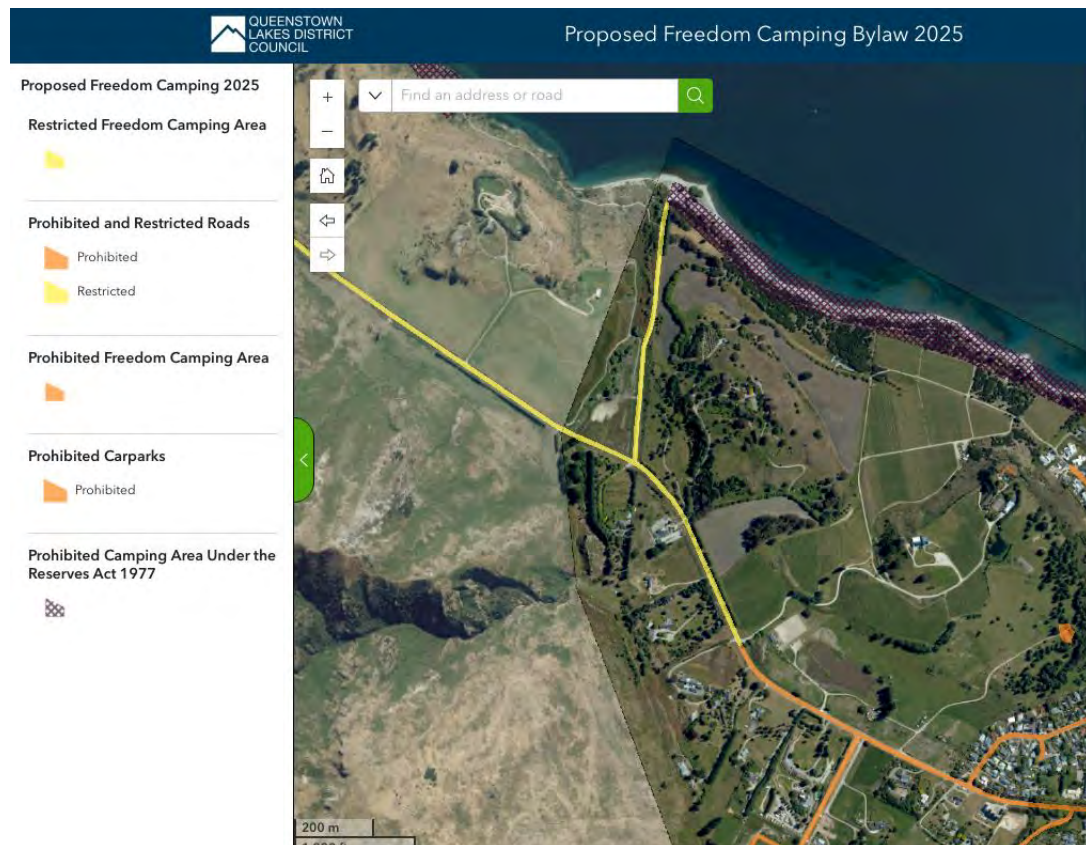


**Figure 2** Ruby Island Road berm

10. The submitter has experienced trespassing issues since purchasing the property and the proposed bylaw will increase the potential issues arising. Being in a rural zone there is also potential issues with pest control activities should people be camping along the boundary and throwing their scraps out to the roadside.
11. The impact of freedom camping adjacent to the Waterfall Creek gathering place is far greater than other activities within the immediate vicinity given the proximity and potential impact on water from Waterfall Creek. It is questioned whether Iwi have been consulted with in the preparation of the Bylaw.
12. Further, Ruby Island Road does not have a sealed area more than 5 metres from the edge of the road available and hence would not meet the criteria in section 8.3 of the draft bylaw. It will be confusing to persons looking for locations to freedom camp, if roads which cannot meet the criteria are included in the restricted list. Ruby Island Road should be listed entirely as a prohibited

freedom camping area as it cannot meet the relevant safety criteria for freedom camping.

13. **Wanaka Mount Aspiring Road** looks to have been prohibited for part of its extent, but not as far as the submitters' property at 280 Mount Aspiring Road, Wanaka.



**Figure 3** Ruby Island Road and Wanaka Mount Aspiring Road identified as Restricted Freedom Camping Areas

14. This road is a good example of how freedom camping on rural roads does not work. This road is a narrow and shared road, meaning cyclists, walkers and cars share the carriageway. The road has a speed limit of 100km/h; it is a high-speed environment. Further, the road is frequently used by large tractors and trucks associated with the surrounding farms. These factors create significant health and safety risks. Adding freedom camping will reduce community access and exacerbate traffic safety issues.



**Figure 4** Wanaka Mount Aspiring Road near the Ruby Island Road intersection

15. The T&T Technical Report (p.v) states:

*“Where the speed limit of a road is 70 km/h or higher... a hard constraint is applied... freedom camping is not recommended... in order to protect health and safety.”*

16. The draft bylaw does not apply this principle consistently, as Ruby Island Road and Wanaka Mount Aspiring Road remain enabled for freedom camping.

17. The requirement for vehicles to be self-contained bring about concerns with waste from campers and vehicles along with property security/ trespassing, etc. The large number of roads where freedom camping is enabled in the District will make it difficult by virtue of scale for Council to enforce the rules.

18. The Submitter also notes that the physical road does not fall entirely within the legal road corridor and in some places crosses into private property. It is inappropriate to enable freedom camping on private property without the owners consent.

19. All of the above issues represent a considerable health and safety risk which, under the Freedom Camping Act, must be excluded by way of prohibition of freedom camping on those roads and areas.

20. The above examples may well have commonalities with other roads in the district. Further work should be undertaken on the bylaw before it is in a state that can be adopted by the QLDC.



## CONFLICT WITH QUEENSTOWN LAKES DISTRICT PLAN (PDP)

21. Further to the point made above, the technical reporting accompanying the bylaw fails to address the conflict with the PDP, namely roads have zoning provisions that require a discretionary activity consent for freedom camping / accommodation on a road. Allowing freedom camping in these locations without addressing this creates operational and legal risks for QLDC.

22. For context, the purpose of the transportation chapter of the PDP (29.1) states (emphasis added):

*“The purpose of this chapter is to manage works within the road, manage the development of transport infrastructure both on and off roads, and to require that land-use activities are undertaken in a manner that maintains the safety and efficiency of the transport network as a whole and contributes positively to improving the public and active transport networks. The chapter also establishes the strategy for car parking in the District.*

*A well-managed transport network needs to be safe and efficient and provide for all modes of transport. As a result, it will facilitate compact and efficient land-use, which will contribute positively to limit increases in the use of fossil fuels and greenhouse gas emissions.*

*...*

23. In some circumstances, the proposed freedom camping designations specifically enabled under the bylaw could give rise to high traffic generating activity, particularly in areas that are located close to amenities such as trails, river and scenic viewing locations.

24. As a discretionary activity, freedom camping would have a range of adverse effects that would need to be considered, including health and safety (including road safety).

25. The bylaw addresses the PDP in other areas of the district (noting it as a constraint in many cases – such as in urban areas, the event centre), but not with respect of the zoning where freedom camping is enabled in the bylaw. This oversight should be resolved now, rather than leaving QLDC and ratepayers exposed to future enforcement costs and legal challenge.

26. The submitters suggest that the way to resolve this critical issue is to:

- a) amend the bylaw to prohibit freedom camping on legal roads; and

- b) the QLDC obtain resource consents for those dedicated freedom camping locations under the bylaw.

## SUMMARY & RELIEF SOUGHT

27. In summary, the draft bylaw poses unacceptable health and safety risks, conflicts with the PDP, threatens the accessibility of rural roads, fails to protect areas that require protection from freedom camping, and is currently underpinned by incomplete technical assessment. The submitter seeks changes to ensure the bylaw is lawful, robust, enforceable, and consistent with other statutory requirements.

28. The submitter requests relief that, without limitation, addresses the issues raised in this submission. This includes:

- a) The complete prohibition of freedom camping on:
  - i. Ruby Island Road
  - ii. Wanaka Mount Aspiring Road from the Wanaka urban area up to at least 402 Wanaka Mount Aspiring Road.
- b) The matters outlined in paragraph 6 under conflict with Queenstown Lakes District Plan (PDP) above.

29. The submitter is happy to further discuss the content of this submission with QLDC staff where that is of assistance.

Signed:



13 August 2025

Samantha Kealey  
Town Planning Group  
On behalf of Montreal Trustees Limited



Town Planning Group Limited  
Christchurch, 8140

8 August 2025

Queenstown Lakes District Council

Via email: [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

To Whom It May Concern,

**RE: SUBMISSION ON DRAFT FREEDOM CAMPING BYLAW 2025**

This submission is in regard to the proposed Freedom Camping Bylaw 2025 and is provided on behalf of Waterfall Park Developments Limited (**WPDL**) (**the submitter**), in relation to Waterfall Park (including Northbrook Arrowtown), Ayrburn and its related surrounds (Ayrburn).

WPDL owns Ayrburn, a hospitality precinct and Northbrook Arrowtown which is a later living development, located within the Waterfall Park and Wakatipu Basin Rural Amenity Zones, which is accessed via Ayr Avenue, off Arrowtown Lake Hayes Road.

The submitter acknowledges the need for a Freedom Camping Bylaw and appreciates the opportunity to provide feedback on the draft, it seeks amendments to the proposed 'restricted freedom camping areas' to address the exact locations that will allow freedom camping within the Wakatipu Basin, specifically within proximity to Ayrburn.

The amendments sought are set out in **Appendix 1** below. **Appendix 2** identifies the relevant roads that relate to this feedback.

The district is a popular tourist destination that provides nationally significant economic benefits, however the submitter believes that by allowing freedom camping on most rural roads (provided compliance with specific standards is achieved) the amenity values of the district (celebrated by locals and visitors alike) will be diminished. The submitter would like to utilise this consultation process to develop a proactive Bylaw that provides for visitor demands whilst also implementing effective management methods that protect the high quality of environment that both local residents and visiting freedom campers intend to experience.

The submitter would like to be heard in person before a hearing panel.

## APPENDIX 1

**Table 1** below outlines the Draft Bylaw provisions, the submitter's position on the provisions, justification and the relief sought.

| Proposed Bylaw Provisions:    | Position:  | Justification:   | Relief Sought:   |
|-------------------------------|--|--|--|
| Part 1 Clause 3.1             | The submitter opposes the purpose of the proposed Bylaw to ensure that the area and the health and safety of people who may visit the area is protected.   | By allowing for freedom camping on most rural roads throughout the district, the purpose of the Bylaw is unlikely to be achieved without a significant compliance cost to Council and ratepayers.  | The submitter requests that the Waterfall Park and Arrowtown-Lake Hayes rural roads are specifically prohibited from freedom camping for the benefit of the area/environment, visitors and local residents, as well as other rural roads where appropriate.  |
| Part 2 Clause 8 Schedule 1B   | The submitter opposes the fundamental premise of the Bylaw in the oxymoron of using the word 'restricted' as a prefix to roads and areas where 'freedom camping' is effectively provided for, subject to compliance with the conditions. | The design of the Bylaw to allow for Freedom Camping Areas subject to restrictive conditions that are likely to be unenforceable will create risks to public safety and contradict Clause 3 (Purpose) of the Bylaw.  | The submitter requests that the Waterfall Park and Arrowtown-Lake Hayes rural roads are removed as Restricted Freedom Camping Areas and are otherwise identified as prohibited areas.  |
| Part 2 Clause 8.3 Schedule 1B | The submitter opposes the inclusion of Waterfall Park Road and Arrowtown-Lake Hayes Road as Restricted Freedom Camping Areas, particularly.  | <p>By allowing freedom camping on Waterfall Park Rd and Arrowtown-Lake Hayes Road, the Bylaw is unlikely to maintain the Wakatipu Basin's landscape character and visual amenity values. A site-specific assessment has not been undertaken on Waterfall Park Rd and Arrowtown-Lake Hayes Rd to determine whether or not the conditions outlined in Clause 8.3 are realistically achievable on Waterfall Park Rd in particular. Until this is proved otherwise, all rural roads should be classed a Prohibited Freedom Camping Areas. Further concerns arise in relation to providing for restricted freedom camping on these roads including:</p> <ul style="list-style-type: none"> <li>It is unclear how any effective monitoring and enforcement will be able to be undertaken in</li> </ul> | <p>As per the above, the submitter seeks the removal of Waterfall Park and Arrowtown-Lake Hayes rural roads from the mapping that identifies Restricted Freedom Camping Areas.</p> <p>Noting the outcome of the <i>New Zealand Motor Caravan Association Inc v Queenstown Lakes District Council</i> [2024] NZHC 2729, the submitter still holds concerns in respect of adverse effects on amenity values, rural character, and outstanding natural landscape values</p> |



|            |   |  |   |
|------------|---|--|---|
|            |   | <p>these locations, and in respect of the conditions as to maximum nights of stay and parking locations from the edge of roads;</p> <ul style="list-style-type: none"> <li>• The unenforceability of these areas due to their location, accessibility, and frequency of use has not been adequately considered;</li> <li>• no site-specific assessment has been undertaken for these roads to assess their suitability for freedom camping and whether further restrictions / prohibitions are required under section 11 of the Freedom Camping Act 2011.</li> <li>• The nature and location of these roads may encourage freedom camp users to trespass into private property, which in the case of Ayrburn is currently under significant and construction stages posing health and safety concerns.</li> <li>• Although freedom campers are expected to camp in a way that complies with the bylaw and other existing bylaws / laws relating to their behaviour, freedom camping has been associated with an increase in anti-social behaviours and an increase in littering of waste. These behaviours have been acknowledged in the technical assessment that informed the development of the bylaw</li> </ul> <p>The submitters position on this specific clause and schedule is further supported by the two positions addressed above.</p> |   |
| Schedule 2 | The submitter seeks amendments to Schedule 2 to add Waterfall Park Rd | Figure 1.3 of Appendix C in Tonkin and Taylor's (T+T) Full Technical Assessment (June, 2025) on Freedom Camping Bylaw Development, identifies Arrowtown Lake Hayes Road to be a 'Hard Constraint Area',  | The submitter requests that the Bylaw is amended to ensure Freedom Camping in Hard and Considered Constraint Areas. Waterfall Park Road and Arrowtown Lake Hayes Road |

|                 |   |   |  |
|-----------------|---|---|--|
|                 | and Arrowtown Lake Hayes Rd to the Prohibited Freedom Camping Areas.  | <p>resulting in a high adverse impact where it is unlikely that restrictions or control conditions are sufficient to reduce the impact/protect the area, access and/or health and safety of people visiting the area. T+T's technical assessment specifically states that Freedom Camping is not recommended in Hard Constraint Areas. Waterfall Park Road is identified to have a moderate adverse impact but effective compliance monitoring and enforcement by the territorial authority is unrealistic.</p> <p>The landowners will have no ability to enforce freedom camping in accordance with the bylaw and will be burdened with assisting stranded campers and any clean up required when freedom campers depart.</p>  | should not be enabled as freedom camping areas, and rather identified as Prohibited Freedom Camping Areas.   |
| Overall comment | The submitter otherwise opposes any other parts of the Draft Bylaw as necessary in order to address the concerns and issues set out in this submission. | <p>There are other rural roads in the vicinity of Arrowtown which are more suitable for freedom camping. Identifying designated areas rather than rural roads will be safer for freedom campers and will be monitored more frequently by QLDC. In summary of the reasons in opposition to the inclusion of Waterfall Park and Arrowtown Lake Hayes Road specifically, the submitter requests those areas be prohibited for freedom camping to:</p> <ul style="list-style-type: none"> <li>• Protect the area – Freedom camping is associated with anti-social behaviours that adversely impact areas where camping is permitted. This includes littering and the disposal of noxious waste.</li> <li>• Protect health and safety of people who may visit the area – including those engaged in construction and operation of the Ayrburn Precinct.</li> </ul> | In the alternative to the submission points set out above, the submitter seeks any consequential alteration, or other necessary relief to address the concerns and issues raised in this submission. |

## APPENDIX 2



**Figure 1.** identifying Arrowtown Lake Hayes Road and Waterfall Park Road as Restricted Freedom Camping Areas under the Proposed Bylaw.



**Figure 2.** is an excerpt of T+T's Technical Assessment showing Arrowtown Lake Hayes Rd as a Hard Constraint Area (in orange) and Waterfall Park Rd (in yellow) as a Considered Constraint Area.



This submission is on behalf of Central Otago Whitewater.

My name is Tony Ward-Holmes. I am a member of Central Otago Whitewater, the main kayaking club for the QLDC as well as the CODC areas. I am a former member of the board of Whitewater NZ, the peak national body for whitewater kayaking, and am currently Whitewater NZ's representative for the Hāwea Whitewater Park.

This submission is primarily in regards to freedom camping at two areas, along Rafters Rd, and at the carpark at Camp Hill Rd on the corner with the Hāwea River. First I would like to provide some context.

### **Context**

Freedom camping has occurred since the first human set foot on Aotearoa. It has changed significantly over time though, with this century seeing a new type of freedom camping characterised by use of campervans, networking online, and a massive increase in numbers doing it. The excessive numbers of freedom campers began to have negative effects on local communities before covid and again more recently, in many sites such as the north shore of Lake Hayes, Rafters Rd in Gibbston, and Park St in Queenstown.



*Illegal freedom camping on a bare private section in Park St, Queenstown*

I'd like to highlight the networking that now goes on, which means management isn't just a matter of dealing with increasing numbers, it's a matter of dealing with an active movement to work around laws and other rules. This quote is from the ODT:

*"Queenstown Lakes District Council regulatory manager Lee Webster".. "said part of the problem facing the council was how quickly word spread on social media of "free" campsites. Social media, it can react a lot faster than we can, particularly where they find a piece of land that someone has just brazenly gone on and trespassed to, then, 'there's a great location here, no-one bothers you' or 'no-one can bother you'"*

The increase in numbers has outstripped plans and laws to manage them. According to the Statement of Proposal, *"It is estimated that the number of international visitors practicing freedom camping rose from 10,000 to 123,000, in the decade between 2008 and 2018".*

Freedom camping numbers, like all tourism numbers, are expected to grow even further though. From 10,000 to 123,000, between 2008 and 2018, works out to be a 28.5% per annum growth rate. If that rate continues, after allowing for a 5-year pause due to covid, we would have over 250,000 by 2026, over 500,000 by 2029, over 1,000,000 by 2032, and over 10,000,000 by 2041.

Presumably the latter number isn't going to happen for all sorts of reasons, but one is that locals would not stand for every road and park being lined by piles of faeces and eventually would force a change in laws. There is no reason however to progress to the point where pain forces a change. Instead, council should fulfil the Freedom Camping Act by allowing freedom camping at a small number of major sites that are efficient to manage, such as Red Bridge and the Wanaka Recreation Centre, and leave it at that.

## **Rafters Road**

The draft bylaw zones Rafters Rd as "restricted" for freedom camping, as opposed to "prohibited" in the quashed 2021 bylaw. This road meets the Kawarau River at the end of what kayakers and rafters call the "Dog-leg" section, and the reserve at the bottom has been used by literally generations of rafters and kayakers as the take-out from the river, a meeting point, a place to have lunch and, yes, a place to camp back when there weren't hundreds of people. But with the advent of mass freedom camping, the carpark for the reserve turned into wall-to-wall campervans, the toilet overflowing, piles of faeces all over the place and a consequent reduction in use by the local community.

Freedom camping issues in the QLDC area have been reported in numerous articles in the ODT. It is worth quoting much of the first one about Rafters Rd, on 21 March 2016:



*"A Gibbston resident has described a riverside freedom-camping site near his home as being like a "Syrian refugee camp".*

*Up to 200 people a night are cramming into a car park next to the Rum Curries camping area, which has one long-drop toilet, at the end of Rafter's Rd, next to the Kowarau River.*

*The Department of Conservation manages the site and staff admit it is overcrowded and campers are defecating outside and leaving rubbish.*



*Staff intend to raise the issue with police. Building contractor Brandon O'Callaghan has lived across the highway from Rafter's Rd for 11 years.*

*He said during the past six months it had been "like living in a camping ground", with the number of people staying at the car park.*

*Tourists recently knocked on his door asking to camp in his backyard because the site was full and he had heard campers were defecating in the river because the toilet was overflowing.*

*"It is ridiculous," Mr O'Callaghan said.*

*"It used to be one or two kayakers; that would be it. But in the last couple of months it's gone up tenfold.*

*"It's not just summer. It wasn't just over Christmas. It's every night.*

*"And now it's out of control ... In the last few months it's just gone ballistic. How many more are going to come?"*



*Dave Henderson and wife Kristina Buxton live over the fence from the site.*

*"Parts of that property can not now be walked on because they are so covered in human shit," Mr Henderson said.*

*"There are no rubbish bins down there so litter blows all over our property."*

*Landowners in many parts of the country have raised concerns about noise, sanitation and waste in relation to freedom camping.*

*Earlier this week, the Otago Daily Times reported up to 30 people, primarily sleeping in cars, had taken over privately-owned land in Park St, Queenstown.*

*Mr O'Callaghan said that was nothing compared with the Gibbston site, with its "endless" stream of traffic, bass-driven music cranking, and rubbish and toilet paper strewn everywhere.*

*"It's like a camping ground on New Year's Eve every night and on a Saturday night it just goes nuts."*

*Doc Wakatipu operations manager Geoff Owen admitted the site was overcrowded and campers were defecating on the site and leaving rubbish.*

*Mr Owen met Queenstown Lakes District Council staff earlier this week to discuss how to tackle the problem - and intends raising the issue with police.*

*"People see it as a place to camp free and it was never designed to do that," Mr Owen said.*

*"It was never designed to take the number of vehicles that have been experienced down there.*

*"It does pose an issue for my staff because we're having to clean up after them and, to me, that's not satisfactory."*

And another quote from the same article that I'd like to highlight:

*"Communities like Queenstown, which will just become more popular, at all levels of tourism, need to be creative and realistic about solving this issue."*

The Freedom Camping Act may default to permitting freedom camping on council land, but it does allow exceptions where there are access or health and safety effects. I think a reasonable start point for the new bylaw is that freedom camping is prohibited from all sites where there is a documented history of negative effects on access or health and safety, and Rafters Rd is clearly one of those.

Most of the parking area at the bottom of Rafters Rd is not part of the DOC reserve, hence zoning Rafters Rd as “restricted” will bring back the problems of 2016 thru 2020 only with even more numbers.



*The green areas marked on this map of the bottom of Rafters Rd are two DOC reserves, as shown on [doc.govt.nz/map/](http://doc.govt.nz/map/).*

*Much if not all of the carpark in the middle is not reserve and is part of Rafters Rd.*

The problems due to freedom camping at Rafters Rd were in a smaller area but otherwise were very similar to the even more notorious problems at the north shore of Lake Hayes. The problems had a similar negative effect on access by the local community, and health and safety due to faeces everywhere. The access road to the north shore of Lake Hayes is prohibited for freedom camping in the proposed bylaw, and for the same reason Rafters Rd should also be prohibited for freedom camping.



## **Camp Hill Rd**

The draft bylaw allows 15 campervans to freedom camp at the true-left carpark on the corner of Camp Hill Rd and the Hāwea River. This carpark is adjacent to the Hāwea Whitewater Park, which was built by Contact Energy on negotiation with Whitewater NZ and Central Otago Whitewater. It is mitigation for loss of rapids such as Sargoods Weir, Bannockburn, the Cromwell Gap and many Roxburgh gorge rapids that are now under the waters of Lake Dunstan and Lake Roxburgh.

Unlike all other sites in Upper Clutha, it is not proposed to mark exact camping places at Camp Hill Rd, nor restrict camping times or durations.

Allowing a fixed number of campers but not marking places means the fixed number is unenforceable. Arrival #37 just claims to have arrived before arrival #10, etc. The true-left carpark would basically turn into another Luggate Red Bridge except overflowing more often because a) it is a nicer site, b) it is a quieter site, c) it is smaller, and d) freedom camping numbers are growing rapidly. It would be inevitable that campers would spill over, in considerable numbers, across the bridge into the true-right carpark.

The true-right carpark was built by Central Otago Whitewater, by permission of DOC, on marginal strip reserve. Access to it is via a narrow strip of private land. Central Otago Whitewater and Whitewater NZ are beneficiaries of an access easement across that private land, but only so long as nobody camps in the carpark because the landowner is extremely concerned about fire risk to their adjacent pine forest. If freedom camping becomes established in the true-right carpark COW and WNZ, and thus everyone, will lose access to it.

The Hāwea Whitewater Park is very busy during scheduled river releases in summer, and has hosted many kayaking events such as the NZ Freestyle Nationals in 2013 and NZ Freestyle Team Selections in 2023, the NZ Canoe Slalom Nationals in 2014, the NZ Secondary School Canoe Slalom Champs in 2016 & 2018, the South Island Canoe Slalom Champs in 2018 & 2020, and many training camps by 10x world champion Claire O'Hara. During some of these events both true-right and true-left carparks were overflowing.



*The Hāwea Whitewater park, with the true-right carpark in the background. This becomes full with about 20 vehicles, all of which would need to park in the true-left carpark should the true-right carpark be closed due to spillover of freedom campers from true-left.*

Effects on the true-right carpark, due to freedom camping in the true-left carpark, would not normally be able to be considered under the Freedom Camping Act. In this case there is a knock-on effect however. Because freedom camping in the true-left carpark would cause loss of access to the true-right carpark, everyone who would have parked on true-right would then have to park in the true-left carpark that is proposed for freedom camping.

We are also aware that usage will ramp up in both carparks due to the Upper Clutha Track Trust building a new true-right track between the Hawea dam and the true-right carpark. Combined with the currently existing true-left track that will form the only river loop track in Upper Clutha and will become multiple times more popular than the current there-and-back track by itself.

The impact of freedom camping in the true-left carpark would be the denial of access to that area for walkers, bikers, kayakers, surfers, sightseers, schools, polytechs, clubs and everyone else that parks there. Usage will increase substantially due to the forthcoming Hāwea River loop track, and even more so should the true-right carpark be

lost due to spillover from freedom camping on true-left. The negative effects on access are to an extent that freedom camping should not be allowed at all at the Camp Hill Rd true-left carpark.

At an absolute minimum, freedom camping should be reduced to at most 5 places, that are marked, have the usual restrictions on time and number of nights etc, and will be enforced.

### **Rural roads**

A technical issue with the wording of the bylaw may exist for rural unsealed roads.

The draft bylaw says one of the restrictions on rural roads is "*the side or part of the motor vehicle closest to the road (that is the carriageway) is located a minimum of 5 metres from the nearest edge of the road hard shoulder (where provided) or edge of seal (where no hard shoulder) at all times;*"

This does not seem to apply to unsealed roads. I was informed by council staff that "road hard shoulder" covers unsealed roads, however a hard shoulder is the escape lane on motorways or other major roads. The definition in the Cambridge dictionary is "a hard area at the side of a main road where a driver can stop". I think the bylaw should be explicit about minimum distance restrictions on unsealed roads, otherwise any unsealed rural road may be lined by rows of campervans.

### **Conclusion**

Central Otago Whitewater requests the zoning of Rafters Rd to prohibit freedom camping.

Central Otago Whitewater requests the zoning of the Camp Hill Rd carpark to prohibit freedom camping.

## Submission to QLDC Draft Freedom Camping Bylaw 2025

### Contact Address:

Secretary

[REDACTED], Wanaka 9382

The Guardians wish to speak to their submission.

This submission relates to the Hawea area, in particular Lake Hawea and its environs.

### Introduction

The Guardians of Lake Hawea are a sub-committee of the Hawea Community Association Incorporated. The aim is to ensure that Lake Hawea, its surrounds, water quality, biodiversity and ecosystems are protected, maintained, enhanced, and managed for the benefit of all.

We support the overall approach in this draft bylaw as it helps protect the health of Lake Hawea and immediate environs.

### Present situation

Prior to the High Court quashing the previous bylaw freedom camping by any vehicle and people with tents was prohibited on the Southern foreshore of Lake Hawea from the dam to Muir Road and the John Creek Recreation Reserve. These areas were monitored and policed by QLDC ambassadors and QLDC-appointed local wardens. This is no longer the situation and the 2025 draft bylaw does not include provision for Council to reestablish their surveillance of the whole foreshore – the immediate lake edge is LINZ land.

Signs erected by the Council last summer say that camping is prohibited by LINZ. However LINZ has no ability or funding to carry out any policing of the lake edge or lake bed. The 2 red areas on this sign and which say camping is prohibited by LINZ are too small; this sign is too wordy.



### What we want QLDC to do

The Guardians of Lake Hawea have three requests:

1. We urge QLDC to make an **enforcement agreement** with LINZ to support LINZ's mandate to prohibit freedom camping on the Southern foreshore of Lake Hawea and the Reserve at John Creek.

2. We ask the QLDC to redo the signs with wording that clearly states freedom camping is not permitted in these two areas. The bottom of new signs would have both LINZ and QLDC names on them.

The old no camping signs were excellent; they were 50cm by 30cm in size, so much bigger than the recently erected 15cm by 20cm signs that have appeared.



new sign



old sign

3. Reinstate the volunteer wardens to assist Ambassadors 'policing' and educating freedom campers on the Southern foreshore of Lake Hawea and the John Creek reserve. These volunteer wardens live locally so were very aware of infringements.

## What we support

1. Prohibition of camping around the streets of Lake Hawea
2. Provision of 15 spaces for camping at Camphill carpark – despite this being a well-used carpark for bikers, walkers and users of the white water kayaking facility. We ask that this site be monitored.
3. Restrictions associated with rural roads. These provisions should ensure that the streets of John Creek do not become places where vehicles attempt to freedom camp.

But we are concerned that campers, often non self-contained, can drive off Timaru Creek Road through long grass to the edge of the lake and are sometimes able to hide behind shrubbery where they are hard to detect. In theory there is meant to be no camping on LINZ land but LINZ has no funding to enforce this.

The Guardians want to protect the health of the lake, particularly as past behaviour has put this at risk.

# QUEENSTOWN LAKES DISTRICT COUNCIL

## Submission on the Draft Freedom Camping Bylaw 2025

### 1. INTRODUCTION

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- 1.1 This submission is made on behalf of Malaghans Investments Ltd (“**MIL**”).
- 1.2 The submitter resides in rural Queenstown.
- 1.3 The submitter wishes to speak to this submission.
- 1.4 This submission is lodged late due to the submitter being overseas with limited internet access at the time. It is greatly appreciated if this submission can be accepted for consideration given these circumstances.
- 1.5 The submitter is opposed to the approach taken to freedom camping in the draft bylaw, particularly the proposal to “allow freedom camping on most rural roads” in the district.
- 1.6 As a point of immediate issue, the mapping in Schedule 1B of the draft bylaw is very unclear, with the legend obscuring certain roads (e.g. Coronet Peak Station Road). This makes it difficult to determine which roads are prohibited and has made it very difficult to provide feedback on this bylaw. Also some mapping appears to show prohibitions over private land without explanation.

### 2. CONCERNS

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- 2.1 While the submitter has concerns with the bylaw as a whole, it has specific issues with how the bylaw deals with freedom camping on:
  - (a) Coronet Peak Station Road
  - (b) Malaghans Road
  - (c) Skippers Road
  - (d) Branches Road
- 2.2 The submitter also has a significant concern with the failure of the bylaw to adequately address the issues of providing for accommodation on legal roads, and the interaction of that matter with the Queenstown Lakes District Plan (**PDP**) – including the need for resource consents.
- 2.3 Furthermore, the traffic assessment is extremely limited and fails to properly assess health and safety impacts of not prohibiting freedom camping on rural roads.



- 2.4 **Coronet Peak Station Road** has experienced persistent issues with freedom camping since the establishment of the mountain bike trails and, more recently, the Wharehuanui Trail. Enforcement has been sporadic and generally ineffective (as by its nature, enforcement is reactive to an issue already occurring). The submitter has little confidence the bylaw will be enforced effectively. This stresses the importance of getting the prohibitions in the bylaw right from the outset.
- 2.5 Coronet Peak Station Road is a good example of how freedom camping on rural roads does not work. This road is a narrow shared road, meaning cyclists, walkers and cars share the narrow carriageway. The road does not have a speed limit, therefore it is a 100km speed environment. Coupled with this, the road is frequently used by large tractors and trucks associated with the surrounding farm. Campers use the roadside for their toilet and hang washing on the farm fences to dry. The campervans are too large to fit within the legal road without compromising the road carriageway. These factors create significant health and safety risks. Adding freedom camping will reduce community access and exacerbate traffic safety issues.
- 2.6 **Malaghans Road** is a key arterial road in the district and is predominantly 100km/h. It is a high speed environment and is not suitable in any form for roadside freedom camping.
- 2.7 Below are examples of some of the congestion and safety hazards at the Malaghans / Coronet Peak Station Road intersection *prior* to the opening of the Wharehuanui Trail (c.2021) which now further constrains the legal road and creates further activity in this location.





2.8 At the Malaghans/Coronet Peak Station Road intersection, a large gravel road reserve is used informally for parking, particularly by QLDC contractors in large trucks. This already impairs sight distances for vehicles exiting the road. Freedom camping here would worsen the hazard. The proposed “controls” in the bylaw would not address this significant risk.

2.9 The T&T Technical Report (p.v) states:

*“Where the speed limit of a road is 70 km/h or higher... a hard constraint is applied... freedom camping is not recommended... in order to protect health and safety.”*

2.10 The draft bylaw does not apply this principle consistently, as Malaghans Road and Coronet Peak Station Road remain enabled for freedom camping.



- 2.11 **Skippers Road and Branches Roads** are enabled for freedom camping under the bylaw. What is most concerning is that it does not appear that the technical reports considered these roads and the back country nature of how they function within the QLDC roading network. Furthermore, no consideration has been given to hazard risks. The submitter suggests that the faction of the QLDC dealing with this bylaw talks to the faction of the QLDC dealing with zone appeals to the PDP, who are well versed on these roads and their functions.
- 2.12 Skippers Road has numerous pull over bays along its length. These areas are important for the safety of road users. What the bylaw does is enable those areas to be used for accommodation and the congregation of campervans. This would have the effect of constraining access to the area and creating significant health and safety risks to road users.
- 2.13 Skippers and Branches Roads are protected heritage features. These fragile heritage areas should remain protected under the bylaw by prohibiting freedom camping and campervans on these roads.
- 2.14 These remote areas are also likely to not be enforced by the QLDC. Having a clear prohibition at the start of the road would be an effective deterrent, alongside the numerous other safety warning signs at the start of Skippers Road.
- 2.15 These rural locations are not close to public facilities. Existing informal use as toilets and for drying clothes on farm fences indicates a high risk of further waste and rubbish issues.
- 2.16 All of the above issues represent a considerable health and safety risk which, under the Freedom Camping Act, must be excluded by way of prohibition of freedom camping on those roads and areas.
- 2.17 The above examples may well have commonalities with other roads in the district. Further work should be undertaken on the bylaw before it is in a state that can be adopted by the QLDC.

### **3. CONFLICT WITH QUEENSTOWN LAKES DISTRICT PLAN (PDP)**

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- 3.1 Further to the point made above, the technical reporting accompanying the bylaw fails to address the conflict with the PDP, namely roads have zoning provisions that require a discretionary activity consent for freedom camping / accommodation on a road. Allowing freedom camping in these locations without addressing this creates operational and legal risks for QLDC.

- 3.2 For context, the purpose of the transportation chapter of the PDP (29.1) states (emphasis added):

*“The purpose of this chapter is to manage works within the road, manage the development of transport infrastructure both on and off roads, and to require that land-use activities are undertaken in a manner that maintains the safety and efficiency of the transport network as a whole and contributes positively to improving the public and active transport networks. The chapter also establishes the strategy for car parking in the District.*

*A well-managed transport network needs to be safe and efficient and provide for all modes of transport. As a result, it will facilitate compact and efficient land-use, which will contribute positively to limit increases in the use of fossil fuels and greenhouse gas emissions.*

*...”*

- 3.3 In some circumstances, the proposed freedom camping designations specifically enabled under the bylaw could give rise to high traffic generating activity, particularly in areas that are located close to amenities such as trails, river and scenic viewing locations.
- 3.4 As a discretionary activity, freedom camping would have a range of adverse effects that would need to be considered, including health and safety (including road safety).
- 3.5 The bylaw addresses the PDP in other areas of the district (noting it as a constraint in many cases – such as in urban areas, the event centre), but not with respect of the zoning where freedom camping is enabled in the bylaw. This oversight should be resolved now, rather than leaving QLDC and ratepayers exposed to future enforcement costs and legal challenge.
- 3.6 The submitter suggests that the way to resolve this critical issue is to:
- (a) amend the bylaw to prohibit freedom camping on legal roads; and
  - (b) the QLDC obtain resource consents for those dedicated freedom camping locations under the bylaw.

#### **4. SUMMARY & RELIEF SOUGHT**

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- 4.1 In summary, the draft bylaw poses unacceptable health and safety risks, conflicts with the PDP, threatens the accessibility of rural roads, fails to protect areas that require protection from freedom camping, and is currently underpinned by incomplete technical assessment. MIL seeks changes to ensure the bylaw is lawful, robust, enforceable, and consistent with other statutory requirements.

4.2 The submitter requests relief that, without limitation, addresses the issues raised in this submission. This includes:

(a) The complete prohibition of freedom camping on:

- i. Malaghans Road
- ii. Coronet Peak Station Road
- iii. Skippers Road
- iv. Branches Road

(b) The matters outlined in paragraph 3.6 above.

4.3 The submitter is happy to further discuss the content of this submission with QLDC staff where that is of assistance.

Signed:



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11 August 2025

Malaghans Investments Ltd  
C/- Brett Giddens  
[REDACTED]  
RD1, Speargrass Flat  
Queenstown 9349  
[REDACTED]

8 August 2025

Queenstown Lakes District Council

Via email: [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

To Whom It May Concern,

**RE: SUBMISSION ON DRAFT FREEDOM CAMPING BYLAW 2025**

This feedback is in regard to the proposed Freedom Camping Bylaw 2025 and is provided on behalf of Bell Group Limited Partnership (**BGPL**) (**the submitter**), who own Criffel Station in Wanaka.

The submitter acknowledges the need for a Freedom Camping Bylaw and appreciates the opportunity to provide feedback on the draft; it seeks amendments to the proposed Bylaw as set out in **Appendix 1** below.

The district is a popular tourist destination that provides nationally significant economic benefits, however the submitter believes that by allowing for freedom camping on most rural roads, the high amenity values of the district (celebrated by locals and visitors alike) will be diminished. Furthermore, the provision of freedom camping on rural roads will interfere with the operational requirements of working farms and other businesses across the district.

The submitter would like to utilise this consultation process to develop a proactive Bylaw that provides for visitor demands whilst also implementing effective management methods that protect the high quality of environment that both local residents and visiting freedom campers intend to experience.

The submitter would like to speak to this submission before a hearing panel.

## APPENDIX 1

**Table 1** below outlines the Draft Bylaw provisions, Criffel Station's position on the provisions, justification and the relief sought.

|    | Proposed Bylaw Provisions:     | Position:  | Justification:   | Relief Sought:  |
|----|--------------------------------|--|--|---|
| 1. | Council Report (Items 36-39)   | The submitter opposes that Council is adopting a Bylaw without adequate site-specific assessments.   | Item 37 of the Council Report states that "it is not practical to undertake a site-specific assessment of every location" prior to the Bylaw being adopted by the end of October 2025. Based on that statement how can the Council recommend a report that contradicts the decision of the High Court decision in 2024 that triggered this new Bylaw being proposed in the first case. Adopting the Bylaw on Rural roads without an adequate impacts assessment undermines the integrity of the Bylaw and fails to achieve the Bylaw's purpose (Clause 3). | The submitter requests that freedom camping is prohibited on rural roads unless site specific impact assessments recommend freedom camping suitability. Furthermore, the submitter would like to see engagement by Council with rural communities to implement solutions that balance visitor demands with local rural residents needs and wellbeing, whilst also preventing environmental degradation. |
| 2. | Part 1 Clause 3.1              | The submitter opposes the purpose of the proposed Bylaw to ensure that the area and the health and safety of people who may visit the area is protected. | By allowing for freedom camping on most rural roads throughout the District, the Council cannot adequately achieve the purpose of the Bylaw, without a significant compliance cost.  | The submitter requests that rural roads are prohibited from freedom camping for the benefit of the area/environment, visitors and local residents.  |
| 3. | Part 2 Clause 8<br>Schedule 1B | The submitter opposes the fundamental premise of the Bylaw in the oxymoron of using the word 'restricted' as a prefix to 'freedom camping'.              | The design of the Bylaw to allow for Freedom Camping Areas subject to restrictive conditions that are likely to be unenforceable will create risks to public safety and contradict Clause 3 (Purpose) of the Bylaw.  | The submitter requests that rural roads are removed as Restricted Freedom Camping Areas and that the Council identify specific sites as permitted Freedom Camping Areas, subject to conditions in order to reduce confusion for visitors and local residents. A benefit of this change in provision would be the simplification of compliance and   |

|    |                                  |  |   |  |
|----|----------------------------------|--|---|--|
|    |                                  |  |   | monitoring due to clearer understanding of the Bylaw provisions.   |
| 4. | Part 2 Clause 8.3<br>Schedule 1B | The submitter seeks amendments to Schedule 1B to remove rural roads from the Restricted Freedom Camping Areas. | By allowing freedom camping on most rural roads the Bylaw is unlikely to maintain the Wakatipu Basin's landscape character and visual amenity values. Until this proved otherwise by site-specific assessments, all rural roads should be classed a Prohibited Freedom Camping Areas. The submitters position on this specific clause and schedule is further supported by the two positions addressed above.   | The submitter requests that Mt Barker Road is removed the restricted freedom camping areas, as provided by the Draft Freedom Camping Bylaw 2025.   |
| 5. | Schedule 2                       | The submitter seeks amendments to Schedule 2 to add Mt Barker Rd to the Prohibited Freedom Camping Areas.      | Appendix C in Tonkin and Taylor's (T+T) Full Technical Assessment (June 2025) on Freedom Camping Bylaw Development, does not classify Mt Barker Rd as a Constraint Area. Therefore, the Council cannot be satisfied that it is unlikely that restrictions or control conditions are sufficient to reduce the impact/protect the area, access and/or health and safety of people visiting the area. Effective compliance monitoring and enforcement of most rural roads across the District by the territorial authority is unrealistic. | The submitter requests that the Bylaw is amended to not provide for Freedom Camping on rural roads not addressed in the T+T Technical Assessment . |



**Table 2** identifies the submitter's general concerns with the overall intent of the Bylaw.

|     | General Concerns:  | Justification:   | Relief Sought:   |
|-----|--|--|--|
| 1.  | <p>Council Report (Items 36-39)</p> <ul style="list-style-type: none"> <li>- Lack of site-specific assessments</li> <li>- Lack of justification for Restrictions on Rural Roads</li> </ul> | <p>As addressed in the Council Report, item 37 states that no site-specific assessments have been carried out on rural roads. Item 39 of the Council Report states that the majority of previous infringements and complaints do not relate to rural roads. However, this data is skewed as under the previous Freedom Camping Bylaw most rural roads were prohibited areas and not subject to the proposed restricted conditions of the Draft 2025 Bylaw. This suggests that a more restrictive model is appropriate for managing freedom camping on rural roads.</p> | <p>As above in point 1.1, the submitter requests that freedom camping is prohibited on rural roads unless site specific impacts assessments recommend freedom camping suitability. Furthermore, the submitter would like to see engagement by Council with rural communities to implement solutions that balance visitor demands with local rural residents needs and wellbeing, whilst also preventing environmental degradation.</p> |
| 2.  | <p>Council Report (Items 67d)</p>  | <p>Item 67d. of the Council Report addresses the consideration of signage marking correct areas of freedom camping yet not every rural road in the District will be signposted with the Restricted conditions of freedom camping. `</p>  | <p>The submitter would like it to be noted that it is not feasible to accurately signpost every rural road that will become a 'Restricted Freedom Camping Area' under the Draft Bylaw.</p>   |
| 3.  | <p>Extra Burden on Private Rural Landowners</p>  | <p>Given the remoteness of many rural roads, enforcement of the bylaw will inevitably fall to rural landowners, which they do not have the authority to do so. It is expected that enforcement places the landowner in a challenging, and potentially unsafe, position, requiring them to confront campers and address issues without sufficient support from authorities given their remote location.</p>   | <p>The submitter would like acknowledgement from the Council of the unnecessary dangers this Bylaw may create for both visitors and landowners.</p>  |
| 4.  | <p>Enforcement and Compliance Challenges</p>   | <p>The allowance of freedom camping on rural roads, subject to specific conditions, is difficult to monitor and enforce consistently. Especially the conditions of a required setback of 5m from the carriageway and to be parked on a hard surface that does not obstruct traffic flow.</p>   | <p>The submitter requests these conditions are dropped and freedom camping on most rural roads is prohibited as per point 1.4 above.</p>   |
| 5.. | <p>Farming and Business Operational Interference</p>   | <p>Freedom campers will not respect or acknowledge the operational requirements of farms and other businesses on rural roads and within restricted freedom camping areas. They may inadvertently block access routes or interfere with stock handling, creating hazards for both animals and people. This has the potential to contradict the</p>  | <p>The submitter requests these conditions are dropped and freedom camping on most rural roads is prohibited as per point 1.4 above.</p>   |

|    |                                      |  |   |
|----|--------------------------------------|--|---|
|    |                                      | Purpose of the Draft Bylaw (Clause 3) by not protecting the health and safety of people who visit the area, as well as local residents and employees.  |   |
| 6. | Risk of Environmental Degradation    | Further to point 1.2 above and Clause 3 of the Draft Bylaw, there is a high likelihood that freedom campers will not adhere to the restricted conditions of freedom camping and therefore the area cannot be protected by the Draft Bylaw. As a result, the purpose of the Bylaw will be unable to be upheld, resulting in drastic adverse effects on the natural environment. Such adverse effects include; pollution of waterways, contaminating soils, dumping of rubbish, unsanctioned discharge of human waste, damage to natural habitats and fire risk. These environmental issues are already significant and will only be exacerbated if freedom camping is permitted on most rural roads.  | The submitter requests (in the interest of achieving the draft Bylaw's purpose of protecting the area) that freedom camping on most rural roads is prohibited as per point 1.4 above and that enforcement mechanisms are strengthened to protect the environment. |
| 7. | Negative Social and Economic Effects | <p>Freedom camping has become a contentious issue in rural areas across the District as tourism has increased. The Draft Bylaw has potential to further exacerbate negative impacts for local communities. Such communities may experience increased conflict as permitted freedom camping will potentially generate antisocial behaviour such as noise, alcohol consumption, disrespecting private property and loss of amenity. An increase in these adverse effects may reduce the enjoyment of rural areas by locals and other visitors. Furthermore, rural roads are typically isolated and unlit, posing safety risks to both local residents and freedom campers.</p> <p>The current economic climate means that traditional farming operations have had to diversify their business interests to remain economically sustainable, diversification includes providing commercial accommodation services. Permitting freedom camping in rural areas may undermine local businesses that rely on visitor fees to operate.</p> | The submitter requests that freedom camping on most rural roads is prohibited as per point 1.4 above and that enforcement mechanisms are strengthened to minimise adverse social and economic effects.  |

## Submission on QLDC Draft Freedom Camping Bylaw 2025

**Topic:** Selection of Rural Roads to be Restricted Freedom Camping Areas

**Submitter Name:** Medius Wanaka Ltd

**Contact:** Nicole Malpass, IP Solutions Ltd

[REDACTED]

[REDACTED]

**Date:** 7<sup>th</sup> August 2025

### 1.0 Overview

The submitter considers the bylaw as currently drafted to be fundamentally flawed and overly broad by its inclusion of many rural roads designated for restricted freedom camping, which cannot comply with said restrictions/criterion for compliance.

This submission focuses specifically on what roads the proposed bylaw seeks to identify as 'Restricted Freedom Camping Areas'.

The Submitter does support QLDC's goal of managing the impacts of freedom camping through legislating a robust bylaw framework and agrees that restrictive conditions applying to freedom camping on rural roads are appropriate in principle. Conditions will play a vital role in protecting the environment, health and safety of people, and the amenity associated with public use of roading networks.

However, this submission strongly urges QLDC to adopt a site-specific, evidence-based approach when identifying rural roads for Restricted Use. Roads that do not meet the criteria should be excluded from the final mapping.

Halliday Road, for example, cannot meet the proposed restrictions. A one-size-fits-all road classification ignores site-specific constraints, making it hard for campers to identify compliant locations on roads they presume are suitable. This will complicate

enforcement and lead to illegal camping and conflicts among landowners, road users, and campers.

## 2.0 Support for the Intent and Conditions

The conditions outlined in Clause 8.3, such as maintaining a 5m buffer from the carriageway, using [REDACTED] pull-offs, limiting stay duration, and prohibiting fire and waste, are justified to reflect sound risk management. It is prudent to restrict freedom camping in rural roadside areas where the combination of narrow shoulders, poor visibility, or environmental sensitivity poses a hazard.

These restrictions, as well as the identification of prohibited areas whereby high-speed roading environments exacerbate safety risks, are all supported.

## 3.0 Key Concerns

### 3.1 Broad Inclusionary Approach

Despite supporting the intent and conditions in principle as they relate to roads within the District, the somewhat blanket identification and mapping of rural roads where by Restrictive Use is proposed to apply, fails to account for the ability for those specific roads to comply (or not comply) with the criterion proposed. Nor the need for further nuances, as recognised by the technical assessment undertaken by Tonkin & Taylor.

*"TT advise that a site-specific assessment would be required to confirm the presence of such hard constraints and whether or not they are located in areas that could reasonably be used for freedom camping".*

Despite this recognition, the draft bylaw and supporting documentation does not offer site-specific evidence to justify why each of these areas/roads have been deemed appropriate for restricted freedom camping. Instead, the bylaw identifies a vast number of rural roads in the district for restricted freedom camping, regardless of site-specific assessment that determines their appropriateness for such use. This approach is not evidence-based and does not comply with the intent of section 11(2) of the Freedom Camping Act 2011, which requires targeted regulation based on actual need.

### 3.2 Restrictive Conditions and Site-Specific Assessment of Halliday Road

In order to somewhat partially address this lack of site-specific assessment, this submission puts forward an assessment of one location; Halliday Road. See figure 1 below which depicts subject area and surrounds.



**Figure 1:** Aerial image of Halliday Road with Proposed Freedom Camping Bylaw 2025 overlay. Yellow indicating restricted road freedom camping area. Source: QLDC GIS.



As noted within the Tonkin & Taylor reporting;

*“Where the speed limit of a road is 70 km/h, the transport SMEs determined a high potential adverse impact on the health and safety of freedom campers and the public. Therefore, a hard constraint is applied to these areas, and freedom camping is not recommended on or immediately beside any high-speed road, in order to protect health and safety.”*

Clause 8.3 of the draft [REDACTED] is the following conditions the areas identified for rural road freedom camping [REDACTED]

- (a) use a certified self-contained motor vehicle;
- (b) ensure that the side of part of the motor vehicle closest to the road (that is the carriageway) is located a minimum of 5m from the nearest edge of the road hard shoulder (where provided) or edge of seal (where no hard shoulder) at all times;
- (c) ensure that the motor vehicle is positioned in a location to ensure any other person can stop their motor vehicle in the immediate area at all times for any other purpose (i.e. other than for freedom camping);
- (d) ensure that the motor vehicle is only positioned on a formed gravel or sealed surface;
- (e) ensure any camping equipment and any other personal items are fully contained within 2m of the motor vehicle at all times, on a side of the vehicle away from the carriageway;
- (f) not stay more than 2 nights within any 30 day period, and not return to any location within 500m of a location where the person has previously freedom camped;
- (g) not leave any waste;
- (h) not light any fires outside of the motor vehicle.

As noted, whilst these restrictions are understood and supported in principle as they will apply to the District, it is not possible for campers to find a compliant location along Halliday Road thereby making Halliday Road unsuitable for restricted freedom camping. Specifically, discounting vehicle crossings, there are no locations whereby a motor vehicle could park on a formed gravel or sealed surface which would be a minimum of 5m from the nearest edge of the road hard shoulder or edge of seal.

Of further concern, the Tonkin and Taylor assessment has clearly recommended that freedom camping should not be occurring along high-speed roading environments. In the instance of Halliday Road, the speed environment is 100km/h and therefore being subject to this hard constraint as defined, should be specifically identified as prohibited.

The inclusion and identification of such a road, subject to a hard constraint, whereby legal compliance becomes unreasonably difficult/impossible, is confusing and makes responsible camping unnecessarily challenging and confusing (campers will see roads on mapping/freedom camping information, only to suffer the confusion of 'where' such compliance can occur). This shortfall will facilitate an increased risk of illegal, unsafe, or unmanaged camping.

### 3.3 Contradiction Responsible Camping Strategy and Tourism Values

QLDC's own *Responsible Camping Strategy 2022–2027* supports a mix of regulatory and non-regulatory measures to manage camping, emphasising education, infrastructure, and local partnerships. Blanket restrictions across rural roads without site-specific assessment and informed designation are problematic for the following reasons:

- Contradicts the spirit of the strategy;
- Restricts and confuses travellers as to what areas are and are not designated for safe and responsible camping (the map shows one location, but on site assessment/search for compliance, certain roads classified will not offer compliance);
- Last minute failure to find compliance may push campers to less safe or ecologically sensitive sites not currently used;
- Risk increasing illegal or unmanaged camping.

## 4.0 Recommendations:

1. Restrictive conditions upon rural roads in relation to freedom camping are generally well supported;
2. Undertake site-specific assessment upon designated rural roads, amending locations where appropriate, to ensure compliance is achievable and to avoid confusion. This may involve targeted, site-specific assessments of commonly used or potentially viable rural laybys and pull-offs to:
  - a. Determine which areas meet the bylaw's conditions,
  - b. Identify areas that cannot practically meet those conditions,
  - c. Inform improved signage and education for visitors.

3. Remove Halliday Road (and any other road which does not provide an opportunity for compliant freedom camping) from being a rural road identified for restricted freedom camping given there is no ability to comply with the conditions recommended.
4. Specifically, Halliday Road has a speed limit of 100km/h, and being subject to this hard constraint, should be identified as a prohibited area for freedom camping.

## 5.0 Conclusions

Whilst responsible freedom camping and the need for effective regulation is supported, the inclusion of rural roads in Schedule 1B is too broad-brush, unsupported by site-specific consideration and evidence. Many rural road locations, while technically falling under Schedule 1B, cannot meet the bylaw's requirements, and blanket regulation without verification risks unintended consequences.

Council are urged to undertake greater site specific assessments upon rural roads to ensure the well-considered conditions are achievable in order to adopt a more targeted, evidence-driven, and overall successful approach pursuant to s11 of Freedom Camping Act (FCA) 2011. This process enables and demands thorough assessment, and an accurate identification of what roads can and cannot provide for safe and effective freedom camping.

Kind regards,

IP Solutions Ltd on behalf of Medius Wanaka Ltd

**Freedom Camping Bylaw August 2025 copy of full submission but cut shorter.**

**I am only commenting on locations I am familiar with. However general comments probably apply over the whole district.**

**Strangely I made a similar submission back in April 2016! And again in 2020.**

Recently, I attended a conference where Freedom Camping was commented on. Ironically the comments were made by a person who, when in government, promoted the Freedom Camping Act before the Rugby World Cup games 2011. This same person, is now a Mayor, commented that this has gone too far and is not fair on Holiday Parks, Residents and Councils, who spend large sums of money to provide serviced camping locations.

Freedom Camping is now the tourism version of **Dirty Dairying -Dirty Camping**.

Freedom Camping and Free camping / parking, are 2 different things with both 24 hours a day usage. Using a public car park is not camping neither does it present a suitable place to camp.

Observations over summer of 24/25 and prior years, the biggest proportion of freedom campers were in places such as the Events Centre, – Frankton- Town -Sunshine Bay and everywhere in between. A large % + where small vans, with a “hidden” toilet. Many with no water supply to the unit and little storage for dirty water..

Maybe a 5 liter water container but not 1 for potable water and one for grey water as one would expect. Many users openly said they ‘would not ever use the toilet in the van’. None the less, they seemed to have a Self-contained sticker. 2024-2025 summer confirmed locals concerns regarding Health and Safety. Creeks and lake edges nearby will often be used as a bathroom.

Many of these campers , were in fact employees in shops, restaurants, cafes and commercial offices etc.:-

Freedom Campers don’t generally camp to time limits . Experience of last summer showed that seldom up before 9-10am. If not at all some days. Often spend all day around the spot parked. Often not within range of any Public toilets.

Do not allow overnight camping/parking in close proximity with the CBD, Primary schools and our spawning Creeks and wetlands?

#### Boundary St Car Park

Putting overnight parking spaces here is like moving spaces from Park Street to outside of the Council Chambers, even more in the heart of the CBD.

Any events on the Recreation Ground and day parking can see rows of people using. Horne Creek and its banks being used as a toilet. This is in full daylight let alone at night. Feces in doorway of Library not unheard of.

Horne Creek is a key spawning body for Lake Wakatipu which then flows through the Village Green to its outlet right beside the children's playground. In summer especially one can see small ones playing across the creek. What more might flow down overnight? How to control if smaller vans fill the carpark over and above of allocated sites Boundary Street later at night?

Unintended consequences of using Boundary Street parks:

If aim is to use the current day time longer parking motor home spots as above they are more likely to be standard car size vehicles. The probability may be to dash over to start paying just before 8am then back to bed.

These longer length parking slots are well used for real campervan, motorhome vehicles who arrive into town too early to check into holiday park or leave at check out time but want more time around the shops before leaving town. If occupied by small car vans they will then be trying to fit into smaller slots

Question ?

Are we looking for a night camping or overnight parking? There is a big difference.

Suggestion:

Look to the parking across from the Memorial Centre. There are some 24 parking spots. This could be used for every slot overnight, or every 2<sup>nd</sup> slot, with a size limitation. e.g. 5.5 mts.

If size not workable then allow parallel parking over night – dotted lines -that would allow for Motorhomes and larger campervans. Rubbish bins already in place. Public toilets within quick walk. Potable water in toilet cubicles..

However, within close proximity to registered holiday parks.

2024-2025 summer showed us that the vast numbers of free campers that are an issue – ie Park St, were small van / station wagon type units. These campers also showed us that access to the front or back of their vehicle was not as important as the side. Parking nose to tail on many locations.

#### Lakeview Carpark Queenstown

Public toilets nearby? Potable water? Rubbish bins?

This carparking was established along the fencing in front of council leased out holiday park .On development a low cross bar at the entrance was installed to ensure that no

campervans or motorhomes could park overnight there and impact the Holiday Park guests (Council leasehold) not what the lessees expected by their landlord. Even now the small car campers can use that area. If to be for Freedom camping I guess the barrier will need to be removed to allow for motor homes, camper vans big and small.

#### Events Centre Frankton

This last summer overnight camping was forbidden and now it's suggested to put 9 spots on the first carpark areas from the highway. No public toilets. No potable water. Sports fields for community activities. How will this be managed to keep the numbers to just those spots.

Gorge Road Location map not very clear of actual location but assuming by the wetlands.

2 marked slots – if in use by a non camper do they have to move or can the van park in another space? If by the wetland and such restricted times then maybe more sites? No public toilets nearby No potable water available . Park Street results? Again beside a vulnerable wet lands and within close walking ability to trespass to use a Holiday Park's facilities.

#### Industrial Place Carpark - For and against.

No facilities anywhere nearby. However, if truly self contained maybe should allow for more spaces? Park Street results ? No public toilets nearby No potable water available.

However, again in close walking reach of a Holiday Parks facilities.

#### Qtown Events Centre Frankton **section.**

Why 8pm? No public toilets nearby? Potable water? Park Street result?

Not part of the Event Centre parking rules?

Areas by the old bridge across the Shotover River on the town side and down by the river before the underpass still available for overnight camping?

Suggestion.

Areas along Glenorchy Road has areas where people park on during the day could allow for an overnight option?

#### Lake Hayes north end.

Return possibility of camping at the north end of Lake Hayes. On the side away from the lake edge. It already has toilets etc.

As a rate payer I am concerned about the costs of policing these proposed locations. Especially limiting the numbers per night per month. Will there be regular checks



across the permitted times and how often a night? The cost of cross checking if returnees or not.

**We are beyond Ambassador's chit chatting and moving on stage.**

The safety of anyone checking and finding many more vehicles parked than slots allocated. These checking should probably have 2 persons per location.

These costs should not fall on the ratepayer. It would be good to understand the payment rate as against tickets issued last summer.

I understand that residents have spoken with some of these campers about how much the fine will be. The answer was a shake of head and pointing to earlier tickets on the floor of the van. "don't care"

Where approved on public car parks with day time payment options, one could arrive earlier and pay to park in any vacant spot and then just move over or stay put at approved time?

I notice that Kelvin is not acknowledge as a location of any Resident.

At any location will the camping slots be standard parking slots and usable by general public vehicles during day and non paying during night times, camping of not? e.g. Night time events at Events Centre or the Memorial Centre?

Residents coming into town for an evening meal?

I would like to be heard, however I am out of town week 25<sup>th</sup> August arriving back Thursday 25<sup>th</sup>.

Erna Spijkerbosch

Long Term Resident. [REDACTED]

## **Submission on the Draft 2025 Freedom Camping Bylaw**

**Subject:** Opposition to Freedom Camping on Rural Roads, Specifically Rutherford Road and the Adjacent Lake Hayes Car Park

To: Queenstown Lakes District Councillors

From: Steve Sanderson and Christina Shaw

Date: 8 August 2025

### **Introduction**

We write to express our strong concerns regarding the inclusion of numerous rural roads—particularly Rutherford Road and the small gravel car park adjacent to Lake Hayes—in the Queenstown Lakes District Council’s draft 2025 Freedom Camping Bylaw

The proposal to permit freedom camping on these roads and associated parking areas, subject to certain conditions, raises serious questions about its rationale, practicality, and alignment with health and safety priorities. This submission focuses specifically on Rutherford Road and the Lake Hayes car park.

### **Concerns Regarding Rutherford Road**

#### **1. Road Composition and Usage**

Rutherford Road is surfaced with Otta seal—a low-cost bitumen treatment typically used for roads with minimal traffic. The road serves 23 residential properties along a 600-metre stretch and terminates at Lake Hayes, where a small gravel car park provides access to the lake for recreational use.

#### **2. Road Width and Safety**

The road is approximately 1.25 car widths wide. Vehicles frequently use grass verges to pass, often requiring one vehicle to stop entirely. This narrow configuration is unsuitable for campervans and poses safety risks.

#### **3. Recreational and Event Use**

Rutherford Road is regularly used by cyclists and pedestrians accessing local trails. It is also closed for major events such as the Queenstown Marathon, further underscoring its recreational importance and limited capacity.

#### **4. Lack of Health and Safety Assessment**

Despite the emphasis on health and safety including Council webinar on this proposed by-law, it is concerning that no on-site assessment was conducted prior to including Rutherford Road and the Lake Hayes car park in the proposed bylaw. This omission undermines the credibility of the proposal.

## 5. Non-Compliance with Bylaw Conditions

The proposed bylaw stipulates that freedom camping must occur at least 5 metres from the curb and on a hard surface. Rutherford Road does not meet these criteria, raising the question: why was it included? Its inclusion may mislead freedom campers into believing overnight parking is permitted, which is inappropriate and potentially hazardous.

## Concerns Regarding the Lake Hayes Car Park

### 1. Limited Infrastructure and Usage Conflicts

The gravel car park at the end of Rutherford Road is small, unmarked, and primarily used by recreational visitors e.g. walkers, bikers, and swimmers—often well into the summer evening. It intersects with a popular trail and lacks formal traffic management, making it unsuitable for overnight campervan use.

2. Health and Safety Risks: No health and safety assessment has been completed, nor have mitigation measures been proposed.

The area is heavily used by the public during day and summer evenings, and campervan presence would create congestion and diminish the amenity.

Turning space is limited, particularly during peak seasons.

### 3. Environmental Impact

Significant restoration efforts are underway at Lake Hayes to improve the health of the lake and surrounding wetlands. Allowing freedom camping in this sensitive area risks undermining these efforts.

### 4. Historical Non-Compliance and Lack of Facilities.

Despite self-containment requirements, past freedom camping at Lake Hayes has seen repeated non-compliance, including dishwashing, bathing, and teeth brushing in the lake.

There are no toilet facilities at the site. It is unrealistic to expect full compliance, and the likelihood of environmental degradation is high.

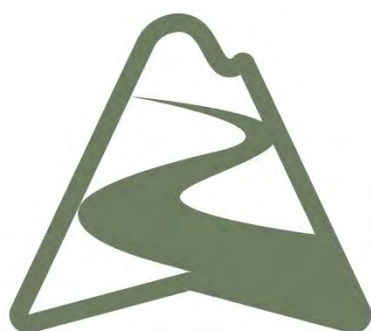
## Conclusion

We respectfully urge the Council to reconsider the inclusion of Rutherford Road and the Lake Hayes car park in the draft 2025 Freedom Camping Bylaw. These areas are unsuitable for freedom camping due to their physical limitations, recreational significance, lack of infrastructure, and environmental sensitivity.

We appreciate the opportunity to provide feedback and trust that the Council will prioritise health, safety, and environmental stewardship in its final decision.

Regards,

Steve & Christina



# UPPER CLUTHA Tracks Trust.

## Upper Clutha Tracks Trust

### Submission on Queenstown Lakes District Council's draft Freedom Camping Bylaw 2025

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The Upper Clutha Tracks Trust ("the Trust") is grateful for the opportunity to submit on Queenstown Lakes District Council's draft Freedom Camping Bylaw 2025.

We make our comments in respect of the Bylaw's impact on walking and cycling access, key aspects of the Trust's mandate.

## Introduction

Upper Clutha Tracks Trust (UCTT) accepts the need for the bylaw and is generally in favour of what is proposed. However, the UCTT has some concerns in respect of two restricted freedom camping areas.

## Areas of concern

### 1 - Camphill Rd carpark

The draft bylaw proposes designating this carpark as a restricted freedom camping area with a maximum number of certified self-contained motor vehicles not exceeding 15.

### 2 - Allenby Place carpark

The draft bylaw proposes designating this carpark as a restricted freedom camping area where 5 marked motor vehicle spaces will be available to certified self-contained motor vehicles.

## Background

The Camphill Rd carpark was built to provide car parking for users of the Hawea River track. It has, since then, morphed into also providing parking for water enthusiasts using nearby features on the river, particularly "the wave".

During the warmer months, the Camphill Rd carpark is close to capacity with some vehicles parked on the verges of Camphill Rd.

As with other tracks, early morning and evening use is common. It is also not unusual to see river enthusiasts still at play at 9pm on a summer evening.

The UCTT is finalising plans to form a new "true right" track along the Hawea River between Camphill Rd and Lake Hawea. This is likely to add to the demand for parking at Camphill Rd.

The UCTT's concern is that approving freedom camping at Camphill Rd will restrict the ability of the public to easily find a parking space, forcing the overflow onto the roadside. This, potentially, adds to the existing safety issue of cyclists, walkers and water users crossing the narrow Camphill Rd bridge.

The UCTT notes the bylaw (Part 1 62A) contains the Freedom Camping Act 2011's two definitions of freedom campers - those on visitor visas who face restrictions and New Zealand citizens who are unrestricted.

This suggests the potential for some of the 15 Camphill Rd freedom camping carpark to be used for semi-permanent habitation in vehicles or tents (such as occurs at the Albert Town end of the Hawea River track) reducing the number of vacant freedom camping parks available each night.

-

### **Suggested Solutions**

The UCTT's preference is that freedom campers use one of the three existing designated camping areas within a few kilometres of the Camphill Rd carpark rather than the Camphill Rd carpark.

However, if the council decides to proceed, the UCTT requests:

- if feasible, a 15-park extension to the existing car park
- a physical barrier between the freedom camping parks and the existing public park
- nightly monitoring and enforcement of the bylaw over summer.
- time of use (arrival and departure) and length of stay and return period be defined similar to those proposed for other sites in the Upper Clutha

The UCTT considers Allenby Park unsuitable for freedom camping due to the combined effects of the small size, close proximity to houses and displacement of local users to access Mt Iron. The UCTT urges the QLDC to carefully consider how the carpark is configured and the degree of monitoring and enforcement provided.

There is the potential for displacement of local users at the start and end of the day, particularly with the impending increase in users of Mt Iron. Overflow parking will likely extend to Allenby Park playground and the street. Is this acceptable to the QLDC?



Below is a photo taken at 9am on 23<sup>rd</sup> July showing the car park full with early morning walkers and runners vehicles.



The Allenby Place carpark is also a bit of an anomaly compared to the other proposed locations as it is off the main tourist route in the middle of an urban environment, and is unlikely to be found by freedom campers. By including it in the bylaw, council is effectively bringing it to people's attention,

UCTT chairman David Howard, on behalf of UCTT trustees.

Signed *David Howard*

date: 5/8/25

**David Howard**  
**Chair**  
**Upper Clutha Tracks Trust**



## QLDC Freedom Camping Bylaw

**Submission: R & L Watson 668 Kane Road**

8 August 2025

Queenstown Lakes District Council

### Submitter Details

|                            |                        |
|----------------------------|------------------------|
| Name of Submitter:         | Richard and Liz Watson |
| Address:                   | [REDACTED] South Hawea |
| Wishes to be Heard         | Yes                    |
| Email contact for Service: | [REDACTED]             |

### Introduction

Richard and Liz Watson own and reside at [REDACTED] South Hawea on a 215ha sheep farm, located on the eastern side of Kane Road.

The property is a working farm which includes restrictions on visitors dogs to control the spread of hydatids.

Rabbit control shooting is undertaken frequently at night time as measures to control rabbit populations.

Their property is accessed via a private right of way which serves two properties, being their property (access to farmhouse and sheep yards and sheds), and an 8ha lifestyle block located to the south east of the driveway at [REDACTED]

The access is effectively a driveway used by two properties, is gravel, and contains a relatively steep hairpin corner to negotiate a terrace riser.

### Submission

#### 1 - Identification of a private Driveway as a Freedom Camping Road

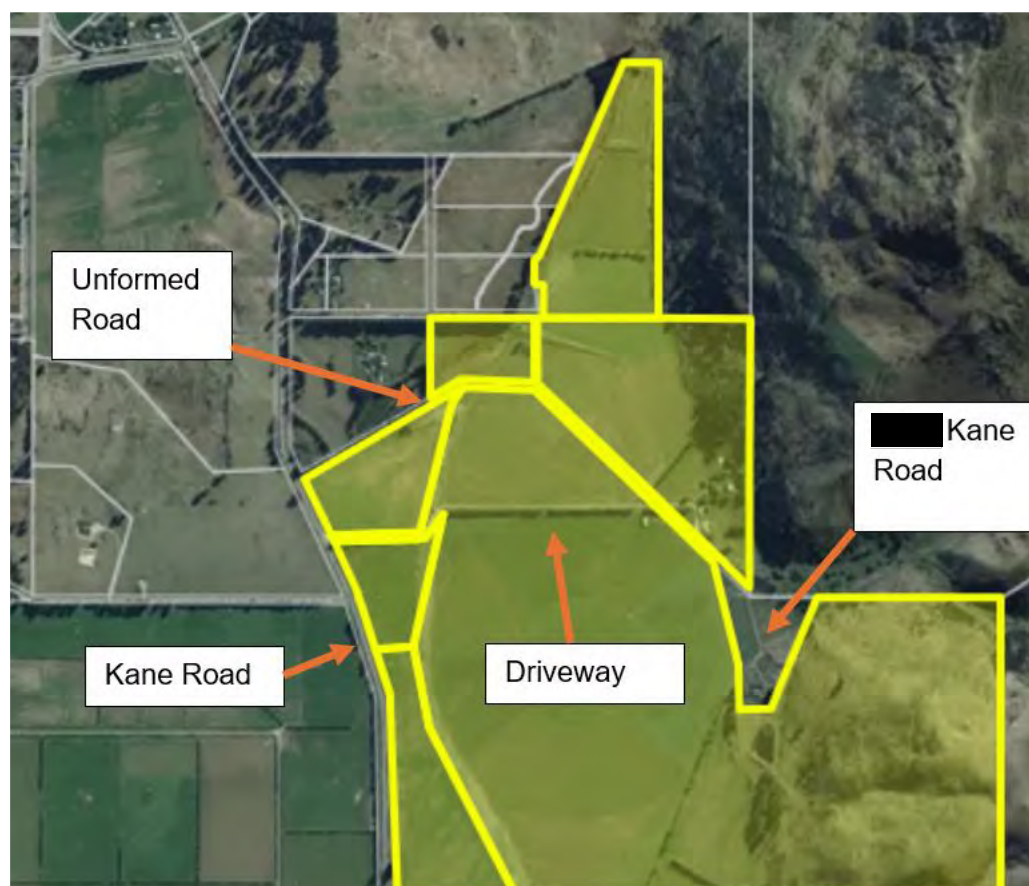
The Watson's driveway is identified on the Bylaw mapping system as a road, with Freedom Camping permitted, subject to restrictions.

This is not correct, the land is not road, but private land held in a record of title subject to a right of way which favours [REDACTED].

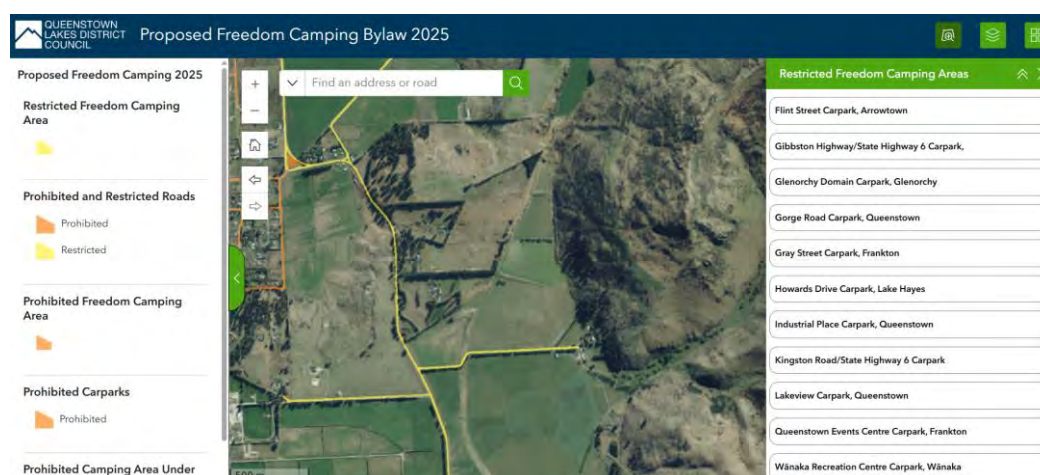
An unformed road referred to as Lagoon Valley Road, is located approximately 250 metres to the north. This road is not formed in any way and provides no practicable access.

Figures 2 to 4 show the location of the driveway in relation to the road.

Therefore, it is considered unlawful for the Council to identify this driveway as a road for permitted freedom camping.



**Figure 1.** Area in yellow is the Watson Farm, with the unformed road, neighbour at [REDACTED] Kane Road and driveway annotated (source: Grip Survey App)



**Figure 2.** Excerpt of the Freedom Camping interactive Map. Illustrating the Watsons driveway and ROW for [REDACTED] Kane Road as a freedom camping 'restricted road'.





**Figure 3.** Plan showing the existing road and allotment configuration. The white areas are road. The yellow shading are easements, and the Watson's driveway and ROW benefitting Kane Road.



**Figure 4.** Similar image to Figure 3 with aerial photograph shown.

## 2 – Freedom Camping on Kane Road

There is a dedicated freedom camping area at Red Bridge. Therefore, there is ample camping in proximity to Kane Road and no need to encourage freedom camping on Kane Road. The road verge of Kane Road along the property boundary is unkept and has long grass and rough terrain following the placement of fill by the Council associated with road works in other locations.

There is a concern associated with fire risk and in some locations, vehicles becoming stuck, especially if arriving in the dark, as promoted by the restricted parking standards. This area is not suitable for freedom camping and there is no need for camping.

### 3 - Relief Sought

1. That the driveway (as shown in Figures 1-4 above) is removed from all freedom camping maps (and as a road on any QLDC maps in general).
2. That freedom camping is not permitted in any form along Kane Road.

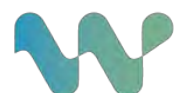
Yours Sincerely



Craig Barr

Planning Consultant

MNZPI



# **Halliday Road Wanaka**

## **Submission on Draft Freedom Camping Bylaw 2025**

### **Introduction**

We, the undersigned residents, landowners, and concerned parties of Halliday Road and surrounding areas in Wānaka, are submitting this collective request for the Council to prohibit freedom camping along Halliday Road. This rural road is not an appropriate or sustainable location for freedom camping, and we have observed a number of negative impacts which affect health and safety, the environment, community wellbeing, agricultural operations, and local investments.

We refer to the QLDC Statement of Proposal, page 7, that “.... prohibits freedom camping in areas where there are high adverse impacts from freedom camping that cannot be managed by conditions (such that freedom camping in these areas would not protect the area, access and/or health and safety).”

We are particularly concerned about the well reported health and safety incidents at the intersection of Halliday Road with State Highway 6 and Morris Road and we believe this hazard is so significant that freedom camping in Halliday Road should be prohibited.

There is impact on access and safety for recreational walkers and cyclists to the Upper Clutha track currently provided via Halliday Road. Some limited parking at the turning circle is available for recreational users but this is not suitable for freedom camping sized vehicles and is not designed for overnight freedom camping.

It must be remembered that this area was established because a Halliday Road landowner generously made access available to the track via private land beyond the turning circle. This contribution by a previous landowner has resulted in a significant benefit for the wider community, and the popularity of the track has fulfilled the landowner’s vision for casual recreation along the Upper Clutha track.

The items of concern mentioned above are covered in more detail below, together with other concerns that have been noted by landowners during preparation of this submission.

We note that the draft freedom camping bylaw has been developed to define freedom camping on rural roads generally throughout the QLDC area. We strongly believe this “one size suits all approach” is not appropriate for Halliday Road and potentially other rural roads in the district. In the case of Halliday Road we believe the simplest approach is to prohibit freedom camping and trust our submission enables QLDC to do this.



## **Traffic Safety at the Halliday Road Intersection**

The intersection where Halliday Road meets the main highway is already a difficult and dangerous exit point, particularly during peak traffic hours. There have been serious vehicle accidents, including crashes requiring helicopter assistance. Locals working adjacent to the intersection report sightings and /or hearing near misses on a reasonably frequent basis. Any increase in traffic volumes—especially from freedom campers unfamiliar with the area—raises the risk of further incidents at this already hazardous junction. The hazard is due primarily to the short line of vision to vehicles approaching at 100 kilometres per hour on State Highway 6 from the direction of Luggate. Vehicles approaching from the direction of Wānaka can also be hazardous, particularly when vehicles stop in the run-off lane into Halliday Road, which hides approaching traffic from vehicles exiting Halliday Road. These factors combined with vehicles exiting or entering Morris Road means extreme care is required.

We envisage the majority of freedom campers will be tourists unfamiliar with the area. Camper vans are generally large vehicles which are relatively slow moving from a standing start, which increases the hazard. SH6 is often busy at the time the proposed freedom camping vehicles will be leaving in the morning. This intersection has a worse level of danger than the Hawea/ Albertown intersection had previous to the new roundabout. It requires either a signalised intersection or a roundabout to be safe. We believe freedom camping in Halliday Road should be prohibited on traffic safety grounds alone.

We refer below to relevant media articles regarding traffic incidents:

### **23 December, 2023**

“Six people have been injured in a serious two vehicle crash near the Lavender Farm at the junction of Morris Road on SH6 near Wānaka. The accident happened around 2.00 pm this afternoon. The road was blocked but re-opened at 3.20 pm, with reports of six injuries and three people taken to hospital. One person is seriously injured and was airlifted to Dunedin hospital. Two others had moderate injuries. Three other people were treated at the scene for minor injuries. Police confirmed to Crux that a rescue helicopter was involved in the emergency response.”

**In 2017, the intersection at the turnoff to Lavender Farm was the scene of another serious collision between a car and a bus.**

In that case, the car was travelling away from Wānaka and turned right from the highway on to Morris Rd in front of the bus. Two people in the car were seriously injured in that accident and airlifted to hospital.

## Walker and Cyclist Safety

Halliday Road is a popular route for walkers and cyclists, with a designated recreational track which starts at the turning circle.

**Sign at the Halliday Road turning circle.**



As noted in the introduction, some limited parking is available for recreational users at the turning circle but this is not suitable for freedom camping sized vehicles and is not designed for overnight freedom camping.



## Halliday Road Turning Circle



This area is also used for the mailboxes and rubbish collection of six residents sited in the non-vehicular end of Halliday Road. Residents maintain this space to keep it

accessible for the rubbish trucks, mail van, and people walking and cycling the trail. This has not been managed by the Council. The middle of the roundabout surface is extremely uneven with large ruts and most unsuitable for freedom camper vehicles. The presence of freedom campers would narrow the road creating safety hazards, and discouraging recreational use of this valued public space.

### **Maintenance of Berms**

Currently grassed berms in Halliday Road are maintained by landowners in a neat and tidy condition. While it is acknowledged that these berms are predominantly on QLDC land, they would potentially be damaged by freedom camper vehicles detracting from the appearance of the area. They can be costly to reinstate.

### **Human Waste and Rubbish**

Freedom campers frequently leave behind human waste and litter, either buried, discarded in nature, or placed in residents' private rubbish bins during the night. This is a serious health risk, unpleasant, and not in keeping with the care we take to maintain our rural environment.

### **Farm Machinery and Livestock Movement**

Halliday Road is an active farming route used by heavy machinery and for the movement of livestock. The livestock cross the road where the roundabout is to access the paddocks on the lower side of the farm by the river. Parked campervans would obstruct access and create hazardous conditions for both farmers and animals. This is unsafe and disrupts critical agricultural operations.

### **Increased Fire Risk in Hot Summer Conditions**

Halliday Road and its surrounding paddocks and vegetation are highly susceptible to fire during the very hot, dry Central Otago summers. Freedom camping along this road increases the risk of accidental ignition from vehicle activity, cooking equipment, discarded cigarette butts, or other camper behaviours. In a rural area without immediate firefighting infrastructure, such a fire would pose a serious danger to life, property, and farmland. Adding freedom camping to this environment only heightens that risk unnecessarily.

### **Safety of Residents**

Some residents in Halliday Road have expressed feeling intimidated due to the increase in overnight visitors and transient vehicles near their homes, especially during nighttime hours. Their privacy would be invaded.

## **Rates and Existing Camping Provision**

Residents on Halliday Road pay substantial rates, and we are already accommodating of freedom campers through designated sites elsewhere in Wānaka. It is unfair to open a peaceful and pristine rural road to unmanaged and unmonitored freedom camping, especially when many campers do not contribute economically to the area.

## **Undermining Local Accommodation Investment**

Several locals have invested heavily in commercial accommodation options nearby. Freedom campers parked along Halliday Road detract from the quality, appearance, and atmosphere of the area, potentially devaluing nearby investments and businesses aimed at paying guests.

## **Lack of Meaningful Self-Containment Compliance**

Despite some vehicles displaying self-contained stickers, we have witnessed clearly non-compliant vehicles, and have found piles of human waste and toilet paper left behind. The self-containment system is not adequately enforced, and the rural character of Halliday Road should not bear the consequences.

## **Visibility and Access Obstruction from Parked Vehicles**

Halliday Road now has numerous driveways and residential entrances. Parked vehicles, especially large camper vans, significantly reduce visibility for vehicles entering and exiting driveways and side roads. The only open section of the road is near the turning circle, which must remain clear for mailboxes and rubbish collection bins. This area cannot safely accommodate parked camper vans and should be explicitly kept free of obstruction.

Given the number of designated freedom camping locations already available in the Wānaka area, it is not necessary to permit camping on residential rural roads such as Halliday Road. We believe strongly that such use degrades the area, puts residents at risk, and detracts from the natural and social environment.

We urge the Council to implement a ban on freedom camping along Halliday Road and ensure clear signage and monitoring to enforce it. Thank you for the opportunity to make this group submission. We trust that our collective voices and shared experiences will be taken into account.

Sincerely,

Christine Pawson and Dennis Hunt on behalf of Halliday Road residents, landowners and concerned parties as listed below:

## **HALLIDAY ROAD RESIDENTS WHO HAVE SIGNED AND AGREED WITH THIS SUBMISSION**

Malcolm & Annalie Hancox

[REDACTED]

Email: [REDACTED]

Indira & Michael Neuendorff

[REDACTED]

Emails: [REDACTED]

Athol Budge

[REDACTED]

Email: [REDACTED]

Danielle Budge

[REDACTED]

Email: [REDACTED]

Michael & Kathryn Bressell

[REDACTED]

Email: [REDACTED]

Wanaka Haven

Duncan & Rebecca Frazer

[REDACTED]

Email: [REDACTED]

Maple Lodge

Arthur Smith

[REDACTED]

Email: [REDACTED]

Donald Austin

[REDACTED]

Email: [REDACTED]

Kelly Austin

[REDACTED]

Email: [REDACTED]



Jennifer Alternate

[REDACTED]  
Email: [REDACTED]

Grant McGregor

[REDACTED]  
Email: [REDACTED]

Mike Kaye

[REDACTED]  
Email: [REDACTED]

Stuart Pinfold

[REDACTED]  
Email: [REDACTED]

Karen Ryan

[REDACTED]  
Email: [REDACTED]

Chan Chui Ling Karen and  
Chan Yim Kuen

[REDACTED]  
Email: [REDACTED]

Uschi & Guy Mannering

[REDACTED]  
Email: [REDACTED]

Sharon Wilson

[REDACTED]  
Email: [REDACTED]

Brendon Wilson

[REDACTED]  
Email: [REDACTED]

Josh Wilson

[REDACTED]  
Email: [REDACTED]

Samuel Wilson

[REDACTED]  
Email: [REDACTED]

Oliver Wilson

[REDACTED]  
Email: [REDACTED]

Jasmin Cole

[REDACTED]  
Email: [REDACTED]

Christine Pawson

[REDACTED]  
Email: [REDACTED]

Dennis Hunt

[REDACTED]  
Email: [REDACTED]

Janet Hunt

[REDACTED]  
Email: [REDACTED]

Andrea & Calum Macleod

[REDACTED]  
Email: [REDACTED]

Hayley Lee

[REDACTED]  
[REDACTED]

Graham Lee

[REDACTED]  
[REDACTED]

Note: Other concerned parties include family members of residents who are regular visitors to Halliday Road.



8 August 2025

Queenstown Lakes District Council

Via email: [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**RE: QLDC Draft Freedom Camping Bylaw 2025**

Tenā koe,

As the representative voice of the hospitality and accommodation sector, Hospitality New Zealand (Hospitality NZ) takes immense pride in advocating for the interests of over 2,500 diverse businesses, including cafés, restaurants, bars, clubs, nightclubs, commercial accommodation, country hotels, and off-licences. With a history spanning over 120 years, we have been steadfast in our commitment to fostering a thriving and responsible sector.

We are writing to you on the Draft Freedom Camping Bylaw 2025.

Freedom camping has long been a part of New Zealand's tourism experience. However, in recent years, the growth in non-self-contained freedom camping, particularly in non-compliant locations, has negatively impacted the environment, local communities' perception of visitors, and the experience of other travellers.

Hospitality NZ acknowledges and supports the Council's recognition that improvements must be made in how freedom camping is managed and monitored.

We welcome the proposed introduction of prohibited areas, the exclusion of reserves, and the intent to restrict freedom camping to designated areas, subject to conditions such as time limits, designated parking, maximum number of nights, proper waste management, and certification of self-containment. However, we wish to emphasise that the success of any bylaw is only as effective as its enforcement.

The bylaw drafted is highly complex, particularly for visiting freedom campers. Detailed schedules, spacing rules, and time restrictions, while well intentioned, could lead to confusion, non-compliance or inadvertent violations. For clarity, we recommend the need for introducing simplified maps and signage at key access points, and ensure digital tools, like an app or online map, clearly show camping zones and conditions.

We also raise concern about the proposed use of the Boundary Street carpark, which is located near an existing holiday park and two backpacker hostels. Allowing freedom camping in this area creates direct competition with these businesses, effectively asking rate paying accommodation providers to subsidise their own competitors. Holiday parks and backpackers are among the businesses most impacted by freedom camping. Where freedom campers and

travellers would have traditionally stayed, these businesses now face financial losses and additional operational burdens.

We encourage Council to take a balanced approach that protects public access while also supporting local businesses that contribute significantly to the local economy and infrastructure. Consideration should be given to relocating proposed freedom camping areas away from existing accommodation providers, or at the very least, introducing more mechanisms to mitigate competitive disadvantage, similar to limiting stays or prioritising areas further from commercial operations.

Please do not hesitate to contact us if you have any further questions.

Ngā mihi nui,

A handwritten signature in black ink, appearing to read 'B. Elliott'.

Brendan Elliott  
Regional Manager, Lower South Island  
**Hospitality New Zealand**

7 August 2025

Tēnā koe QLDC,

## **VIEWS ON THE QLDC DRAFT FREEDOM CAMPING BYLAW 2025**

Thank you for the opportunity to provide feedback. As the Central Otago District office of the Department of Conservation (DOC), we are responsible for managing public conservation land, tracks, and associated infrastructure in the surrounding area. While we support the intent of the Draft Freedom Camping Bylaw 2025, we have identified several critical issues where the proposed bylaw may result in unintended consequences for public conservation land, visitor experience, and DOC infrastructure. Please note that this feedback considers the area administered by the DOC Central Otago office.

### **Amenity Pressure on Public Conservation Land**

Tonkin & Taylor's Technical Assessment sections 2.3.2 and 4.8 - acknowledges that the presence of facilities can attract freedom campers, despite self-containment requirements. This has direct implications for DOC-managed toilets and infrastructure. Although the bylaw assumes that freedom campers are self-contained, the practical reality is that visitors will often choose to use public toilets when available. This places unplanned and unmanaged pressure on DOC facilities that are not designed to accommodate overnight and increased use, leading to more frequent pumping and cleaning coming as a direct cost increase to DOC.

This is particularly evident at sites such as Kidds Bush (Meads Road), Diamond Lake/Rocky Mountain trailhead, and Raspberry Flat, where visitor numbers are already high and amenity capacity is limited. We have concerns around facility pressures arising from the proposed restricted camping at the Camp Hill Road Carpark, Hāwea for the same reasons. Zoning nearby roads as restricted freedom camping areas is likely to increase the load on these facilities.

We recommend that QLDC take this behavioural reality into account when determining restricted camping areas. While the Tonkin & Taylor Technical Assessment explicitly notes that the presence of facilities such as toilets significantly increases the likelihood of camping and localised overuse, the proposed bylaw appears to direct freedom campers towards DOC-managed sites where these very impacts are most likely to occur. This contradiction risks undermining the assessment's findings and places avoidable pressure on amenity infrastructure not designed for overnight and such increased use.

We recommend QLDC avoid designating restricted camping zones in close proximity to DOC toilets and amenity sites, especially those which do not currently permit freedom camping.

### **Cassette Dumping and Waste Infrastructure**

Kidds Bush has experienced repeated complaints of cassette toilet waste being dumped into public toilets, which are not designed for this use. This raises hygiene concerns and increases servicing

costs. The Draft Statement of Proposal references the importance of managing environmental and amenity impacts, but does not address the availability or location of dump stations.

We recommend QLDC publish a district-wide map of waste disposal facilities and align restricted zones with access to these locations.

### **Dangerous and Inappropriate Zoning**

We have significant concerns about the proposal to include roadside restricted zones in two specific areas:

- Opposite the currently closed Boundary Creek Campsite: This area appears to align with the Boundary Creek Track. It cuts through Hawea Conservation Park and has a history of serious incidents involving vehicles attempting to access the area (2016 fatal crash). Promoting this track for freedom camping access presents an unacceptable safety risk.
- Cameron Flat Road: This route involves a braided river crossing that is impassable without a heavy-duty 4WD vehicle. Including this area in the bylaw encourages inappropriate vehicle access and poses safety risks.

We recommend both locations be removed from the bylaw proposal.

### **Displacement into Day-Use Carparks**

Many of the proposed restricted roads lead directly into DOC-managed carparks that are intended for short-stay, day-use only. While the bylaw imposes time-based restrictions on parking, we are concerned that freedom campers may remain parked during the day, blending in with legal day users and thereby avoiding enforcement.

Clarity is needed on how QLDC plans to distinguish between vehicles that have camped overnight in breach of the bylaw and those legitimately using the carparks during permitted hours. Without this, the proposed road restrictions may unintentionally displace overnight stays into these sites, compounding existing pressures. Further it creates a rule that would be difficult to monitor, and hence enforce.

Further clarity is also required around how QLDC will manage situations where freedom campers exploit the overlap between restricted overnight camping hours and permitted daytime parking, particularly in carparks adjacent to restricted roads. Without active management, this risks undermining the intent of the restrictions and impacting other visitors experiencing while placing further pressure on DOC managed sites.

### **Map Presentation and Clarity on DOC Prohibited Areas**

The Draft Statement of Proposal notes that DOC-administered sites were excluded from mapping because they are covered under separate legislation. While this distinction is legally valid, the absence of DOC-prohibited areas on the zoning maps may create confusion for the public.

We recommend that QLDC amend the zoning maps to clearly show DOC-prohibited and restricted camping zones using a separate legend category. This will help reinforce legal compliance and improve coordination between agencies. We would be happy to provide support for this to be undertaken. Alternatively, a clear disclaimer should be added directing users to the DOC website for official camping information.

### **Site-Specific Considerations**

- Meads Road: We do not support freedom camping along this road due to its role as the sole access route to Kidds Bush. The campground is under pressure and has no dump station nearby.



- Diamond Lake/Rocky Mountain and Raspberry Flat: These are high-use sites already experiencing capacity issues and are particularly vulnerable to increased freedom camping in adjacent roadside areas.
- Mt Iron Carpark: While this car park is currently designated as a conservation area, this site is expected to be vested to QLDC in the near future. We encourage its consideration for inclusion in future bylaw amendments.

**We recommend that QLDC:**

- Refrain from zoning restricted camping areas near DOC-managed toilets or day-use infrastructure.
- Remove Boundary Creek Track and Cameron Flat Road from the proposed bylaw due to safety risks.
- Include a map of district-wide dump station locations and align zoning with their availability.
- Visually differentiate DOC-prohibited areas on maps or include a disclaimer directing users to official DOC information.
- Clarify enforcement processes for distinguishing overnight campers from legal day-users in public carparks.

We welcome the opportunity to meet with QLDC to discuss these matters in greater detail before final decisions are made.

Yours sincerely,



**Charlie Sklenar**

*Pou Matarautaki*, Operations Manager Central Otago

8 August 2025

Queenstown Lakes District Council

By email: letstalk@qldc.govt.nz

## Freedom Camping Bylaw 2025 Consultation

1. We refer to the consultation on the draft Freedom Camping Bylaw 2025 that is currently underway. We note that one of the areas that is proposed to be designated as "restricted freedom camping" includes part of Mount Nicholas-Beach Bay Road, to the wharf at Walter Peak.
2. While we agree that restrictions on freedom camping are appropriate in the area, in our view, the part of the road from the Mick O'Day Track to the Department of Conservation marginal strip immediately in front of the Walter Peak wharf should be designated "prohibited".
3. This is primarily for health and safety reasons, as detailed below.

### a. Suitability of the road for freedom camping

Mount Nicholas-Beach Bay Road is approximately 20 metres wide in the relevant area. The proposed "restricted" designation requires that campers ensure that the part of the motor vehicle that is closest to the road is at least 5 metres from the nearest edge of the road hard shoulder or edge of seal. The road is a gravel road and it does not have suitable formed gravel or sealed surfaces on the roadside and therefore there are no reasonable areas for campers to pull over on the roadside to camp safely in compliance with the Part 2 restrictions.

In addition, at the end of the road near the wharf there are no fences between the road and Realnz's property and Realnz considers that there would be a high risk that campers would encroach on Realnz's property due to the nature of the road being unformed.

**b. Safety of other users of the road**

Realnz operates tourism experiences on both sides of the road at the end of Mount Nicholas-Beach Bay Road (see Appendix 1). As noted above, the road is not formed at the end, and there are no physical barriers to guests crossing the road. Accordingly, there are hundreds of guests crossing the road every day. During summer hours, this may be up until 11pm at night. This bears greater similarity to a small urban residential area than a rural road.

Realnz carefully manages its deliveries and other traffic visiting its sites to manage this risk, however it is concerned that permitting people to freedom camp in this area will create a high adverse safety impact to its guests, given the nature of the road and the number of pedestrians who use it.

**c. Hazard zone**

Parts of the proposed “restricted” road area are in a hazard zone (refer Appendix 2), which may increase the risk to campers staying there overnight. Realnz gives careful consideration to the hazard zoning when making decisions about its properties that are on either side of the road and we would recommend that the zoning is also taken into account when considering whether freedom camping should be prohibited in this area.

4. In addition to the safety concerns, monitoring and enforcement of the restrictions on freedom camping will be difficult at Walter Peak, given that the site is not easily accessible at short notice by QLDC’s staff. This may lead to higher levels of non-compliance. It would be simpler to communicate and to manage if freedom camping was prohibited.

For the reasons outlined above, we believe that freedom camping on Mount Nicholas-Beach Bay Road from Mick O’Day Track to the end of the road at the marginal strip adjoining the wharf creates safety concerns and it should be prohibited.

Thank you for your consideration of the matters raised in this submission.

Kind regards,

A handwritten signature in black ink, appearing to be 'Erin Vercoe', with a long horizontal stroke extending to the right.

Erin Vercoe  
General Counsel  
Realnz

## APPENDIX 1 – REALNZ OPERATIONS AT WALTER PEAK



Source: QLDC Map Navigator

<https://experience.arcgis.com/experience/8Oc97d34e5764669bb9aab99e4Od5b8d/page/Map-Navigator?views=Property>

## APPENDIX 2 – HAZARD ZONE AT RELEVANT AREA



Source: QLDC Map Navigator

[experience.arcgis.com/experience/8Oc97d34e5764669bb9aab99e40d5b8d/page/Map-Navigator?views=Hazards](https://experience.arcgis.com/experience/8Oc97d34e5764669bb9aab99e40d5b8d/page/Map-Navigator?views=Hazards)



8 August 2025

## Submission on QLDC Draft Freedom Camping Bylaw 2025.

To: ☒ [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

Submitter Details:

This Submission is from: Realnz Limited,

[REDACTED]  
Te Anau 9600.

I can be contacted at: C/o Fiona Black

[REDACTED]

☒ [REDACTED]

### A. Introduction

- 1) Realnz Limited / Real Journeys Limited welcomes the opportunity to submit QLDC Draft Freedom Camping Bylaw 2025.

### B. Background information regarding the submitter

- 2) In 1954 Les and Olive Hutchins began operating the Manapouri-Doubtful Sound Tourist Company, running four-day excursions to and from Doubtful Sound Patea travelling across Lake Manapouri Moturau. That is Real Journeys has been operating in the Manapouri-Doubtful Sound Patea area for 70 years. In 1966 Les and Olive acquired Fiordland Travel Ltd with its Te Ana-au Glow-worm Caves and Milford Track Lake Transport operation and began trading as Fiordland Travel Limited. Continued expansion followed with the acquisition of the vintage steamship "TSS Earnslaw" in Queenstown in 1969 and with the establishment of cruises in Milford Sound in 1970.
- 3) In 2002 Fiordland Travel Ltd began operated all its tourism excursions under the 'Real Journeys' brand; in 2004 Stewart Island Experiences (including Stewart Island Ferries) was established and in 2006 changed its company name to Real Journeys Limited. In 2013 Real Journeys purchased 629-hectare Cardrona Alpine Resort and the 155-hectare property at Walter Peak which Real Journeys previously leased. Then in 2016 Real Journeys took over 100% ownership of Queenstown Rafting.
- 4) In October 2018, the Wayfare Group was established and each company created or acquired by Real Journeys Limited became wholly owned subsidiaries of the Wayfare Group. In 2018 Wayfare Group acquired the rights to develop the 980-hectare Soho Basin. The following year Cardrona Alpine Resort Limited purchased the assets of the 770-hectare Treble Cone Ski Field, located on public conservation land. This year, Cardrona Alpine Resort opened the Soho Basin adding a 150 hectares of skiable terrain to the adjacent Cardrona Alpine Resort making it the largest commercial ski area in Aotearoa.
- 5) In 2021 Wayfare became Realnz and while Cardrona Alpine Resort, and Treble Cone maintain their individual brands as Realnz experiences, all the tourism brands come under the umbrella of Realnz. Realnz remains in private ownership and is the largest tourism operator in the region with operational bases in Milford Sound Piopiotahi, Te Anau, Manapouri, Queenstown, Wanaka, and Stewart Island Rakiura.

- 6) Specifically, outside the ski fields, the company offers a range of quality tourism excursions including: multiday Discovery Expeditions around the southern fiords and Rakiura; day time and overnight cruises on Milford Sound Piopiotahi and Doubtful Sound Patea (with daily coach connections from Te Anau and Queenstown); Te Anau Glow-worm Caves excursions; Stewart Island ferries, tours on Rakiura; in Queenstown, cruises on Lake Whakatipu aboard the “TSS Earnslaw” combined with Walter Peak High Country Farm excursions and dining options at the Colonel’s Homestead.

**C. Our submission**

- 7) Realnz opposes the proposed Freedom camping along the Mount Nicolas-Beach Bay Road, within the margins of Real Journeys property at Walter Peak – refer figure 1. We are opposed to allowing Freedom camping along this section of the road because part of this area is effectively a residential area where Real Journeys staff live – refer figure 2.
- 8) Also, the area is commercial, or business area, with Walter Peak Farm Excursions commencing at 0940 hours and dining activities at Walter Peak Colonel’s Homestead usually occurring until 2140 hours and for special events the Colonel’s Homestead can be in use until around midnight. During special events there can be a band playing which would not be compatible with Freedom Camping.
- 9) During these times from 0940 until 2140 hours Real Journeys can have between 250 to 500 guests on site at Walter Peak at any one time; therefore, it would be inappropriate to have freedom campers on site.

*Figure 1 - the area in which Realnz is opposed to freedom camping - red line*



- 10) Realnz is not opposed to vehicles (campervans or similar) parking overnight in Real Journeys carpark (yellow rectangle in figure 2) and walking to the Department of Conservation Beach Point camp site to camp overnight. Refer figure 1 with respect to the location of this camping site.

*Figure 2 - red rectangles are the locations of Real Journeys staff accommodation at Walter Peak (yellow square)*



- 11) Vis-à-vis Realnz's proposed time restrictions for use of Real Journeys carpark, we suggest campers are on site by 1700 hours and gone by 0930 hours the following day to avoid the influx of Realnz guests for the first Walter Peak Farm Excursion and Horse Trek of the day.

#### **D. Conclusion**

- 12) Realnz appreciates the opportunity to submit on QLDC Draft Freedom Camping Bylaw 2025 and trusts the Council will be cognisant of Realnz's concerns regarding allowing freedom camping along the Mount Nicolas-Beach Bay Road, adjacent to Real Journeys property.

August 8<sup>th</sup>.

██████████, RD2, Wanaka

TO: Queenstown Lakes District Council

The residents of ██████████ Cardrona Valley Rd strongly oppose the proposed Draft Freedom Camping Bylaw 2025, particularly the provision to allow restricted freedom camping on rural roads, including gravel roads that pass directly beside our private property.

While we appreciate QLDC's current situation where the Supreme Court have directed council to form a new freedom camping policy, we strongly suggest that council take a pragmatic and longer-term view around freedom camping. The proposed policy to use mainly rural roads for camping is flawed for the following reasons:

**Visual Pollution:**

The proposed roads to be used for restricted camping are on some of the upper Clutha's most iconic landscapes and road corridors – e.g. Cardrona Valley Road, Lake Hawea areas. Freedom camping not only affects locals using these roads daily but also degrades the overall visitor experience of which there are many thousands.

**Pollution:**

While the majority of freedom campers are responsible, there are still many who are not which is evidenced daily around numerous hotspots in the district. General rubbish and sanitation issues are ongoing.

**Monitoring:**

As evidenced with the last Freedom Camping by-law, it was difficult to enforce even with regular monitoring in a built-up area such as the Wanaka Lake waterfront. Therefore, if the last freedom camping by-law was difficult to enforce, we see no reason why this would be easier, especially in more remote rural locations.

The difficulties of allowing Freedom Camping on remote rural roads, at nighttime especially, will make it almost unenforceable. The risk becomes, and as frustration grows, that landowners and neighbours end up taking responsibility for transgressions, often with unforeseen and negative outcomes.

**Particular Interest:**

My husband and I own the property at ██████████ Cardrona Valley Road. The property boundary is on the northern side of Touhys Gully Road and runs the full length of the road, from the bridge up to near the entrance to the Meg Hut/ DOC carpark. Camping is prohibited in that area.

Touhys Gully Rd is a narrow gravel road with limited verge on either side of it. We cannot see any areas where the freedom camping would adhere to the proposed regulations, including formed areas.

There are also wide sight lines from the road verge into our, and our neighbours, properties. One of these properties has our boutique accommodation business of 18 years sited there. Guests would need to move around parked vans to access our property. This would essentially result in an absurd situation where we have people freedom camping outside our gates and driveway, while paying guests are trying to navigate around them to access paid

accommodation.

The risk also arises, were freedom camping to be allowed on the verges, that after any spots were taken, campers would be inclined to keep driving a little further on and camp in the Meg Hut Carpark which is on private land and where camping is prohibited. Who is going to monitor this?

**Safety:**

Our property sits within the working area of Cardrona Valley Farms where frequent stock and heavy farm machinery movements take place, often daily. There are two working wool sheds and holding yards - one behind our property boundary and one directly in front of our boundary.

The Southern Proving Ground and the Cardrona Horse Trekking business have cars, horses and quad bikes working around the lower part of our boundary.

The Touhys Gully Stream runs from the Meg Carpark through our property into the Cardrona River risking health issues.

**Recommendations:**

That QLDC take a longer-term view around freedom camping and set up 6 to 8 designated spaces with basic facilities around the district, alike like the Red Bridge designated area at Luggate which is set down to double in size. This model is used in other countries where there is high visitation in rural areas, such as France and Italy.

While understanding the pressures on council around affordability, setting up such designated areas could be funded by debt with approximately 1 percent increase in rates over 10 years. While ratepayers do currently carry a heavy burden in the current economic environment, and no-one wants a further increase in rates, this might ultimately have less impact when compared to other unpalatable options which will have ongoing negative issues with them.

We request QLDC review the proposed policy taking into account all the factors above. In addition, we request that Touhys Gully Rd be removed as a restricted freedom camping area to a prohibited camping area.

Yours sincerely,

Ann Lockhart and Blyth Adams





New Zealand Motor Caravan Association Inc.

***YOUR JOURNEY  
STARTS HERE***

# Queenstown Lakes District Council Draft Freedom Camping Bylaw 2025

## Submission from the NZMCA

08 August 2025

[nzmea.org.nz](http://nzmea.org.nz)

PO Box 72147 Papakura 2244





|                          |   |
|--------------------------|---|
| <b>SUBMISSION TO</b>     | Queenstown Lakes District Council   |
| <b>REGARDING</b>         | Draft Freedom Camping Bylaw 2025  |
| <b>DATE</b>              | 8 August 2025   |
| <b>SENT TO</b>           | <a href="mailto:letstalk@qldc.govt.nz">letstalk@qldc.govt.nz</a>  |
| <b>SUBMISSION AUTHOR</b> | James Imlach<br>National Manager – Property & Policy  |
| <b>SUBMITTER ADDRESS</b> | New Zealand Motor Caravan Association<br>Inc. PO Box 72147<br>Papakura 2244<br><a href="http://www.nzmca.org.nz">www.nzmca.org.nz</a> |
| <b>EMAIL</b>             | [REDACTED]  |
| <b>PHONE</b>             | [REDACTED]  |
| <b>WISH TO SPEAK</b>     | Yes   |

## Summary

- 1 The New Zealand Motor Caravan Association Inc. (NZMCA) is a non-profit organisation, local ratepayer, and campground owner/operator. We welcome the opportunity to submit on the Queenstown Lakes District Council's Draft Freedom Camping Bylaw 2025 (the draft bylaw).
- 2 **We generally oppose the bylaw** to the extent that it:
  - a. applies blanket bans to large geographical areas of the district and restricts freedom camping to only a relatively small handful of designated sites. This prohibitive approach is inconsistent with the permissive intent and default position of the Freedom Camping Act 2011 (the FCA);
  - b. applies overly restrictive conditions to areas set aside for freedom camping that are not justified under s 11 of the FCA; and
  - c. fails to genuinely consider reserves and other local authority areas within urban settings that are appropriate for camping in self-contained vehicles.
- 3 We submit that the extent of restrictions and prohibitions applied across the district is neither justified nor proportionate to the actual impacts of freedom camping. These measures overlook the diverse demand for freedom camping opportunities from responsible campers that QLDC purportedly welcomes.
- 4 The Council's website states that tourism is the district's largest industry, however the draft bylaw unnecessarily imposes prohibitive restrictions on responsible campers who contribute to the local economy. The draft bylaw is at odds with the Council's strategic direction outlined in its [Travel to a Thriving Future – A Regenerative Tourism Plan \(2022\)](#) and [Responsible Camping Strategy \(2024\)](#). These documents express a clear commitment to making evidence-based decisions, while welcoming responsible campers and promoting inclusive tourism. To uphold these values, QLDC must adopt a more proportionate approach and enabling mindset that supports responsible camping as part of its critical visitor economy.
- 5 **We recommend** making these amendments to better align the draft bylaw with the FCA's legislative intent. We understand the Council may need to re-consult the public.
  - a. Delete clause 5 and assess reserves properly among the local authority areas where freedom camping will occur.
  - b. Amend sub-clause 7.2.
  - c. Delete sub-clause 8.3(b) and 8.3(d).
  - d. Amend Part 3.
  - e. Remove sub-clause 10.8.
  - f. Amend the arrival and departure times listed under Schedule 1A.
  - g. Reconsider local authority areas that should have been made available for responsible camping had the Council not taken account of irrelevant matters when adopting the 2021 bylaw.

## Freedom camping – a traditional pastime

- 6 Freedom camping is not merely an activity for young overseas tourists travelling on a shoestring budget. In 2011, Parliament recognised freedom camping as a long-standing and valued tradition enjoyed by tens of thousands of New Zealand families. NZMCA members deeply value the opportunity to explore the country and freedom camp in a variety of locations, including within urban, residential, rural, and remote areas. A survey earlier this year of 1,000 NZMCA members found that 19% prefer freedom camping over all other forms of camping accommodation, and 52% consider it an essential part of their overall journey.

- 7 The draft bylaw does not reflect the pro-camping premise of the FCA. When introducing the Freedom Camping Bill (the Bill) in 2011, the then Minister of Conservation, Hon Kate Wilkinson, stated:

*“Freedom camping is a valued tradition in New Zealand, as we have heard, and this Government wants to ensure that it stays that way....The presumption is that people can camp unless a location is specifically restricted....This bill is purposely pro-camping, as we recognise that the majority of freedom campers are responsible and take great care to clean up after themselves.”*

- 8 Supporting this view, former MP for Christchurch Central, Nicky Wagner, noted during the second reading of the Bill:

*“The [Act] for the first time, enshrines the right of New Zealanders to go freedom camping as a default setting. New Zealanders can camp as of right on public land and Department of Conservation land, unless there is a good reason not to allow it...In creating these by-laws, [local] authorities need to prove that there is a real problem. This bill ensures that they can no longer impose blanket bans, and it will give consistency across the country...[Local] authorities can impose those by-laws within only very limited geographical areas.”*

- 9 Hon Louise Upston, MP for Taupō, also spoke to the social and economic importance of freedom camping for everyday New Zealanders:

*“...the main point I want to make is that [the Act] is about protecting the right of New Zealand families to camp, I want to give a personal example. I was raised camping by the lakes, by the rivers, and by the beaches. I remember times with my son when staying in a camping ground was not affordable at the time. So, we would pack up the borrowed tent, jump in the car, and drive to a place that was yet undiscovered.”*

*“This bill protects the right of New Zealanders to have those kinds of adventures in this country because it will stop the blanket [ban] by-laws.”*

- 10 Parliament introduced the FCA for two purposes: to protect New Zealanders’ rights to freedom camp (by enshrining a permissive and proportionate approach), and to encourage

responsible freedom camping practices (by enhancing the range of tools and enforcement measures authorities could utilise to address problems arising from freedom camping). The NZMCA wishes to collaborate with local authorities to ensure both of these objectives are achieved. The draft bylaw does not do so. The NZMCA has worked constructively with the Department of Conservation, many local authorities, and other government agencies on pragmatic and lawful policy settings, increasing facilities for campers, and on better national regulatory measures to encourage compliance and self-contained camping.

- 11 The draft bylaw goes against Parliament's intent and expectations by prohibiting freedom camping across large geographical areas of the district, including many locations that the evidence demonstrates are suitable for responsible camping. The extent of restrictions on freedom camping in the draft bylaw similarly is contrary to what the FCA intends. When combined with other regulatory tools, the bylaw will effectively prohibit freedom camping in most of the district's desirable areas. It does not protect the ability of everyday New Zealanders and their families to freedom camp responsibly in the areas they value. The draft bylaw, if adopted as proposed, seriously risks undermining the very rights Parliament sought to preserve through the establishment of the FCA.
- 12 The Council has frequently expressed concern over the costs of allowing for responsible camping and has previously advocated for legislative change to make freedom camping a prohibited activity by default. Yet, in recent years, QLDC has also received millions of dollars in taxpayer funding to build more tourism infrastructure, develop responsible camping strategies, and monitor and enforce its previous freedom camping bylaws. In 2023/24 alone, QLDC received \$495,000 in taxpayer funding, including specific support for developing the draft bylaw. Despite this substantial financial backing, the Council has failed to deliver a regulatory framework that reflects the permissive intent of the FCA. Instead of enabling reasonable access by default, the draft bylaw imposes unnecessary and disproportionate restrictions and prohibitions. To date, we have seen no robust analysis from the Council demonstrating that freedom camping actually presents a net financial burden to the community, nor any reasonable, adequate or compelling evidence that would justify the extensive prohibitive approach and undue use of restrictions as a response towards the vast majority of campers who are responsible with their behaviour and waste management.

## About the NZMCA

- 13 The NZMCA was founded in Gisborne in 1956. Nearly 70 years on, it has grown into one of New Zealand's leading voices in tourism, representing over 120,000 financial members, including more than 800 residents of the Queenstown Lakes District, who travel the country in self-contained motorhomes and caravans. Our members are typically hybrid campers enjoying commercial campgrounds, private campsites, and freedom camping areas. Many members who reside in the district also want to be able to freedom camp in their own backyard.
- 14 The NZMCA is a ratepayer and operates an NZMCA Park in Glenorchy exclusively for its members travelling in self-contained vehicles. We manage 63 similar parks across New

Zealand, with additional sites in development. Since 2009, the Association has made repeated efforts to work collaboratively with QLDC to establish an NZMCA Park locally. These proposals were intended to help meet demand for more affordable camping options and to support responsible tourism. However, each proposal involving council or conservation land has been declined or opposed by QLDC, which has consistently prioritised the economic interests of its commercial campground network – an asset in which it holds a pecuniary interest – over expanding access to freedom/low-cost camping in desirable locations for New Zealanders.

- 15 As the leading advocate for responsible camping in the tourism sector, the NZMCA actively supports initiatives that raise standards and improve infrastructure. We have worked closely with local and central government to promote responsible camping under the Self-contained Motor Vehicles Legislation Act 2023. In addition, we regularly contribute funding to support community-led projects and tourism infrastructure. For example, we provided **\$10,000 to the Hauraki District Council** to help develop a public freedom camping area near Kaiaua that complements the Hauraki Rail Trail, and **\$5,000 to Grey District Council** to upgrade the Cobden Bridge freedom camping site in Greymouth, including surfacing improvements and support for a community shelter and barbecue (see attached). These contributions reflect our commitment to responsible camping while delivering tangible benefits to local communities.

## Excluding reserve land

- 16 We disagree with QLDC's decision to exclude genuine consideration of reserve land in deciding how to manage freedom camping in the district. For reasons that remain unclear to us, Councillors instructed officers at two bylaw workshops in April and May 2025 to exclude reserve land from the bylaw-making process on a flawed understanding of how camping occurs on reserves and the proper relationship between the Reserves Act 1977 and the FCA. Councillors formed the view that, for FCA purposes, freedom camping on reserves is prohibited. This is plainly incorrect once the purpose and objects of both statutes are understood as working together to promote freedom camping in local authority areas. Consequently, QLDC directed Tonkin & Taylor to apply a 'hard constraint' to all reserve land, automatically excluding them from consideration in the requisite site assessments. This position is formalised in Clause 5 of the draft bylaw, which states the bylaw does not apply to reserve land and that decisions to enable freedom camping will be made under the Reserves Act only. While the Council has indicated it may, through a Reserves Act process, consider allowing freedom camping on a small number of reserves in the future, this assurance is difficult to accept given its history of reversing prior commitments made by full Council.
- 17 In the context of freedom camping in the Queenstown Lakes District, we submit that Councillors were wrong to instruct officers to exclude reserve land from the required site assessments and overall regulatory response under the FCA to freedom camping in the district, including through the bylaw-making process. This approach has prevented the identification and proper consideration of reserve land suitable for responsible camping across the district that could help meet demand.

18 This approach to reserves also creates a fragmented regulatory framework. When freedom camping is managed under two separate statutes like this it risks confusing campers and enforcement officers, compromising compliance and affecting a positive visitor experience.

19 Since 2011, QLDC has maintained that the FCA is the appropriate mechanism to regulate freedom camping across the district. For example, at its meeting on 26 July 2018 regarding amendments to the Arrowtown-Lake Hayes Reserve Management Plan, Council stated:

*“...the Council will be able to regulate freedom camping through a freedom camping bylaw under the Freedom Camping Act 2011. Council considers it desirable to regulate freedom camping through its freedom camping bylaw, given the advantageous enforcement mechanisms under the Freedom Camping Act 2011 (notably infringement notices). This approach would also enable greater consistency in regulating freedom camping across local authority areas in the district.”*

20 At the May 2025 bylaw workshop, Council officers identified at least 12 reserves that could readily be made available for self-contained freedom camping. However, all were excluded from consideration following Councillors’ instruction to omit reserve land from the site assessment process. QLDC has attempted to justify this decision by citing consistency with s 44 of the Reserves Act. This rationale is flawed and misunderstands how the Reserves Act operates in conjunction with the FCA. QLDC has previously exercised its delegated authority to permit freedom camping at Luggate Red Bridge, and several reserves are available to accommodate responsible camping subject to the bylaw or Council’s delegated authority. The Council clearly has the legal means to enable camping on some reserves, including through reference to the standards proposed in this bylaw process, yet for reasons not disclosed to submitters it has closed its mind to that and chosen to exclude reserve land entirely from the assessment process. In doing so, QLDC has denied itself and submitters the opportunity to consider reserve areas as part of a balanced and evidence-based response on how to effectively manage freedom camping, including through a bylaw made under the FCA.

21 Council officers have also advised that reserves cannot be added to the draft bylaw without a second round of public consultation. We acknowledge a second round of consultation may be required after QLDC corrects the error of excluding reserves from genuine consideration in decisions on how to manage freedom camping in the district. We also note that if reserves cannot be added as permitted or restricted areas under the current consultation, then the reverse must also apply: the Council cannot prohibit additional areas following submissions, without further public consultation.

## **Blanket ban applied to urban roads**

22 We disagree with the Council’s decision to prohibit responsible camping on urban roads. The site assessments claim this broad-brush approach is necessary to protect public health, safety, and access. Yet, these impacts are not present at all urban roads throughout the district and the same vehicles used for responsible camping are permitted to park overnight in these



areas, provided no one sleeps in them. This highlights a flawed assumption: that self-contained camping is inherently unsuitable in urban environments and must be confined to remote areas out of sight, out of mind. However, there are many valid reasons why New Zealanders want and need to be able to freedom camp in urban areas, particularly on roads within residential neighbourhoods, which is provided for in many other districts. For example,

*“Freedom camping in townships and urban areas is very convenient for us. We can do our laundry, stock up on groceries, and eat out. We will make a conscious effort to freedom camp in smaller towns and support local businesses as they support us being there. We will bypass a town that does not provide a safe and convenient place to park overnight”* **Brenda Graham & Ross McGregor (Christchurch)**

*“We are exploring New Zealand fulltime now and love freedom camping. We stay almost exclusively in towns or urban areas for two main reasons: (1) Jude has a disability and cannot walk unassisted. Being close to town means we can look around and shop at our own pace; and (2) we feel much safer staying in town, particularly as it takes a while for us to get in and out of our motorhome. We do not feel safe freedom camping in remote areas.”* **Jude Black & Paul Lawrence (Papamoa)**

*“We enjoy freedom camping in towns as it provides opportunities to park up our motorhome and go out for dinner or breakfast, or to go shopping. We love supporting local businesses, however if we are not welcome then those towns will simply miss out on our business.”* **Paula & Torsten Baker (Wellington)**

*“We purchased our motorhome three years ago. We’re still townies at heart and love camping in townships and urban areas when on the road or visiting friends. Close proximity (i.e. walking distance) to townships and shops is important for us as we like to spend a lot of time and money in cafes, restaurants, supermarkets, farmers markets, clothes shops, and at local events etc. We enjoy staying in a variety of locations, including freedom camping areas, low cost sites, NZMCA parks and campgrounds. We value the free and low-cost parking options that many towns provide and will always spend money as a show of appreciation.”* **Heather & John McMurdo (Blenheim)**

*“Owning a motorhome makes it easier for us to visit friends and family around the country. It is often more convenient for us to park outside their homes and sleep inside the motorhome overnight. Banning this will make it difficult for us to continue to visit our friends and family.”* **Neil Hellewell (Christchurch)**

*“We go out of our way to support local businesses and spend money in towns that welcome motorhomers. If the overnight parking areas are easy to get to and enable us to stay close by, we will eat out at local restaurants and explore the town.”* **Averil & Robin Williams (Southland)**

*“We love motorhoming in towns and have done so in several countries. The convenience of parking in town allows us to shop around and spend money. We find the better the facility the more the town benefits.” **Geoff & Jo Kidd (Christchurch)***

*“We love freedom camping as well as visiting public campgrounds, DOC campsites and NZMCA Parks during our travels. Freedom camping, particularly in rural and provincial towns, is a fantastic and easy way for us to learn more about a town’s past. We are more inclined to spend money in local shops and visit tourist attractions run by local residents when we are staying in town. As retirees, if we are forced to stay in campgrounds all the time, we will not be able to afford to travel as much as we do, while learning about New Zealand’s rich history and supporting a wider range of local businesses.” **Christine & Darryl Avery (Foxton Beach)***

- 23 These comments from our members help demonstrate there are many valid reasons why responsible campers, in particular NZMCA members, seek to stay in urban areas – such as close proximity to friends, family and essential services, access to healthcare, personal safety, and inclusion in community life. These needs are especially relevant for older travellers, those with mobility challenges, and people who rely on urban infrastructure during their journeys. We note the Responsible Camping Strategy explicitly recognises that meeting friends and family is a key reason for campers wanting to visit the district.
- 24 Council officers, seeking to further justify a blanket ban on urban roads, note that the majority of infringements issued under the FCA and RFS relate to people staying in urban areas. While this data is used to support prohibition, it also reflects a mismatch between camper demand and available legal options, not a failure of self-contained camping *per se*. Rather than prohibiting camping outright, the data supports the need for better-managed urban camping solutions, not exclusion. An approach similar to Waitaki District Council’s freedom camping bylaw, would more appropriately balance community concerns with camper needs, while still protecting public health, safety, and access. In Waitaki, freedom campers can park on urban roads with permission from the relevant homeowner. This is a practical, community-based solution that could also work well in the Queenstown Lakes District.
- 25 For these reasons, we question the reliability and rationale of the site assessments used to justify urban prohibitions. The assumption that urban camping is inherently problematic lacks nuance and fails to account for the diversity of camper behaviours and needs. The Council’s Responsible Camping Strategy explicitly states under the principle of Manaakitanga that

*We welcome visitors to our region with open arms. While the Council shares this responsibility with Kāi Tahu as Te Tiriti o Waitangi partners, everyone has a part to play. We value the visitors who camp in our region, as they enrich our lives and stimulate our economy. **We offer experiences that are inclusive and allow a diverse range of people to experience our region.** However, we also have tools that we can use to prevent bad behaviour such as education and infringements.*

[Our emphasis]

- 26 A more inclusive, proportionate, and evidence-based approach would allow for regulated urban camping, rather than promote a blanket ban that punishes responsible campers.

## Other comments – Statement of Proposal

- 27 These comments are based on the Statement of Proposal and officers' report dated 26 June 2025, included among the key documents supporting the draft bylaw.
- 28 We acknowledge that the district is a popular camping destination, which is precisely why we are concerned that the draft bylaw is disproportionate to the actual demand from responsible campers, most of whom are New Zealand residents contributing through taxes and rates that QLDC relies on to promote tourism. However, we do not accept the claim that the district is the most popular freedom camping destination in New Zealand, and therefore the Council's prohibitive approach is justifiable. The figure of 7,794 overnight campers in 2024 certainly does not justify a prohibitive framework. The Campermate app does not provide definitive data on actual freedom camping numbers, and other districts, such as Selwyn District Council, report significantly higher usage (e.g. over 30,000 visitor nights in 2024 across four freedom camping sites).
- 29 Officers suggest that the number of infringement notices issued and service requests reflect both popularity and adverse impacts. However, QLDC's strict enforcement regime, including issuing hundreds of invalid fines, skews this data. Furthermore, we expect many complaints are unrelated to the section 11 criteria and bylaw-making process and should not be relied on as evidence to justify blanket bans under the FCA.
- 30 In 2019, QLDC adopted an overly prohibitive and unlawful bylaw due to poor time management, as [reported by Stuff](#). Six years later, the 2025 draft bylaw appears similarly rushed. The officers' report notes:

*"As with any complex work programme undertaken at pace, there is the potential that if there were more time, there would be further opportunity to gather additional data and undertake more analysis to inform the draft bylaw."*

- 31 These admissions are concerning given the substantial taxpayer funding and external consultancy support QLDC has received to improve the management of freedom camping. Despite these resources, the draft bylaw again lacks balance, proportionality, and evidence. Blanket bans penalise the majority of campers who are responsible. They also ignore lessons from past judicial reviews and the potential for well-managed, inclusive alternatives.
- 32 The officers' report notes that QLDC will, in future, explore free and low-cost camping options on reserve land as part of a broader responsible camping programme. We remain sceptical, given the Council's history of not following through on similar past commitments. Moreover, senior staff have formally advised NZMCA that no land under Council's management and control is available for a low-cost campsite (NZMCA Park) – raising questions about how land might now be available for low-cost camping managed by QLDC or other organisations.

## Other comments – the Draft Bylaw

- 33 There is a potential legal and practical risk to responsible campers if the Council regulates roads using the definition under section 315 of the Local Government Act 1974 instead of the Land Transport Act 1998, which is more commonly used in FCA bylaws. The broader LGA definition will enable QLDC to classify more areas as “roads,” potentially extending freedom camping restrictions to places not traditionally considered roads or public areas by the general public or under transport law. This can lead to confusion for campers and inconsistent enforcement. This may conflict with the FCA’s requirement for proportionate and evidence-based regulation. Without clear signage on every road, responsible campers may unknowingly breach the bylaw, facing hefty fines or eviction in areas they believed were permissible.
- 34 Section 7.2 unlawfully reverses the default position established in section 10 of the FCA, which permits freedom camping in all local authority areas unless specifically prohibited or restricted through a bylaw, or any other enactment. The Department of Conservation and Internal Affairs made it clear during the legislative process that blanket bans are inconsistent with the FCA and the Bill of Rights Act 1990, and that councils must clearly define prohibited or restricted areas, not simply list permitted ones. The Kapiti Coast District Council’s 2010 bylaw was cited as an example of an unlawful blanket ban, similar to what QLDC is now proposing.
- 35 While QLDC acknowledges the FCA’s default position in the officers’ report, it gives it little to no weight effectively in the bylaw and dismisses it as inappropriate due to camper volumes, service requests, and site assessments. However, this rationale does not justify overriding the law and Parliament’s intent. If section 7.2 were amended to say *“no person may freedom camp in any local authority in Schedule 2 of this Bylaw that is marked prohibited”* other areas would remain available for consideration. Its inclusion, as drafted, is not only legally flawed but also disregards the foundational principles of the FCA. For QLDC to claim its situation is “unique” and therefore exempt from upholding these principles is deeply concerning.
- 36 Section 8.3 restricts freedom camping on rural roads requiring vehicles to be parked at least 5 metres from the roadside or shoulder and on a formed gravel or sealed surface. However, NZMCA members living in the district report they cannot find any suitable locations that meet these criteria. Officers have also confirmed they did not investigate rural roads during the bylaw-making process and are unable to identify any such freedom camping areas that meet the criteria. They also suggest QLDC is not required to provide these areas, only to ensure the restrictions on freedom camping are lawful. We strongly disagree with this rationale and sub-clause 8.3 as it creates the illusion of permissiveness while offering no practical freedom camping options. Moreover, the Council is still obligated to ensure restrictions are necessary, appropriate, and proportionate, and in this case, they clearly are not. To correct this problem, we recommend removing the aforementioned criteria.
- 37 Part 3 grants the QLDC’s CEO authority to temporarily prohibit, restrict, or amend conditions in any restricted area. However, it fails to define what “temporary” means or establish criteria for reopening affected areas. In contrast, other councils, such as the Manawatu District

Council (MDC), have adopted clear and lawful provisions for temporary restrictions. For example, when imposing temporary limits, the MDC has determined it must:

- a. Confirm any temporary decision is consistent with section 11 of the FCA, that it is the most appropriate and proportionate way of addressing the perceived problem in relation to that area, and that it is not inconsistent with the New Zealand Bill of Rights Act 1990;
- b. Define the area where the temporary prohibition or restriction applies, either by a map or a description of its locality; and
- c. Give appropriate notice to the public and key stakeholders, including a timeframe and criteria to be met for the temporary prohibition or restriction to be lifted.

- 38 The NZMCA does not oppose temporary limitations in principle. We understand they may be necessary sometimes, provided they comply with section 11 of the FCA and the Bylaws Act 1910. However, the failure of Part 3 to define “temporary” creates uncertainty. If the Council enforces prohibitions without a clear timeframe or criteria for lifting them, the CEO’s decision may be challenged as *ultra vires* because it is not genuinely temporary. Conditions on such measures should be built into the bylaw.
- 39 Section 10.8 allows QLDC to charge any fee when campers apply for discretionary consent to freedom camp in a prohibited area or outside the criteria of a restricted area, e.g. for event purposes. We have two key concerns with this provision. First, it grants QLDC unfettered discretion to set the fee amount, which risks being disproportionate and may deter individuals from applying for consent, undermining the purpose of the discretionary pathway. Second, this charge may constitute a fee for the purposes of Clause 5(3)(b) of the FCA as a person cannot freedom camp without approval, which will only be granted subject to paying a fee.

### Comments on the Restricted Areas

- 40 We support freedom camping at all Schedule 1A locations. However, we oppose the proposed arrival and departure times, which do not reflect the typical behaviour of responsible campers. Many prefer to arrive in the afternoon, dine locally, and depart late morning after breakfast. These unnecessary and disproportionate time restrictions are unreasonable and may unintentionally discourage use of the sites by responsible campers, and instead increase use by the minority of irresponsible campers.
- 41 Additionally, it is unclear whether the restricted carparks have been designed to safely accommodate the proposed number of vehicles. For example, some compliant caravans (with tow vehicles) are up to 13 metres long, and most responsible campers prefer a 3-metre gap between vehicles for fire safety. While such spacing is not legally required, if the Council intends, for example, to provide space for 9 vehicles at the Queenstown Events Centre, it will need to designate at least 16 carparks to ensure safe and practical use.
- 42 The Kingston Road/SH6 carpark is already a well-established freedom camping site on NZTA land. Council applying to NZTA for control of this site does not expand the number of available

locations for responsible campers, as has been reported. We acknowledge the need for restrictions, given QLDC's concerns about long-term occupancy by some users, but this change in management should not be presented as increasing capacity for responsible camping.

- 43 Similarly, the Gibbston Highway/SH6 carpark is an existing NZTA managed site. The area has capacity for more than the two marked spaces proposed, as shown in the image below. We disagree with the reduced capacity and note that, to date, Council has not reported any issues with responsible campers using this location. Reducing capacity without clear justification risks undermining the effectiveness of the bylaw and unnecessarily limiting access.



## General comments – the Site Assessments

- 44 We have several concerns with the Tonkin & Taylor site assessments. Our primary concern is QLDC's decision to abandon the scoring matrix it relied on in 2021 in favour of a new "constraint level" approach. This change is significant. The previous matrix offered a replicable and more transparent framework for evaluating sites against the three statutory purposes under section 11 of the FCA. Each site was scored numerically across these criteria, enabling objective comparison and, importantly, public scrutiny. In contrast, the 2025 constraint methodology relies on subjective judgements from a wide range of subject matter experts across fields such as ecology, heritage, and transport. While expert input is valuable, this approach introduces greater risk of inconsistency and bias. The constraint levels of "hard," "consider," and "noted" are applied without a clear weighting system or explanation of how issues can be mitigated or conflicting constraints resolved. There is a lack of transparency around how final decisions are made, nor any pathway for public validation or challenge. This shift is particularly concerning as many of the areas that should have been made available for freedom camping in 2021 – had QLDC not considered irrelevant matters – remain prohibited



under the draft bylaw because of the new methodology. QLDC and Tonkin & Taylor appear to have identified new reasons to justify prohibitions that were not issues for the Council in 2021. This certainly appears like a retrospective attempt to rationalise a prohibitive bylaw rather than genuinely assess site suitability. It is, frankly, suspect policymaking and gives the impression that QLDC is backfilling justifications to maintain a restrictive regime.

- 45 The constraint-level methodology also risks overreach by defaulting to prohibition, even where adverse impacts could be mitigated, thus further undermining the permissive intent of the FCA and leading to decisions that do not meet the strict requirements in s 11 of the FCA. Moreover, the reliance on desktop assessments without any site visits means the assessment is only as good as the quality of the available data (some of which is incomplete or outdated). Furthermore, evaluators could easily overgeneralise issues and overlook site specific characterises or seasonal variations and dynamic context such as changing demand, weather-related accessibility, or temporary infrastructure that could make more sites suitable at certain times of the year. The absence of site visits weakens the reliability, fairness, and responsiveness of the statutorily required assessment process.
- 46 Page 23 suggests it is appropriate for QLDC to apply restrictions informed by rules and regulations made under other statutes, such as National Environmental Standards under the Resource Management Act 1991 (RMA). If QLDC is drawing on RMA-based frameworks to justify restrictions, it should also adopt well-established principles from RMA case law when assessing sites for responsible camping. Site visits are one example. Another is the *Blueskin Bay* case, where the Environment Court affirmed that the presence of rules does not imply inevitable non-compliance, rather, it is reasonable to expect users to comply with conditions. Applying this principle, responsible campers should be presumed to follow rules and behave appropriately, not be pre-emptively excluded assuming they will all flout the rules.
- 47 Page 41 confirms that QLDC instructed Tonkin & Taylor to automatically apply a hard constraint to reserve land governed by the Reserves Act, following Councillors' direction. Again, this is a flawed approach. Rather than assessing reserves on their merits under s 10 and 11 of the FCA, the report simply transposes inappropriately the starting point under the Reserves Act (that camping has to be specifically provided for) into the FCA framework. This undermines the statutory requirement for evidence-based, proportionate decision-making and bypasses the FCA's permissive starting point.
- 48 Page 63 applies a hard constraint to areas where camping vehicles can park in built-up urban areas, citing the need to protect residents' health, safety, and access. However, the same vehicles are permitted to park in these areas for day trips, shopping, and other excursions provided no one sleeps inside. This inconsistency highlights the disproportionate nature of the blanket ban applied to all urban roads. If the presence of camping vehicles is permitted during the day, and the effect of parking is deemed acceptable, it is unreasonable to prohibit overnight stays solely based on sleeping inside the vehicle, especially when no additional adverse effects are demonstrated. We recognise some roads have been impacted by access issues and consider the bylaw has to manage the effects on a case-by-case basis where limitations are justified, rather than a broad ban applied to all roads in urban locations.

- 49 The individual site assessments further expose the shortcomings of the Councillors' blanket exclusion of reserves and the methodology applied. For example, the report notes that some Lake Hayes Reserves and Pembroke Park in Wanaka could be considered suitable for freedom camping with appropriate transport restrictions. Both sites have RMPs that allow for camping subject to an enabling bylaw or QLDC exercising its delegated authority. Yet, despite this, they remain prohibited solely due to political instruction resulting from a closed mind and not because of any substantiated adverse impact that cannot be managed. This undermines the integrity of the assessment process and has led to an abdication of responsibility by failing to genuinely consider reserves in deciding how to manage freedom camping under available regulatory tools. This denies responsible campers access to well-suited locations.

## Conclusion

- 50 Overall, the NZMCA opposes the draft bylaw in its current form as it fails to uphold the permissive intent of the FCA and instead imposes blanket prohibitions across large areas of the district without sufficient evidence of necessity, appropriateness, or proportionality. The draft bylaw is similarly flawed in its approach to other areas it seeks to restrict, as the proposed limitations fail to meet the statutory justification required under s 11 of the FCA.
- 51 The decision to exclude reserve land from genuine consideration in how to manage freedom camping through the bylaw-making process and instead apply hard constraints without justification or site visits for suitable areas undermines the credibility and fairness of the site evaluation process. The constraint-level methodology appears to have been used to retrospectively justify a restrictive regime rather than genuinely assess site suitability. This approach is inconsistent with the High Court's findings in the *Marlborough* case, which emphasised that councils must conduct a genuine, site-specific assessment of each area and ensure that any restrictions are the most appropriate and proportionate response to the issues identified.
- 52 QLDC risks repeating the mistakes that led to the High Court's criticism of its 2019 bylaw, and the courts revocation of its 2021 bylaw. The draft bylaw also contradicts the Council's own strategic commitments to inclusive tourism and evidence-based decisions that both regulate and enable responsible camping. It disproportionately penalises the vast majority of campers who are responsible taxpayers, and ratepayers, who contribute to the district's local economy.
- 53 We urge QLDC to follow our recommendations, in particular to reassess urban roads and give genuine consideration to the part that land within reserves can contribute to freedom camping under the FCA framework. A review of the restrictions applied to rural roads is also essential, as the current approach appears to leave no safe or suitable locations for responsible camping. We acknowledge making these improvements may require substantive amendments to the draft bylaw and QLDC may have to re-consult the public. However, we suggest this will be more cost efficient than progressing a flawed outcome and can lead to a balanced, lawful, and inclusive bylaw. Not only is this readily achievable, but it is also essential to protect the rights of responsible New Zealanders and support the district's visitor economy.



# Kiwis helping Kiwis

## NZMCA supporting communities to help fund freedom camping initiatives.

Responsible freedom camping not only offers a fun, and family friendly way to enjoy the best of our unique country, it also benefits surrounding communities as campers spend locally on food, activities, and holiday souvenirs. But even bigger benefits are gained when freedom camping sites complement and enhance other recreational activities in the area.

As part of its commitment to supporting New Zealand's motorhome friendly communities, the NZMCA has recently supported a number of local authorities around New Zealand to help fund the development and enhancement of freedom camping sites.

pull together for the project, so having the NZMCA come on board was really positive and helped us secure that additional funding from central government."

The NZMCA provided \$10,000 of funding which was used to help install an improved surface on the parking area, bollards, rubbish bins, cold showers, and landscaping appropriate for the coastal environment. "Initially the plan was to have just a very basic surface and a toilet block, but the funding has allowed us to make the site more attractive and somewhere that is enjoyable to stay in," says Rebecca.

"Our members live in these areas too and so we're always open to supporting tourism initiatives that offer tangible benefits to the community too" says NZMCA National Manager – Property and Policy, James Imlach.

**"Projects such as this help to actively revitalise and regenerate the local environment which in turn has a positive impact on local communities."**

With a new NZMCA member site opening in Kaiaua soon, it's obvious that motorhomers have a desire to make the most of the region and all it has to offer. "This site will help cater for that demand and take the pressure off other busy sites like Ray's Rest."

Rebecca says she was surprised at how straightforward it was to apply for funding from the NZMCA. "They've been very supportive and helpful. I'd strongly recommend that other local authorities looking for funding for similar projects get in touch with the NZMCA."

"We have stayed here a few times ... a good spot that has done us well - parking for plenty of vehicles, easy access for big rigs. Has a rubbish bin." – Paul, Whangamata, January 2022.

"Lovely spot right by the water. Easy walk or bike ride to the Pink Shop for coffee etc, or fish n chips from Kaiaua Fisheries." – Pam, Whangaparaoa, December 2021

## A treat for trailblazers

The scenic 197km Hauraki Rail Trail cycle track runs from Matamata to Kaiaua and is a popular drawcard for motorhomers from all over New Zealand. The trail comprises five sections, with the most recent addition being the 10km extension that connects the trail from Pūkoro Mirando to Kaiaua.

A key part of completing the extension has been an overnight parking area for freedom campers starting the trail in Kaiaua. "We wanted to create a pleasant destination to stay in, not just a toilet stop," says Hauraki Council Community Development Advisor (Economic), Rebecca Jenks. "So we contacted the NZMCA and talked through the possibility of having some co-funding provided to help create a great parking area for motorhomers," she says.

"Prior to this, we'd applied to the Tourism Infrastructure Fund for funding toward the project. They are always keen to see that you've exercised all opportunities for co-funding. Our council unfortunately had a very low amount of co-funding that we could





## Barbecues by the bridge

With its beautiful West Coast landscape and a range of activities for all seasons, Greymouth is a popular spot for motorhomers to visit, and in fact was the NZMCA's first official Motorhome Friendly Town in the South Island.

A popular freedom camping spot in Greymouth is alongside Cobden Bridge, but with the area often becoming muddy, it was common for motorhomes to become stuck and require help to be pulled out.

When the local council recently reviewed its freedom camping bylaws, Engagement and Policy Facilitator Penny Kirk reached out to NZMCA National Manager – Property and Policy, James Imlach for advice.

**“James was extremely supportive in helping us look at ways to update our bylaw, and during that conversation the NZMCA offered funding toward improving the Cobden Bridge freedom camping site,”** she says.

The NZMCA provided \$5000 to help upgrade the area with suitable surfacing that would provide all-weather parking for all motorhomers. The parking spot accommodates around 20 motorhomes and is located within easy walking distance to supermarkets, cafes, and restaurants.

*“It was an amazing experience dealing with the NZMCA,” says Penny. “As an outside organisation, they were very willing to collaborate and work with us for the betterment of the area which is just awesome.”*

As well as upgrading the parking area, the NZMCA also contributed \$10,000 of funding to the Lions Club project to build a community shelter and a barbecue at the site. The project was spearheaded by Lions Club Greymouth member John Rothery.

*“We’d heard about the NZMCA from a friend who is a member and thought they might be keen to get involved with upgrading the area,” says John. “Motorhomers staying nearby would often be towing a boat and going off fishing, so I thought wouldn’t it be great to have a barbecue where they could cook up their catch afterwards?” he says.*

*“I couldn’t believe the fantastic response we got,” says John. “I spoke with James about the project and he got the ball rolling very quickly. And the good thing was once they had contributed, it made it much easier to approach others too.”*

*“Good spot, dogs ok. 10 min walk into town, 30 min walk along the stopbank to the river mouth and beach. Very little traffic noise overnight. Thanks GDC, very well kept area.” – Ann, Tauranga, March 2022*

*“Stayed for 2 nights, lovely and quiet most of the time. PDS as you enter the area with fresh water and good rubbish disposal facilities.” – Gordon, Waipukurau.*

# Submission

## Objection to Proposed Freedom Camping Bylaw 2025

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### **Submitter Address:**

45 Arrow Junction Road, Arrowtown

### **Regarding:**

Proposed Freedom Camping Bylaw 2025

### **Clause:**

8.3 – Restrictions on Freedom Camping on Certain Roads

### **Date:**

31 July 2025

## **1. Summary of Objection**

I submit strong opposition to allowing freedom camping on rural roads, and specifically Arrow Junction Road, proposed under the proposed Freedom Camping Bylaw 2025. I request Arrow Junction Rd be explicitly prohibited under Clause 8.3 due to consistent and unresolvable safety, sanitation, and amenity issues.

## **2. Grounds for Objection**

### **A. Safety Risks – Arrow Junction and Surrounding Rural Roads**

- Arrow Junction Road and many similar rural routes in the QLDC district lack adequate road width, have blind corners, no shoulders, and no designated parking areas.
- These roads are actively used by locals, tourists, pedestrians, cyclists (especially on the Gibbston Valley Trail), and horse riders, creating multiple points of potential conflict.
- Visibility is severely reduced in multiple areas, and parked campervans add serious risk of accidents, particularly at night or in adverse weather.
- Arrow Junction road speed limit is 80Ks which is above the speed recommended in the Tonkin and Taylor Summary report requested by QLDC on what areas of QLDC land should allow, restrict, or prohibit freedom camping. T&T advised that no roads with speed limits over 70kms /hr should allow freedom camping and then the Bylaw on page 5 clause 8.3 outlines the rules that relate to restricted parking. Many QLDC rural roads cannot comply with this.

## **B. No Infrastructure to Support Freedom Camping**

There are limited public toilet and waste disposal facilities on Arrow Junction Road, nor are there adequate facilities within reasonable proximity to support freedom camping. Facilities in the area are already under strain from existing day-use traffic, including cyclists, walkers, and equestrians using the Gibbston Valley Trail network.

The proposed bylaw would introduce significantly more pressure on an area that is fundamentally unsuited to camping-related waste.

Under the Resource Management Act 1991, Council has a duty to manage the use, development, and protection of natural and physical resources in a way that promotes the health and safety of communities, protects the quality of the environment, and ensures efficient use of public infrastructure funded by ratepayers. Allowing freedom camping in this location - without adequate toilets, rubbish disposal, or greywater management systems - contravenes these principles and exposes the area to serious environmental degradation, including:

- Contamination of waterways from human waste and detergents;
- Spread of litter and refuse in natural areas and private property;
- Irreversible impact on the natural landscape and visual amenity values

Permitting freedom camping in locations lacking appropriate sanitation infrastructure is irresponsible, unsustainable, and incompatible with Council's stated environmental and community wellbeing commitments.

## **C. Amenity and Nuisance Impacts**

- Residents and landowners frequently report issues arising from freedom campers which compromise enjoyment and use of the area by locals including families, school groups, walkers, and equestrian users.

These include:

- Noise and light disturbances at night
- Blocked accessways to private properties and driveways.
- Nuisance behavior from campers who overstay, set up awnings or cooking gear, and leave behind waste.

## **D. Request for Clarity and Consistency in the Bylaw**

- Clause 8.3 of the draft bylaw introduces confusion by listing restricted areas where camping may still occur, despite their inherent non-compliance with bylaw safety or sanitary requirements.
- Because there is no feasible way for responsible or lawful freedom camping to occur on them; Rural Roads including Arrow Junction Rd should be clearly marked as "Prohibited" rather than "Restricted"



### 3. Legal and Governance Considerations

#### A. Local Government Act 2002 – Section 10

QLDC is required to promote the social, economic, environmental, and cultural wellbeing of communities. Allowing freedom camping on unsafe and inappropriate rural roads fails to meet these obligations.

#### B. Reserves Act 1977

There are areas along Arrow Junction Road adjacent to or associated with land managed under the Reserves Act. Freedom camping in these areas may conflict with statutory protection.

#### C. Call for Referendum and Ratepayer Consultation

- A local referendum or targeted community consultation should determine whether freedom camping should be permitted on rural roads.
- Ratepayer views must be more significantly weighted in Council decisions.

### 4. Supporting Reports and Evidence

I refer Council to:

- The Tonkin + Taylor Technical Report which highlights the environmental pressures of unmanaged camping.
- The Council Statement Report, which acknowledges the significant social and amenity impacts of unregulated freedom camping activity.

### 5. Requested Outcome

- That Arrow Junction Road and similar rural roads without services or adequate road width be reclassified as Prohibited Areas under Clause 8.3.
- That a more proactive and structured consultation with affected rural communities be undertaken.
- That QLDC commits to enforcement resources to uphold the bylaw and reduce amenity loss for residents.

Thank you for considering this submission. I welcome the opportunity for further discussion and would be happy to clarify any points if requested.

Regards

James Heyward

[admin@arrowstudios.co.nz](mailto:admin@arrowstudios.co.nz)

+64 21 367 360

# QLDCs contempt of New Zealand Courts

August 7th, 2025

In September of 2024, the high court of New Zealand decided that Queenstown Lakes District Council QLDC, was acting ultra vires regarding its camping bylaws.

As of August 1st, eleven months later, the signs threatening tourists with \$800 fines were still present at many if not all locations where such fines were deemed illegal. This is strong evidence of contempt of court, showing strong misalignment between local and state government in New Zealand.

Moreover, QLDC has continued its flagrant disregard for New Zealand Law by proposing a new bylaw with total disregard for New Zealand law, particularly the New Zealand Transport Act requiring that there be places for drivers to pull over to rest or sleep.

The argument for preventing tent cities is very different from the argument for preventing citizens and tourists from stopping on the side of the road in self contained vehicles which do not block access, create safety hazards or cause environmental harm.

The actual motivation for the rapid recreation of new bylaws which are substantially identical to ones struck down by the high court is more likely jealousy at the degree of liberty provided by traveling lifestyles and commercial interests on waterfront adjacent properties than any kind of genuine bylaw grounds permitted by the freedom camping act.

The banning of self-contained vehicles in thousands of parking places is an inappropriate response to misplaced defecations by people who do not have self-contained vehicles.

Re: Draft Freedom Camping Bylaw 2025 – Opposition to Freedom Camping on Rutherford Road (Lake Hayes)/ Waiwhakaata.

### Introduction & Summary

I write in strong opposition to the proposal to permit freedom camping on Rutherford Road — a narrow rural road providing key access to the northern edge of Waiwhakaata / Lake Hayes. As a local resident, a member of the Lake Hayes Strategy Group, and a kaitiaki of this whenua and wai, I have been actively involved in efforts to restore water quality, revegetate wetlands, and address sediment and ecological degradation in this area.

Permitting freedom camping on Rutherford Road would directly undermine these efforts and jeopardise the cultural, ecological, and recreational values that our community, hapū, and environmental organisations have worked tirelessly to protect.

### **Council's Proposed Provisions & Rationale**

The draft bylaw proposes to permit freedom camping on most rural roads in the district, including Rutherford Road, under the following conditions:

- Vehicles (or tents) must be certified self-contained
- Campers must park at least 5 m from the sealed edge or hard shoulder
- Camping must occur on a formed gravel or sealed surface
- Campers must remain within 2 m of their vehicle or tent
- Stays are limited to two nights in any 30-day period

These provisions aim to meet the criteria set out in the Freedom Camping Act 2011: protecting public access, health and safety, and the natural environment.

However, in the case of Rutherford Road, these criteria would not be upheld — and in fact, would be actively compromised.

### Reasons for Opposition

#### 1. Contradicts Ecological Restoration and Catchment Work

The Lake Hayes Strategy Group — comprising representatives from Friends of Lake Hayes, Mana Tāhuna, Kāi Tahu, DoC, Otago Regional Council, and QLDC — has committed extensive time and resources to ecological restoration efforts around Waiwhakaata. This includes sediment traps, riparian planting, wetland restoration, and pest and weed control, much of which is concentrated at the northern end of the lake, accessed via Rutherford Road.

Introducing freedom camping to this sensitive area threatens to undo this work. Risks include littering, illegal wastewater discharge, trampling of revegetated areas, and increased erosion — all of which jeopardise progress made to restore and protect this vulnerable environment.

It is especially concerning that the consultants engaged to assist QLDC in drafting the bylaw appeared to lack a working knowledge of the ecological significance of this area. If they had been adequately informed, Rutherford Road would have been excluded from the permitted zones — just as other roads around Lake Hayes have been. It is unclear why Rutherford Road has been included when other equally or less sensitive roads have been excluded.

## 2. Safety, Access, and Inappropriate Road Design

Rutherford Road is a narrow, lightly maintained rural road already under strain from regular use by residents, cyclists, walkers, and lake users launching paddleboards and kayaks.

Permitting freedom camping here — particularly if it becomes the only available site nearby — would greatly increase congestion. Turning areas are limited, and the road is not designed to support larger vehicles or high volumes of traffic. Access for emergency services could also be compromised, especially in the turning circle at the lake edge which is critical for fire response in the absence of hydrants.

This is not a hypothetical risk. A previous fire on the hillside behind Rutherford Road, caused by campers lighting a fire to cook, posed a very real threat to nearby homes. Blocking emergency access with parked campervans or tents would place lives and property at risk.

## 3. Questionable Definition of “Self-Contained” Camping

The bylaw appears to allow tents to be considered self-contained, which is difficult to justify. Tents generally do not meet the basic criteria for self-containment — especially in relation to greywater or toilet facilities.

Without clear, enforceable standards, this will open the door to non-compliant camping. In practice, we have seen campers in uncertified vehicles or tents leave behind toilet waste, rubbish, and greywater — all of which negatively impact public health and the surrounding ecosystem.

## 4. Ongoing Failure of Monitoring and Enforcement

Freedom campers on Rutherford Road have already caused repeated harm, including:

- Damage to grass verges
- Littering, including toilet paper left in public and recreational areas
- Camping directly outside private residences
- Use of non-compliant vehicles without facilities

Council enforcement has so far proven inadequate, and there is no evidence to suggest this will change under the proposed bylaw. Without active monitoring, the bylaw is unenforceable in practice, and residents are left to bear the burden of clean-up and conflict.

Stating that only certified vehicles are allowed is not enough. Rules without enforcement will continue to be ignored.

## 5. Cultural Significance and Kaitiakitanga

**Waiwhakaata is of immense cultural and spiritual significance to Kāi Tahu. The name reflects the lake's sacred mirrored surface — a taonga, not simply a recreational asset.**

Allowing freedom camping, particularly where it has led to human waste and rubbish in culturally significant spaces, undermines the principles of Kaitiakitanga and the responsibilities we hold to protect this place for future generations. The lake and its margins have whakapapa and Wairua — these values must be upheld.

## 6. Lack of Consultation with Rutherford Road Residents

There was no meaningful consultation with residents of Rutherford Road, despite it being the only road surrounding Lake Hayes proposed for freedom camping under the draft bylaw.

Other access roads have rightly been excluded — yet Rutherford Road remains. Had residents, iwi, and local stewardship groups been consulted at the outset, this location would not have been considered appropriate.

## Proposed Amendments

I respectfully request that QLDC:

1. Remove Rutherford Road from the permitted freedom camping list
  - This would protect a culturally and ecologically sensitive area that has already undergone significant restoration.
  - It would align the bylaw with its own objectives of protecting health, safety, and access.
2. Ensure consultants and planners engage with local knowledge
  - Any future decisions around zoning for freedom camping must include meaningful input from affected communities, iwi, and environmental groups.
3. Restrict freedom camping to designated car parks with facilities
  - QLDC has identified over 150 designated spaces across 15 appropriate locations.
  - Rutherford Road lacks basic infrastructure and is too far from the nearest public toilet block, making it likely that waste will enter the surrounding environment — especially problematic at a family swimming location.
- 4. Clarify and enforce a meaningful definition of “self-contained”**
  - Tents should not be considered self-contained unless they meet all the same waste disposal criteria as vehicles.
  - Enforcement should be proactive, not reliant on complaints or passive monitoring.
5. Engage directly with Rutherford Road residents and local stewardship groups
  - Groups like the Lake Hayes Strategy Group and Friends of Lake Hayes offer invaluable local insight and should be central to decisions affecting this taonga.

## Conclusion

In light of the concerns outlined above, I strongly urge the Council to remove Rutherford Road from the list of permitted freedom camping areas in the Draft Freedom Camping Bylaw 2025.

The road is fundamentally unsuitable due to its narrow design, lack of infrastructure, environmental vulnerability, and the safety risks it poses. It also fails to uphold the cultural and community values associated with Waiwhakaata.

I support responsible, well-managed tourism — but this must be balanced with local needs, environmental protection, and cultural respect. Freedom camping on Rutherford Road fails on all counts.

Permitting it would result in irreversible harm to a vulnerable environment currently undergoing active restoration, while also diminishing the wellbeing of residents who have long been its stewards.

Ngā mihi nui,

Gill Hopkins

Local resident, member of the Lake Hayes Strategy Group, and a kaitiaki of Waiwhakaata.

## **Submission on Draft Freedom Camping Bylaw 2025**

**Submitter:** Erica Walker

**Date:** 25 July 2025

### **General Comments:**

I support the intent of the proposed Freedom Camping Bylaw 2025, particularly its focus on protecting the environment, ensuring public health and safety, and maintaining access to key areas. However, I strongly believe that the provisions need to go further, particularly in terms of restricting and enforcing freedom camping activity across the district. Particularly around enforcement measures and self-contained vehicles.

Queenstown Lakes is a region of outstanding natural beauty, ecological sensitivity, and limited infrastructure. It continues to face significant pressure from high volumes of low-spend visitors seeking to minimise their costs by exploiting publicly accessible land for overnight stays. While freedom camping is often framed as a form of traveller autonomy, in practice it places undue burden on communities, ratepayers, and the environment. It is often commented from freedom campers that they heard New Zealand is particularly easy to freedom camp, and unfortunately word has spread around the globe. We need to change this narrative, if we want to protect our natural environment.

Going forward, we have an opportunity as a District to change the narrative on freedom camping. Changes need to occur in conjunction with Regional Councils, other District Councils, The Department of Conservation and Central Government.

### **Key Points:**

#### **1. There is no genuine room for freedom camping in this district**

Despite the proposed restrictions, the scale and impact of freedom camping across the district has shown that even limited allowances often lead to large-scale degradation of public spaces. The cumulative impact, such as waste disposal, pollution, fire risk, and informal settlement behaviour, are well-documented and not always mitigated by self-containment certification. Given the already fragile state of infrastructure in many areas, true 'freedom' camping (i.e., without commercial oversight) should be largely phased out in favour of managed alternatives. On balance however the bylaw is a step forward, and understanding is given that there will be massive opposition to removing freedom camping completely.

#### **2. Schedule 1A and 1B areas should be reviewed for possible removal**

The inclusion of restricted freedom camping areas still leaves many public locations vulnerable. These should be reviewed with a precautionary lens and significantly reduced or removed where there is any uncertainty about infrastructure capacity, ecological risk, or proximity to residential areas.

#### **3. The Chief Executive's temporary powers under clause 9 should be expanded**

Clause 9 appropriately allows temporary changes, but these powers should be broadened with specific triggers, including excessive volumes, visible degradation, or complaints, to enable rapid response. Long-term use of temporary bans may be warranted in overused areas.

#### **4. Enforcement is essential**

Clause 13 and 14 need strong, visible follow-through. Infringement penalties must be consistently applied, and enforcement officer capacity should be increased. A bylaw without regular enforcement risks being symbolic only. Enforcement needs to be undertaken by qualified personnel with training on de-escalation and people management, quality enforcement is key and letting it slide early will have massive long-term implications.

#### **5. Tourism strategy must focus on quality, not quantity**

This bylaw should be seen as one tool among many to reposition the district's visitor strategy. Prioritising high-quality, higher-value visitors over low-spend volume tourism is necessary to protect both community amenity and the long-term reputation of the region. This needs to come along with lobbying central government to stop the push for tourism and enable high value low volume vs low value high



numbers. We need to make it hard for freedom camping, to discourage and change the views of New Zealand that have systemically caused these issues.

**Conclusion:**

The draft bylaw is a welcome step, but it must be seen as a transitional instrument toward the eventual removal of unregulated or poorly enforced freedom camping in Queenstown Lakes District. Public land is not a free motel, and continued leniency only normalises behaviour that degrades the very values that make this region special.

Thank you for the opportunity to provide feedback.

Kind regards,  
Erica Walker

6 August 2025

[REDACTED], Wanaka 9382, NEW ZEALAND

TO: Queenstown Lakes District Council

REGARDING: DRAFT FREEDOM CAMPING BYLAW

Dear QLDC team,

Thank you for the opportunity to make a submission regarding QLDC's draft Freedom Camping bylaw. Firstly, I would like to commend QLDC for your efforts to control freedom camping. It is a shame your previous effort was thwarted by the NZMHA.

This submission is made on behalf of myself, my wife and my two primary school age daughters who all reside at [REDACTED] Tuohys Gully Road, (Cardrona) Wanaka 9382.

In the draft bylaw, QLDC has proposed that Tuohys Gully Road (**TGR**) is included as a Restricted Freedom Camping Area. Tuohys Gully Road runs between Cardrona Valley Road and DOC's Meg Track car park.

This proposal presents a serious threat to public and resident safety and carries an unacceptable risk of unauthorized access, trespass, and environmental degradation.

PLEASE SEE FIGURES 1 – 3 ATTACHED BELOW FOR MAPS OF THE DISCUSSED AREA

### **Key Concerns**

#### **Unacceptable Risks to Resident and Public Safety**

Allowing freedom camping on Tuohy's Gully Road directly jeopardizes the safety of residents and the public under the Health and Safety in the Workplace Act (2016)

Operational Interference: Our neighbours, Cardrona Valley Farm Ltd (**CVFL**), routinely move livestock (sheep, cattle) along this quiet rural road and operate heavy farm machinery at various times, day and night. CVFL work alongside all other road users in the area to mitigate risk and their liability is already high due to the many and varied 'overlapping duties' in this area.

Introducing freedom campers would significantly increase the risk of vehicle and stock-related incidents, disrupt daily farming activities, and pose ongoing and varied security risks.

Tuohy's Gully Road also serves as an active thoroughfare for several third-party businesses operational in the area. These businesses have significant health and safety obligations:

- **The Cardrona Horse Trekking and Motorbike Tours:** Operates daily throughout the year, with horses and motorbikes using this road section.
- **Southern Hemisphere Proving Ground (SHPG):** Accesses CVFL's private road (access road to SnowFarm) via Tuohy's Gully Road at various times, day and night throughout the year. CVFL has authorized SHPG to manage this access road.

Privacy and Trespass: The proposed Restricted Freedom Camping Area intersects with our privately owned land. Permitting vehicles to pull off the road and park poses a significant risk of unauthorized access and

trespass, which would have substantial privacy implications for my family as well as my neighbours who reside adjacent to and near TGR.

A small triangle of land (shown in Figure 3) is of major concern to us as this area is adjacent to the boundary of my property.

Freedom campers would be able to park on this site if Tuohys Gully Road is included as a Restricted Freedom Camping Area.

My house is located in Figure 3 where the number "1" is marked.

I can see the small triangle area from all living spaces in my house. Conversely, anyone camping in that area would have visibility straight into my house.

I have a high level of concern for my family's privacy being drastically reduced.

Fire Risk: Rural roadsides in Central Otago and the Upper Clutha are high-risk fire zones, especially during dry periods, i.e. for the duration of summertime – the busiest time of year for freedom campers.

Freedom campers using stoves, smoking cigarettes or having BBQs pose a severe fire hazard, as demonstrated by past events like the Twizel fires.

Visual Impact: The presence of parked campervans and associated activity would decrease the visual quality for ourselves along with the neighbouring dwellings located within 1km of this rural road.

### **Inadequate Justification and Site Assessment**

The Council Report's rationale for including rural roads is contradictory and lacks critical assessment:

Contradictory Data: Item 39 of the Council Report notes that the majority of infringements and complaints do not relate to rural roads, undermining the justification for their inclusion.

No Site-Specific Assessments: Item 37 confirms that no site-specific assessments have been carried out on rural roads.

This is a critical oversight, as areas along Tuohy's Gully Road are typically narrow, grassed and tree-lined, with minimal layby areas.

We struggle to identify any sections that would realistically comply with the proposed bylaw's conditions, given the presence of private driveway entrances and paddock accessways.

### **Unfair Burden and Widespread Non-Compliance**

The bylaw places an unfair and dangerous burden on rural landowners, who are left to manage the consequences of non-compliance without adequate support.

Enforcement Challenges: Due to the remoteness of Tuohys Gully Road, enforcement will inevitably fall on landowners, forcing us into difficult and potentially dangerous confrontations with campers at all hours of the night.

**Observed Non-Compliance:** Despite the requirement for certified self-contained vehicles, non-compliance is widespread. We have ongoing issues when:

- people venture and park on private property (this is already a problem we and CVFL must manage)
- people defecate/urinate along fence lines and in neighbouring paddocks / treelines.
- campers setting up directly next to our rural mailbox and access gates.
- freedom campers' litter (we have previously had to clean up broken bottles, cans, cooking/food waste and human waste left behind by campers).

**Landowner Subsidisation:** Expanding freedom camping on rural roads will only magnify these existing problems. We, as landowners, are forced to clean up this waste and manage these risks.

### **Environmental Degradation and Impact on Other Users**

The proposed bylaw poses significant environmental risks and diminishes the experience for other recreational users.

**Environmental Management:** CVFL operates an environmental plan that includes a strong focus on biodiversity and pest control. Their team actively monitors and works to protect specific species, including the Kārearea (NZ Falcon) and Otago Flathead Galaxias. These protected species live and reproduce in the waterways and trees close to Tuohy's Gully Road and would be negatively influenced by the increased overnight traffic in the area. Parker Conservation is an organisation funded by the community to learn and protect the native species in our area with a particular focus on the Karearea.

As part of CVFL's commitment to environmental stewardship, they work with other large landowners in the Cardrona Valley on a collaborative and systematic pest control program. They target a range of pests, including rabbits, pigs, possums, ferrets, rats, and stoats. Their methods involve both poisoning and a seasonal night shooter who operates on the road to manage these populations.

Southern Sanctuaries and Cardona Alpine resorts have been instrumental in developing a community trapping program operational in the area along TGR (I am the community coordinator of the trapping line). There is an obvious danger to any freedom campers who may interact with a set trap (e.g. DOC 200).

**Sanitation Issues:** The high likelihood of campers defecating and urinating on private land, rather than using onboard facilities, leads to waterway pollution, general unpleasantness, and degradation of the natural environment.

### **Tuohys Gully Stream runs through the Meg Track car park and then flows into and through my property.**

Despite encouragement to do otherwise, freedom campers will wash in the stream and urinate/defecate immediately adjacent to the stream. There are no toilets in the car park, there are few bushes to hide behind and there is a steep open slope on the other side of the stream. There is simply nowhere else on the site for them to go, except on adjacent private land or immediately beside the stream.

**Waste Management:** Beyond human waste, issues with general rubbish management are prevalent.

**Diminished Recreational Experience:** Tuohy's Gully Road is used by walkers and bikers accessing the Meg Pack Track, (via an easement provided to DOC by CVFL) to allow access to the Meg Hut and Pisa Range Area. The presence of parked campervans, litter, human waste or greywater runoff along the trail diminishes their experience, reduces their solitude, and could lead to user conflict.

### **Confusion and Liability**

The bylaw creates confusion for visitors and significant liability concerns for landowners.

Misleading "Restricted Camping" Label:

Due to the nature of the surrounding area, which includes the Snowfarm/SHPG/DOC access road and the Meg Pack Track DOC carpark, using a 'restricted camping' label could dangerously mislead visitors about permitted activities. This confusion could result in unauthorized access or other safety issues.

Unclear Responsibility: Who is responsible for managing and policing compliance on remote rural roads? Who is responsible for recovering vehicles that get stuck or damaged during civil emergencies (e.g., floods, fires)?

Visitor Misinterpretation: The bylaw and maps are difficult for visitors, especially those unfamiliar with New Zealand's land tenure, to interpret. Tourists may not understand where public roads end and private land begins, or may not speak/read English so be unable to read any signs posted, websites, QLDC information, etc.

**Alternative Proposal: Designated Freedom Camping Areas with Facilities**

We strongly advocate for a model where freedom camping is only permitted in designated locations with appropriate facilities, such as the Luggate Red Bridge site. These areas utilize public land with minimal impact on communities, offering toilets, monitoring, and basic amenities.

There is ample public land in the region suitable for legal camping, which are far more appropriate than fragile rural road corridors with multi-use pressures. The draft bylaw's reliance on "restricted" rules (certified vehicles, marked areas, time limits) does not explain how this will be enforced in remote rural settings.

**Recommendations**

We urge QLDC to adopt a more balanced, evidence-based approach and request the following:

- Redefine Tuohy's Gully Road from the proposed RESTRICTED area to a PROHIBITED area.
- Define the SnowFarm/SHPG/DOC access road to the Pisa to a PROHIBITED area.
- Remove all rural road corridors from the proposed restricted areas unless fully consented by the adjacent landowner/s.
- Prioritise investment in designated freedom camping areas with proper facilities and monitoring.
- Strengthen enforcement mechanisms and increase ranger presence during peak seasons.
- Engage with rural communities to co-design solutions that balance visitor access with local wellbeing.

**Conclusion**

While well-intentioned, the proposed by law requires significant revision to ensure it effectively protects the environment, manages health and safety risks and respects existing businesses and local communities.

Allowing freedom campers to park adjacent to local resident's property boundaries and businesses comes at no cost to the campers, but at a high cost to the private land/business owner in terms of safety, privacy, risk, and environmental protection.

Sincerely,

Glenn Dawson & Georgia Lockhart-Adams

FIGURE 1

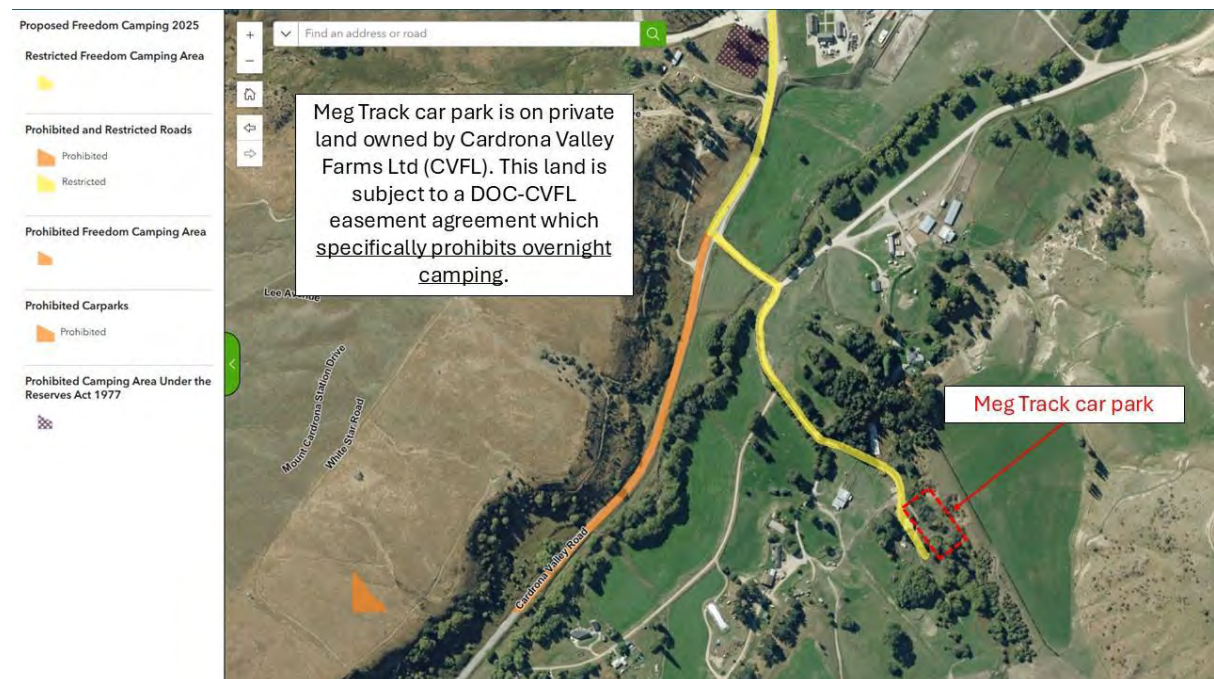


FIGURE 2





FIGURE 3



# SUBMISSION



TELEPHONE 0800 327 646 | WEBSITE [WWW.FEDFARM.ORG.NZ](http://WWW.FEDFARM.ORG.NZ)

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To: **Queenstown Lakes District Council**

On the: **Draft Freedom Camping Bylaw 2025**

By: **Federated Farmers of New Zealand**

Date: **8 August 2025**

Submitter: Otago Federated Farmers of New Zealand

**LUKE KANE**

**OTAGO PROVINCIAL PRESIDENT**

Contact: Eleanor Linscott

**South Island Regional Policy Manger**

Federated Farmers of New Zealand

**P:** [REDACTED]

**E:** [REDACTED]

## INTRODUCTION

Otago Federated Farmers appreciates the opportunity to comment on the Draft Freedom Camping Bylaw 2025. We support the need for a Freedom Camping Bylaw to protect our environment, the health and safety of residents and visitors, and protecting access to our wilderness for all. We acknowledge the limitations imposed under the Freedom Camping Act 2011.

Tourism is a major economic contributor to the Queenstown Lakes District. We appreciate that freedom camping provides tourists an opportunity to connect with rural New Zealand in ways that commercial campgrounds may not, and it helps ensure the district is a holiday-friendly region for all budgets. Our concerns relate to the downsides that accompany freedom camping, and our submission seeks to find a way for these issues to be appropriately managed within the framework the Council must operate. To protect neighbouring properties and ensure Queenstown Lakes District is accessible to everyone, freedom camping requirements must be publicised, known and understood, popular sites well-managed and properly enforced.

Most farmers have a story to tell about freedom campers. Their experiences range from human-waste and rubbish being deposited near their yards, houses, driveways, or roadside paddocks; Fires being lit despite fire bans; dogs straying and hassling stock and wildlife; vehicles blocking gates or interfering with stock movement; visitors asking for directions or help; farm dogs rolling in human waste; noise and anti-social behaviour; and trespass related safety issues.

In the Queenstown Lakes District, our members use, live and farm beside rural roads, which are proposed as freedom camping sites, and as such their day-to-day lives are directly affected by this Bylaw.

There are discussions going on at both national and regional levels about the future of tourism in New Zealand and what sustainable tourism means. We have arguably reached a time when user pays principles must apply to freedom camping so that we can better protect our environment, especially our sensitive alpine areas, lakes and rivers, managed by cash-strapped councils such as Queenstown Lakes.

## **GENERAL SUBMISSION**

Federated Farmers are concerned that the proposed Bylaw will encourage freedom campers from the limited urban areas designated for camping, to the rural area.

Key concerns from local landowners include practical considerations of how freedom camping will be managed. The numbers of freedom campers for the district are increasing, and difficult to police. A bylaw is only effective if it can be consistently enforced, and a lack of enforcement could leave farmers to deal with problems of irresponsible camping on their own.

Even though the freedom campers are required to be self-contained, anecdotal comments from farmers suggest that many campers do not adhere to this restriction. With the difficulty to monitor and enforce compliance, it inevitably puts pressure on the local water quality.

Many of the remote rural locations do not have cell phone coverage or services available, and farmers are often left to provide roadside assistance (e.g. towing stuck vehicles) when campers park off-road. For example, on some rural roads there are no fences to delineate the boundary between road reserve and private land, and campers will park in paddocks. If it rains or snows, campers get stuck and need assistance.

Some farms have threatened indigenous species that the farmers have worked hard to put in place protections and a safe environment, only to find freedom campers parking with unrestrained dogs. Other farmers have raised health and safety concerns. Some of the roads are not physically safe to park.

Some roads go through yards or areas where there is stock. With lambing season approaching, landowner concerns will be with trying to manage livestock in one of the busiest times of the year and deal with tourists unused to NZ roads and farm systems.

Federated Farmers strongly encourages the Council to provide user pays designated areas for freedom campers that have appropriate facilities.

## PRIVATE LAND

The Freedom Camping Act 2011 (Act) applies to public land<sup>1</sup>. It does not regulate freedom camping on private land<sup>2</sup>.

Federated Farmers seek inclusion of a clause or note within the Bylaw, stating that:

- (a) the bylaw does not apply to private land, and does not grant authority to access or freedom camp on any private land; and
- (b) in relation to the definition of “freedom camp or freedom camping”, that “to camp... within 200m of an area accessible by motor vehicle” does not grant any authority to camp on private land within 200 m of a road.

We suggest that any educational materials produced for freedom campers should also provide advice as to how to determine if land is public or private.

## PROHIBITED AND RESTRICTED AREAS

Federated Farmers generally supports the draft Freedom Camping Bylaw 2025 including prohibited and restricted freedom camping areas.

We generally support provision for allowing freedom camping in 15 areas of public land, including carparks in urban settlement areas, subject to specific conditions, as shown in Schedule 1A.

However, we are particularly concerned about the proposal to allow freedom camping on most rural roads, as shown in Schedule 1B. While we support the proposed restrictions in clause 8.3, including that the motor vehicle is:

- (a) certified self-contained;
- (b) located a minimum of 5 metres from the nearest edge of the road hard shoulder, or edge of the seal;
- (c) located to ensure other people can stop their motor vehicle;
- (d) positioned only on a formed gravel or sealed surface;
- (e) within 2 meters of camping equipment and personal items;
- (f) not allowed to stay more than 2 nights;
- (g) can't leave any waste; and
- (h) not light any fires,

we note that some of the roads identified in Schedule 1B are not wide enough, and without gravel or sealed laybys, such that these requirements cannot be met. If the physical requirements cannot be

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<sup>1</sup> Section 3(2)

<sup>2</sup> Section 3(4)

met, then the road (or portion thereof) should be removed from the maps in Schedule 1B. Further, some roads shown are effectively farm driveways, and these too, should be removed.

We also request that freedom camping is prohibited or restricted, within 500 metres of a rural dwelling or workplace. This would provide the rural community with a similar degree of personal privacy and security as provided for in the Bylaw through its prohibition on freedom camping in urban areas through Schedule 2.

## **ENFORCEMENT**

While the Bylaw seeks to restrict the negative impacts of freedom camping, farmers are concerned about how the Bylaw will be implemented, particularly in rural areas where the line between public and private land can be blurred and where the effects of poor camping behaviour can have a direct and costly impact on their livelihoods.

Ultimately, the success of the Bylaw will depend on its proactive monitoring and enforcement. Federated Farmers is concerned that Council will lack the funds to properly maintain and enforce the activities. The Council expects the bylaw to increase infringement revenue. Time will tell whether this is achievable. We encourage and support the QLDC in ensuring proactive monitoring and enforcement are undertaken, including in remote rural areas.

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Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents many farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers. The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment.
- Our members' families and their staff have access to services essential to the needs of the rural community.
- Our members adopt responsible management and environmental practices.

This feedback represents the views of our members and reflects the fact that resource management and governance decisions have a daily impact on our member's lives, both as farmers and members of their local communities.





## DRAFT Submission Freedom Camping

### Submitter:

Esther Water

*Bachelor of Resource Studies, Master of Applied Science, Master of Creative Writing.*

### Date:

07/08/25

1. I am an ex-adventure tourism guide, whitewater kayaker and river advocate with a background and interest in planning and how we navigate our relationships with the environment.
2. This submission deals primarily with proposed freedom camping at Camp Hill Road carpark, a carpark currently in use by kayakers, surfers, cyclists, walkers, packrafters, clubs and school and community groups who undertake community planting in, or near, the carpark area.
3. A new walking/cycling track is planned on river right (RM250059). This goes from the dam at the outlet of Lake Hāwea to 'the Wave' at Hāwea Whitewater Park. The new walking/bike track will potentially see a rapid and sustained level of use, due to the fact that it forms part of a loop, with both parts of the loop, (appealingly), following the river.
4. It is likely that the river left Camphill Road carpark will see increased use as a result of this walking/biking track. The Upper Clutha Tracks Trust has clearly stated that they intend to direct track users to the river left Camphill Road carpark (the one proposed for freedom camping), rather than the carpark on river right where the track naturally ends (if doing the loop in an anti-clockwise direction) which is heavily used by kayakers. The river right carpark was established following negotiation between Contact Energy, the Department of Conservation and Central Otago Whitewater when the Hāwea Wave was constructed as mitigation for the drowning of rapids such Sargoods Weir, Bannockburn, and the Cromwell Gap. Access to this river right carpark is provided through an easement over private land, granted by the landowners to Central Otago Whitewater and Whitewater NZ and is conditional on no camping or fires in this carpark.
5. Queenstown Lakes District Council (QLDC) has proposed 43 freedom camping spots in Upper Clutha, and 158 in total in the district. In my previous submission in 2021 on the QLDC Freedom Camping Bylaw 2021, I stated I was *not* opposed to freedom camping, if it was well managed. Having now experienced the poor behaviour of some freedom campers, which includes rubbish, faeces, toilet paper and poor behaviour, it is very difficult to see what positive benefits freedom camping offers our environment and community. (I note that these problems come largely from campervans that are not actually self-contained and the disproportionate impact of the poor behaviour of a few).



6. In discussing freedom camping with many people, in order to try and find a perspective that differs from my own, I have not found one person yet that supports freedom camping (and I have tried to canvas widely). This suggests, anecdotally, that the community is not widely receptive to freedom camping. Many are concerned about the numbers (I am too). Much work will need to be done by QLDC around freedom camping to turn this attitude around - particularly in relation to 'Regenerative Tourism.'
7. QLDC's "Responsible Camping Strategy" states that "We cannot continue to operate as we always have – we must put the environment first, and ensure that our camping behaviours are sustainable and regenerative" and that "[. . .] our priorities are to use our resources wisely, explore financial options where campers pay for the facilities they use while in our region" (p2). I support the council's efforts to create and maintain areas where campers pay, even at low cost, to stay in our area. This type of solution offers the possibility that paying, even a small amount, might lead to a valuing by campers of the environment they are in. We already have this in place at Albert Town Campground. I use this area frequently (for slalom kayaking), and have never seen at capacity, even in the height of summer. Examples of how this is done well overseas includes the US National Park Service which offers low cost camping and basic facilities/amenities, for example non-reticulated toilet and potable water, similar to what the Department of Conservation offers in many DOC managed camping areas.
8. However, I understand that QLDC is required to provide for freedom camping under the Freedom Camping Act (2011) and is constrained in what it can and cannot limit by bylaw following the judicial review challenge by the New Zealand Motor Caravan Association (NZMCA). Therefore, with that in mind I turn to the specifics of the proposed freedom camping at Camphill carpark.
9. Queenstown Lakes District Council (QLDC) has suggested that 15 freedom camping spots be established in the Camphill Road carpark. In summer, the period of time when freedom campers are most likely to use this carpark, the carpark already sees moderate to heavy use. Therefore, I suggest that this is not an appropriate place for freedom camping, as it has the potential to compete with community amenity. At most, the number of five carparks should be provided for freedom camping, so as not to compete with existing users.
10. It is imperative that the carparks provided for freedom camping are marked, as without this it will be impossible for the Council to enforce the numbers of campervans.
11. I also support the following (as suggested by Council):
12. That time limits be set on when people arrive at these sites, and when they need to leave by.

13. That only freedom camping in registered/certified self-contained vehicles which have their own toilet and water facilities can take place.
14. That all personal items are contained within the marked space to prevent spill over into other areas.
15. No fires and no waste.
16. That freedom campers are not permitted to stay more than two nights within a 30-day period, and cannot return to any of the marked spaces within a 30-day period.
17. I request that if freedom camping is permitted here, that the carpark is established close to the entrance (east side) of the carpark. The west side of the carpark is where day users most commonly park as this gives them quickest access to the river track, often with bikes, pushchairs, packrafts or kayaks.
18. Another site of concern to kayakers, rafters and many other members of the community, is Rafters Rd. Similar to the north shore of Lake Hayes, before Covid the reserve at the bottom of Rafters Rd became wall-to-wall campervans each night with the single toilet overflowing and piles of faeces left throughout the reserve. To solve that problem, freedom camping was prohibited from Rafters Rd in the now-quashed 2021 bylaw. In the 2025 draft bylaw however, that zoning has now been changed to restricted. Similar to how the access road to the reserve on the north shore of Lake Hayes has been prohibited for freedom camping in the draft bylaw, Rafters Rd should also be prohibited for freedom camping
19. For the community to accept freedom camping as a positive activity for our community, this activity will need to be rigorously and efficiently enforced. My understanding is that enforcement is already in place. I request that you strengthen this team. For the community to accept freedom camping, we need to know that this is being managed well.
20. QLDC 's document "Responsible Camping Strategy" states that QLDC will provide opportunities for residents to be involved in camping management through the Responsible Camping Ambassador programme. I understand that the position typically runs from mid-late November through to April. Given the numbers of campers before the November date, I support that this position starts earlier.
21. I strongly request that QLDC review the allotment of sites in two years time. This provides the opportunity for the community and council to review whether the freedom camping in the designated places is working, and what changes need to be made.
22. The "Statement of Proposal: Draft Freedom Camping Bylaw 2025" document provided by QLDC identifies that this district is one of the most popular areas to freedom camp. It highlights that in 2024 there were 7,794 overnight freedom campers in this area (p1). It also

points out a total increase in numbers between 2008 – 2018 of 10,000 to 123,000 of *international* visitors practising freedom camping within New Zealand (p1). (Note that other sources of QLDC information the numbers are different – so that is confusing for the public). Based on the numbers contained within the “Statement of Proposal,” assuming a similar trajectory of growth, this sees us with 35,000 freedom campers in the QLDC area by 2030 and 123,000 by 2035.

23. I note that the above figure does not include domestic freedom campers, for example New Zealand members of the NZMCA, the organisation which has so stridently fought for the right to freedom camp (despite having their own camping areas – 63 in total and 59 for exclusive member use only, and which members are required to pay for), so the overall figures will likely be higher.
24. In conclusion, I strongly urge QLDC to limit the freedom camping in our district and to ensure that what is provided is strongly regulated in order to keep the community on board. Given the projected number of campers that will arrive in our district, I support several large sites (for example Red Bridge and the Recreation Centre) for freedom camping, rather than dispersed, small-scale camping throughout the district which will inevitably come under increasing pressure with the increase in numbers of freedom campers. Potentially – there are increased costs too associated with a more dispersed pattern of freedom camping. My concern is that by offering up smaller sites now, this will lead to a shifting baseline that results in “death-by-a-thousand-cuts.”
25. Therefore, with regard to the Camphill Road carpark, I prefer no freedom camping, but if that is not able to be achieved, request that the total number of freedom camping sites should be no more than five and with the proposed conditions outlined above.

Thank you and regards,

Esther Water

\*\* I would like to speak at the hearing.

## SUBMISSION ON THE DRAFT FREEDOM CAMPING BYLAW 2025

**Anna-Marie Chin**

I am submitting **against** the draft Freedom Camping Bylaw 2025 both in general and specifically.

I understand that there is a Freedom Camping Act that Councils have to comply with and unless the councils have a bylaw that can control restrict, have rules or prohibit freedom camping in their areas then freedom campers are allowed to park anywhere on council land. (this excludes reserves as these are controlled by the Reserves Act.)

Reading the information I have interpreted that QLDC has no current Bylaw and is wanting to put one in place before summer. when freedom camping becomes more prevalent. Below are my concerns for the district and our reputation as a tourist destination. To protect this district for enjoyment of the community we live in, the ability for us to enjoy this place as much as tourists.

I would like this submission to assist in QLDC being able to justify why these roads should be classified as Prohibited.

### **In general**

I am submitting against with regards the inclusion of roads in particular rural roads as Restricted Freedom Camping areas. All roads should be classified as **Prohibited**. If there has to be freedom camping it should be in designated areas only that are clearly defined, away from roads in areas that are safe for the users of which there are numerous areas already designated. To the sides of all roads freedom camping should be prohibited.

This keeps the Bylaw simple and easy to monitor and manage. There are no grey areas of interpretation on the restricted rules. The rules are open for interpretation and will only cause confusion and conflict especially when enforcement is required.

The idea that QLDC would even consider that it is acceptable for anyone let alone unpaying people to park on the side of the roads is unacceptable. As a start this is a conflict on the idea of New Zealand being clean and green. It is also a conflict with the one of the districts main revenue streams, tourism. Our sales pitch is the areas beauty-, by cluttering up road verges with random ability to park is incongruous with this.

This is not about stopping people coming in motor homes or self contained vehicles, it is about safety and management of our place for all and that includes our community, other tourists and visitors.

If QLDC is running out of areas that can be used as freedom camping areas then as a suggestion there should be a collaboration between QLDC and DOC to work out alternative places.

### **Specifically**

I am submitting against the Draft Freedom Camping Bylaw 2025 specifically in relation to the rural roads, Morven Ferry and Arrow Junction Rd being classified as Restricted. I live at the junction of these two roads and therefore I understand the impact of this bylaw for this area in

particular. In my opinion these two roads should be classified as **Prohibited**. My reasons and assessment for this are as follows

- a. Tonkin + Taylor has advised in their report that all roads with a speed limit over 70km/hr should be classified as **Prohibited** due to safety concerns. Both these roads are at 100km and 80km/hr respectively over the 70km threshold advised by Tonkin and Taylor.
- b. The Draft Freedom camping Bylaw 2025 notes the rules for restricted camping in clause 8.3. On these two roads you cannot comply with the rules for the pull off zone that is required under these rules, items (b), (c), (d) and (e) referenced below.

*(b) ensure that the side or part of the motor vehicle closest to the road (that is the carriageway) is located a minimum of 5 metres from the nearest edge of the road hard shoulder (where provided) or edge of seal (where no hard shoulder) at all times;*  
The road verges vary in width but are predominantly around the 5m width. And definitely too narrow to accommodate the 5m + vehicle+ 2m distance

*(c) ensure that the motor vehicle is positioned in a location to ensure any other person can stop their motor vehicle in the immediate area at all times for any other purpose (i.e. other than for freedom camping)*  
No sealed areas

*(d) ensure that the motor vehicle is only positioned on a formed gravel or sealed surface;*  
The only sealed areas along these roads are road accesses or driveways.

*(e) ensure any camping equipment and any other personal items are fully contained within 2 metres of the motor vehicle at all times, on a side of the vehicle away from the carriageway;*  
The width of the road verges is too narrow to accommodate the 5m + vehicle+ 2m distance

- c. Arrow Junction Road and part of Morven Ferry Road are the access trails as part of the Queenstown Trails. These roads are used extensively in the summer but also the winter by cyclists and residents coming too and from home. For motor vehicles to park along side this increase the safety of the users of the roads and it would become dangerous. It would also destroy the image of the cycling trail having vehicles parked on the road verges. Having said this it is not possible due to all the vegetation and undulation of the road verges, campervans are completely unable to park without damage.
- d. These roads that converge to form a no exit road. They provide access to many lifestyle blocks and large farms. In this immediate area there are many horses and ponies that are kept on these blocks. The riders including myself use the road verges to ride off the roads safely. It is also used by people walking their dogs, kids on bikes. If people were to park on these it would create issues whereby people and horses would have to use the roads to avoid these vehicles thereby making safety and congestion an issue. There is already concerns about the speeds of some vehicles who use these roads and having areas where you can ride safely especially with horses is very important

- e. The roads are bordered by undulating grass verges, mostly long grass, unmoved and left wild, general rural road verges. Unsuitable for parking on safely.
- f. These roads have large swales (small ditches) that control water run off from the road that make access to off road dangerous.
- g. There are 3 important fundamentals that need to be considered when deciding if areas are suitable. These are as follows; *the bylaw is necessary for one or more of the following purposes;*
  - (i) *to protect the area:*
  - (ii) *to protect the health and safety of people who may visit the area:*
  - (iii) *to protect access to the area; and*

The comments above confirm that having rural roads as restricted do not protect any of the above 3 items.

Therefore based on my comments above I submit against the draft Freedom Camping Bylaw in its current form and put forward that it should be changed to state that **all rural roads should be classified as Prohibited** and **in particular Morven ferry Rd and Arrow Junction Rd.**

I would like to be heard at the hearing.



15 August 2025

Freedom Camping Bylaw  
Queenstown District Council  
Queenstown 9348

By email: [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

Tourism Industry Aotearoa (TIA) welcomes the opportunity to provide a supporting submission to that of Holiday Parks New Zealand (HPNZ) on the Draft Freedom Camping Bylaw 2025.

TIA represents members from across the visitor economy, including Holiday Parks, many of whom operate in the Queenstown Lakes District. We recognise the value that freedom camping can bring to New Zealand's tourism offering when it is well-managed, appropriately located, and supported by suitable infrastructure and enforcement.

We support the concerns raised by HPNZ regarding the proximity of some proposed freedom camping sites to commercial holiday parks. These businesses make significant investments in facilities, staffing, and compliance, and play a key role in delivering a high-quality visitor experience. Locating designated freedom camping areas immediately adjacent to them risks unauthorised use of facilities, safety and security issues, and negative impacts on paying guests. TIA supports the suggestion of a minimum buffer zone between commercial campgrounds and freedom camping sites as a practical measure to reduce these risks.

TIA also shares HPNZ's concerns about the adequacy of enforcement, particularly in high-use areas and during peak seasons. Without consistent and visible monitoring, issues such as overcrowding, late-night disturbances, and non-compliance are likely to persist. Similarly, where proposed locations lack sufficient public facilities, there is an increased risk of environmental degradation, including waste disposal issues and damage to sensitive landscapes.

We encourage the Council to carefully consider site selection to avoid conflict between freedom camping and existing commercial accommodation, ensure adequate waste and amenity infrastructure is provided, and resource effective enforcement. We believe this approach will help protect the environment, safeguard community amenity, and support a high-quality visitor experience across the district.

Ngā mihi,

A handwritten signature in blue ink, appearing to read 'G Thomas', is written over a faint, light blue circular watermark.

Greg Thomas  
Acting Chief Executive

## DRAFT FREEDOM CAMPING BYLAW 2025 SUBMISSION

Philip (Phil) Michael Jones

Email: [REDACTED]

Location of residence: Queenstown

Do you wish to speak: Yes

Mobile Phone: [REDACTED]

I understand that my feedback is considered public information.

### **I support the overall approach**

#### **Why do I support it:**

The government has failed the communities by allowing freedom camping, but I believe that QLDC's approach is reasonable given the current situation.

#### **Other Comments on the Overall Approach:**

I believe that the proposed bylaw will only succeed if appropriate resourcing is provided to police it effectively. As a resident of Park Street, Queenstown I lived through the hugely negative impact of freedom campers setting up home in our street, with up to nearly 100 vehicles being recorded in the street at times. Many of the occupants showed scant regard for the community or environment, with instances of the lake being used for personal washing and dishwashing, and the foreshore being used as a toilet. Late night noise was a constant issue, including outdoor parties and all-night vehicle door slamming.

In lieu of any bylaw to curb such freedom camping on town centre streets the QLDC relied on the Summer Ambassadors to work with the campers and educate them. From my observations this was a total waste of time and ratepayer money. I saw no discernible change in the behaviour of the campers during or after visits by the ambassadors, and also observed a number of occasions where the ambassadors chose not to engage when there were clear issues to address.

This did not surprise me at all. From my experience as a police officer for over 46 years I believe that the use of short-term staff with limited training and no enforcement powers is pointless.

I believe that the QLDC needs to return to the employment of Freedom Camping Enforcement officers which existed in the past. These officers can seek to educate the campers but also have the authority to issue infringement notices when required. They were effective back in the day at knowing where and when the offending campers would be gathering, and took ownership of the problem. They also brought in some income to pay for their employment.

My understanding is that enforcement officers will be used when the Summer Ambassadors have failed to resolve the issue. From my experience over the past year these enforcement officers are often the on-call security company employees. They relied on the residents to alert them of issues, and were less than impressive in responding to calls for service.

In summary – unless this proposed bylaw is properly policed by the appropriate personnel it will fail.

**I support restricting freedom camping on rural roads.**

**Why I support it:**

As above I accept that the government has made things very difficult for the QLDC on the issue of freedom camping. I was, however, concerned that QLDC staff had not identified how many areas would fit within the category of being suitable for freedom camping before recommending it.

**I support prohibiting freedom camping on urban roads.**

**Why I support it:**

I have lived through many months of freedom camping on our urban road and experienced the chaos that resulted. Ignoring the obvious issues such as the damage to the environment I believe it is totally unacceptable for residents to have to put up with such a debacle.

**I have no comments on any of the specific locations.**

## Submission on QLDC Draft Freedom Camping Bylaw 2025

**Topic:** Selection of Rural Roads to be Restricted Freedom Camping Areas

**Submitter Name:** Mata Au Investments Ltd

**Contact:** Nicole Malpass, IP Solutions Ltd

[REDACTED]

[REDACTED]

**Date:** 7<sup>th</sup> August 2025

### 1.0 Overview

The submitter considers the bylaw as currently drafted to be fundamentally flawed and overly broad by its inclusion of many rural roads designated for restricted freedom camping, which cannot comply with said restrictions/criterion for compliance.

This submission focuses specifically on what roads the proposed bylaw seeks to identify as 'Restricted Freedom Camping Areas'.

The Submitter does support QLDC's goal of managing the impacts of freedom camping through legislating a robust bylaw framework and agrees that restrictive conditions applying to freedom camping on rural roads are appropriate in principle. Conditions will play a vital role in protecting the environment, health and safety of people, and the amenity associated with public use of roading networks.

However, this submission strongly urges QLDC to adopt a site-specific, evidence-based approach when identifying rural roads for Restricted Use. Roads that do not meet the criteria should be excluded from the final mapping.

Halliday Road, for example, cannot meet the proposed restrictions. A one-size-fits-all road classification ignores site-specific constraints, making it hard for campers to identify compliant locations on roads they presume are suitable. This will complicate

enforcement and lead to illegal camping and conflicts among landowners, road users, and campers.

## **2.0 Support for the Intent and Conditions**

The conditions outlined in Clause 8.3, such as maintaining a 5m buffer from the carriageway, using only sealed or gravel pull-offs, limiting stay duration, and prohibiting fire and waste, are justified and reflect sound risk management. It is prudent to restrict freedom camping in rural roadside areas where the combination of narrow shoulders, poor visibility, or environmental sensitivity poses a hazard.

These restrictions, as well as the identification of prohibited areas whereby high-speed roading environments exacerbate safety risks, are all supported.

## **3.0 Key Concerns**

### **3.1 Broad Inclusionary Approach**

Despite supporting the intent and conditions in principle as they relate to roads within the District, the somewhat blanket identification and mapping of rural roads where by Restrictive Use is proposed to apply, fails to account for the ability for those specific roads to comply (or not comply) with the criterion proposed. Nor the need for further nuances, as recognised by the technical assessment undertaken by Tonkin & Taylor.

*“TT advise that a site-specific assessment would be required to confirm the presence of such hard constraints and whether or not they are located in areas that could reasonably be used for freedom camping”.*

Despite this recognition, the draft bylaw and supporting documentation does not offer site-specific evidence to justify why each of these areas/roads have been deemed appropriate for restricted freedom camping. Instead, the bylaw identifies a vast number of rural roads in the district for restricted freedom camping, regardless of site-specific assessment that determines their appropriateness for such use. This approach is not evidence-based and does not comply with the intent of section 11(2) of the Freedom Camping Act 2011, which requires targeted regulation based on actual need.

### 3.2 Restrictive Conditions and Site-Specific Assessment of Halliday Road

In order to somewhat partially address this lack of site-specific assessment, this submission puts forward an assessment of one location; Halliday Road. See figure 1 below which depicts subject area and surrounds.



**Figure 1:** Aerial image of Halliday Road with Proposed Freedom Camping Bylaw 2025 overlay. Yellow indicating restricted road freedom camping area. Source: QLDC GIS.

As noted within the Tonkin & Taylor reporting;

*“Where the speed limit of a road is 70 km/h, the transport SMEs determined a high potential adverse impact on the health and safety of freedom campers and the public. Therefore, a hard constraint is applied to these areas, and freedom camping is not recommended on or immediately beside any high-speed road, in order to protect health and safety.”*

Clause 8.3 of the draft bylaw then imposes the following conditions the areas identified for rural road freedom camping:

- (a) use a certified self-contained motor vehicle;
- (b) ensure that the side of part of the motor vehicle closest to the road (that is the carriageway) is located a minimum of 5m from the nearest edge of the road hard shoulder (where provided) or edge of seal (where no hard shoulder) at all times;
- (c) ensure that the motor vehicle is positioned in a location to ensure any other person can stop their motor vehicle in the immediate area at all times for any other purpose (i.e. other than for freedom camping);
- (d) ensure that the motor vehicle is only positioned on a formed gravel or sealed surface;
- (e) ensure any camping equipment and any other personal items are fully contained within 2m of the motor vehicle at all times, on a side of the vehicle away from the carriageway;
- (f) not stay more than 2 nights within any 30 day period, and not return to any location within 500m of a location where the person has previously freedom camped;
- (g) not leave any waste;
- (h) not light any fires outside of the motor vehicle.

As noted, whilst these restrictions are understood and supported in principle as they will apply to the District, it is not possible for campers to find a compliant location along Halliday Road thereby making Halliday Road unsuitable for restricted freedom camping. Specifically, discounting vehicle crossings, there are no locations whereby a motor vehicle could park on a formed gravel or sealed surface which would be a minimum of 5m from the nearest edge of the road hard shoulder or edge of seal.

Of further concern, the Tonkin and Taylor assessment has clearly recommended that freedom camping should not be occurring along high-speed roading environments. In the instance of Halliday Road, the speed environment is 100km/h and therefore being subject to this hard constraint as defined, should be specifically identified as prohibited.



The inclusion and identification of such a road, subject to a hard constraint, whereby legal compliance becomes unreasonably difficult/impossible, is confusing and makes responsible camping unnecessarily challenging and confusing (campers will see roads on mapping/freedom camping information, only to suffer the confusion of 'where' such compliance can occur). This shortfall will facilitate an increased risk of illegal, unsafe, or unmanaged camping.

### **3.3 Contradiction with Responsible Camping Strategy and Tourism Values**

QLDC's own *Responsible Camping Strategy 2022–2027* supports a mix of regulatory and non-regulatory measures to manage camping, emphasising education, infrastructure, and local partnerships. Blanket restrictions across rural roads without site-specific assessment and informed designation are problematic for the following reasons:

- Contradicts the spirit of the strategy;
- Restricts and confuses travellers as to what areas are and are not designated for safe and responsible camping (the map shows one location, but on site assessment/search for compliance, certain roads classified will not offer compliance);
- Last minute failure to find compliance may push campers to less safe or ecologically sensitive sites not currently used;
- Risk increasing illegal or unmanaged camping.

## **4.0 Recommendations:**

1. Restrictive conditions upon rural roads in relation to freedom camping are generally well supported;
2. Undertake site-specific assessment upon designated rural roads, amending locations where appropriate, to ensure compliance is achievable and to avoid confusion. This may involve targeted, site-specific assessments of commonly used or potentially viable rural laybys and pull-offs to:
  - a. Determine which areas meet the bylaw's conditions,
  - b. Identify areas that cannot practically meet those conditions,
  - c. Inform improved signage and education for visitors.

3. Remove Halliday Road (and any other road which does not provide an opportunity for compliant freedom camping) from being a rural road identified for restricted freedom camping given there is no ability to comply with the conditions recommended.
4. Specifically, Halliday Road has a speed limit of 100km/h, and being subject to this hard constraint, should be identified as a prohibited area for freedom camping.

## **5.0 Conclusions**

Whilst responsible freedom camping and the need for effective regulation is supported, the inclusion of rural roads in Schedule 1B is too broad-brush, unsupported by site-specific consideration and evidence. Many rural road locations, while technically falling under Schedule 1B, cannot meet the bylaw's requirements, and blanket regulation without verification risks unintended consequences.

Council are urged to undertake greater site specific assessments upon rural roads to ensure the well-considered conditions are achievable in order to adopt a more targeted, evidence-driven, and overall successful approach pursuant to s11 of Freedom Camping Act (FCA) 2011. This process enables and demands thorough assessment, and an accurate identification of what roads can and cannot provide for safe and effective freedom camping.

Kind regards,

IP Solutions Ltd on behalf of Mata Au Investments Ltd

## Proposed QLDC Freedom Camping Bylaw

### Background:

This draft Bylaw will only cover less than 10% of the sites that “freedom camping” is occurring on in Lake Hawea district, and as such, will not achieve its stated aims.

Approximately 90% of “freedom camping” in Lake Hawea district occurs on the Southern Foreshore of Lake Hawea and John Creek Reserves.

For the last 15 years QLDC has managed this area well, alongside the agreement with LINZ to manage the Southern Foreshore and John Creek Reserves general management, including lawn mowing, weed control, tree planting, etc.

Prior to this time, we had ‘freedom campers’ almost every night, with their activities including washing dishes, (and themselves) in the lake close to where the town’s water supply is drawn, clothes lines strung between trees like bunting, their leaving rubbish, and using the local foreshore bush as a toilet (in general, our experience is that campers do not use toilets provided, if they have to walk more than 20 metres)

Now LINZ, who ‘owns’ this land (actually representing the people of NZ) have said that only LINZ can ensure no freedom camping in this area, but they have also stated that there is no budget to do so, and they do not have the staff to carry out this duty.

### Submission:

1. To make a camping bylaw that effectively addresses the problem of “Freedom Camping” in this district, QLDC **must** engage with LINZ over enforcement issues, and come to an **enforcement agreement**, to protect these areas, now that other areas in the district have been made available for ‘freedom camping’ under the proposed new bylaw.
2. All Freedom Camping vehicles in this district must be self-contained.
3. There should be a small charge (e.g., \$5) per van to stay in any of the ‘permitted areas’ overnight, as practiced in overseas countries that have achieved good management of their environment.

Dr Mike Anderson & Diana Turnbull-Anderson  
(Past+) QLDC Freedom Camping Wardens [REDACTED], and [REDACTED] (respectively), for  
Lake Hawea and John Creek areas.

28.07.2025

## Submission to QLDC Draft Freedom Camping Bylaw 2025

Contact names and address

Neal and Alison Brown

RD2, Wanaka 9382

We wish to speak to our submission

### *Introduction*

In any discussion about freedom camping, responsibility for the environment comes first and the right to use it second; the rights of an individual should not override a community's collective wellbeing. Kaitiakitanga or guardianship must always be in play. Currently, exercising guardianship is difficult.

### *Our submission which relates to Lake Hawea*

The edges of Lake Hawea are almost entirely LINZ land on which freedom camping is prohibited but LINZ has no ability or funds to police or prosecute people freedom camping whether in tents or vehicles. This leaves the Southern foreshore of Lake Hawea open to freedom campers.

The reserve at John Creek was established as a Recreation reserve under the 1977 Reserves Act. Is this reserve LINZ land? It is managed and maintained by QLDC but presumably not able to be policed by QLDC.

Prior to the High court ruling, both these areas were patrolled by QLDC Ambassadors and by QLDC-appointed local wardens who were able to ticket people freedom camping.

This draft bylaw does not give QLDC the ability to police the Southern foreshore of Lake Hawea or the John Creek recreation reserve as the Council has no jurisdiction over LINZ land.

Recent signage on the foreshore and at John Creek reserve is totally inadequate. The no camping signs are 15cm by 20cm in size!



## What we recommend

- We urge QLDC to make an **enforcement agreement** with LINZ to support LINZ's mandate to prohibit freedom camping on the Southern foreshore of Lake Hawea and the Reserve at John Creek.
- Reinstate the volunteer wardens to assist Ambassadors 'policing' and educating freedom campers on the Southern foreshore of Lake Hawea and the John Creek reserve. These volunteer wardens live locally so were very aware of infringements.
- We ask the QLDC to redo the signs with wording that clearly states freedom camping is not permitted in these two areas.



Recent signage on the foreshore and at John Creek reserve is totally inadequate. The no camping signs are 15cm by 20cm in size!

The old no camping signs (see below) were excellent; they were 50cm by 30cm in size. This sign could be placed under the name John Creek or replace the very wordy sign which is under the toilet sign.



## What we support

- Restrictions associated with rural roads. These provisions should ensure that the streets of John Creek do not become places where vehicles attempt to freedom camp.  
  
Timaru Creek Road is also restricted but there are several locations where vehicles can drive through long grass to reach the edge of the lake.
- Prohibition of camping around the streets of Lake Hawea. We also recommend that it include the car park at the Community Centre.
- We are ambivalent about the provision of 15 spaces for camping at Camphill Road carpark. It is a well-used carpark for bikers, walkers and users of the white water kayaking facility. However, it may reduce the number of vehicles that attempt to freedom camp on the Southern foreshore or at John Creek reserve. We ask that this site be monitored.

## Submission on QLDC Draft Freedom Camping Bylaw 2025

**Topic:** Selection of Rural Roads to be Restricted Freedom Camping Areas  
**Submitter Name:** Venator Cardrona Terraces Limited Partnership  
**Contact:** Nicole Malpass, IP Solutions Ltd



**Date:** 7<sup>th</sup> August 2025

### 1.0 Overview

The submitter considers the bylaw as currently drafted to be fundamentally flawed and overly broad by its inclusion of many rural roads designated for restricted freedom camping, which cannot comply with said restrictions/criterion for compliance.

This submission focuses specifically on what roads the proposed bylaw seeks to identify as 'Restricted Freedom Camping Areas'.

The Submitter does support QLDC's goal of managing the impacts of freedom camping through legislating a robust bylaw framework and agrees that restrictive conditions applying to freedom camping on rural roads are appropriate in principle. Conditions will play a vital role in protecting the environment, health and safety of people, and the amenity associated with public use of roading networks.

However, this submission strongly urges QLDC to adopt a site-specific, evidence-based approach when identifying rural roads for Restricted Use. Roads that do not meet the criteria should be excluded from the final mapping. A one-size-fits-all road classification ignores site-specific constraints, making it hard for campers to identify compliant locations on roads they presume are suitable. This will complicate enforcement and lead to illegal unsafe camping and conflicts among landowners, road users, and campers.

### 2.0 Support for the Intent and Conditions

The conditions outlined in Clause 8.3, such as maintaining a 5m buffer from the carriageway, using only sealed or gravel pull-offs, limiting stay duration, and prohibiting fire and waste, are justified and reflect sound risk management. It is prudent to restrict freedom camping in rural roadside areas where the combination of narrow shoulders, poor visibility, or environmental sensitivity poses a hazard.

These restrictions, as well as the identification of prohibited areas whereby high-speed roading environments exacerbate safety risks, are all supported.

### **3.0 Key Concerns**

#### **3.1 Broad Inclusionary Approach**

Despite supporting the intent and conditions in principle as they relate to roads within the District, the somewhat blanket identification and mapping of rural roads where by Restrictive Use is proposed to apply, fails to account for the ability for those specific roads to comply (or not comply) with the criterion proposed. Nor the need for further nuances, as recognised by the technical assessment undertaken by Tonkin & Taylor.

*“TT advise that a site-specific assessment would be required to confirm the presence of such hard constraints and whether or not they are located in areas that could reasonably be used for freedom camping”.*

Despite this recognition, the draft bylaw and supporting documentation does not offer site-specific evidence to justify why each of these areas/roads have been deemed appropriate for restricted freedom camping. Instead, the bylaw identifies a vast number of rural roads in the district for restricted freedom camping, regardless of site-specific assessment that determines their appropriateness for such use. This approach is not evidence-based and does not comply with the intent of section 11(2) of the Freedom Camping Act 2011, which requires targeted regulation based on actual need.

#### **3.2 Restrictive Conditions and Site-Specific Assessment of Morris Road**



In order to somewhat partially address this lack of site-specific assessment, this submission puts forward an assessment of one location; Morris Road. See figure 1 below which depicts subject area and surrounds.



**Figure 1:** Aerial image of Morris Road with Proposed Freedom Camping Bylaw 2025 overlay. Yellow indicating restricted road freedom camping area. Source: QLDC GIS.

As noted within the Tonkin & Taylor reporting;

*“Where the speed limit of a road is 70 km/h, the transport SMEs determined a high potential adverse impact on the health and safety of freedom campers and the public. Therefore, a hard constraint is applied to these areas, and freedom camping is not recommended on or immediately beside any high-speed road, in order to protect health and safety.”*

Clause 8.3 of the draft bylaw then imposes the following conditions the areas identified for rural road freedom camping:

- (a) use a certified self-contained motor vehicle;
- (b) ensure that the side of part of the motor vehicle closest to the road (that is the carriageway) is located a minimum of 5m from the nearest edge of the road hard shoulder (where provided) or edge of seal (where no hard shoulder) at all times;
- (c) ensure that the motor vehicle is positioned in a location to ensure any other person can stop their motor vehicle in the immediate area at all times for any other purpose (i.e. other than for freedom camping);
- (d) ensure that the motor vehicle is only positioned on a formed gravel or sealed surface;
- (e) ensure any camping equipment and any other personal items are fully contained within 2m of the motor vehicle at all times, on a side of the vehicle away from the carriageway;
- (f) not stay more than 2 nights within any 30 day period, and not return to any location within 500m of a location where the person has previously freedom camped;
- (g) not leave any waste;
- (h) not light any fires outside of the motor vehicle.

As noted, whilst these restrictions are understood and supported in principle as they will apply to the District, it is not for campers to find a compliant location along Morris Road thereby making Morris Road unsuitable for restricted freedom camping. Specifically, discounting vehicle crossings, there are no locations on public road whereby a motor vehicle could park on a formed gravel or sealed surface which would be a minimum of 5m from the nearest edge of the road hard shoulder or edge of seal.

Of further concern, the Tonkin and Taylor assessment has clearly recommended that freedom camping should not be occurring along high-speed roading environments. In the instance of Morris Road, the speed environment is 80km/h and therefore being subject to this hard constraint as defined, should be specifically identified as prohibited.

The inclusion and identification of such a road, subject to a hard constraint, whereby legal compliance becomes unreasonably difficult/impossible, is confusing and makes responsible camping unnecessarily challenging and confusing (campers will see roads

on mapping/freedom camping information, only to suffer the confusion of 'where' such compliance can occur). This shortfall will facilitate an increased risk of illegal, unsafe, or unmanaged camping.

### **3.3 Contradiction with Responsible Camping Strategy and Tourism Values**

QLDC's own *Responsible Camping Strategy 2022–2027* supports a mix of regulatory and non-regulatory measures to manage camping, emphasising education, infrastructure, and local partnerships. Blanket restrictions across rural roads without site-specific assessment and informed designation are problematic for the following reasons:

- Contradicts the spirit of the strategy;
- Restricts and confuses travellers as to what areas are and are not designated for safe and responsible camping (the map shows one location, but on site assessment/search for compliance, certain roads classified will not offer compliance);
- Last minute failure to find compliance may push campers to less safe or ecologically sensitive sites not currently used;
- Risk increasing illegal or unmanaged camping.

## **4.0 Recommendations:**

1. Restrictive conditions upon rural roads in relation to freedom camping are generally well supported;
2. Undertake site-specific assessment upon designated rural roads, amending locations where appropriate, to ensure compliance is achievable and to avoid confusion. This may involve targeted, site-specific assessments of commonly used or potentially viable rural laybys and pull-offs to:
  - a. Determine which areas meet the bylaw's conditions,
  - b. Identify areas that cannot practically meet those conditions,
  - c. Inform improved signage and education for visitors.
3. Remove Morris Road (and any other road which does not provide an opportunity for compliant freedom camping) from being a rural road identified for restricted

freedom camping given there is no ability to comply with the conditions recommended.

4. Specifically, Morris Road has a speed limit of 80km/h, and being subject to this hard constraint, should be identified as a prohibited area for freedom camping.

## **5.0 Conclusions**

Whilst responsible freedom camping and the need for effective regulation is supported, the inclusion of rural roads in Schedule 1B is too broad-brush, unsupported by site-specific consideration and evidence. Many rural road locations, while technically falling under Schedule 1B, cannot meet the bylaw's requirements, and blanket regulation without verification risks unintended consequences.

Council are urged to undertake greater site specific assessments upon rural roads to ensure the well-considered conditions are achievable in order to adopt a more targeted, evidence-driven, and overall successful approach pursuant to s11 of Freedom Camping Act (FCA) 2011. This process enables and demands thorough assessment, and an accurate identification of what roads can and cannot provide for safe and effective freedom camping.

Kind regards,

IP Solutions Ltd on behalf of Venator Cardrona Terraces Limited Partnership