

Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

Planning Technician

Marlborough District Council
PO Box 43

Blenheim 7240

Email: MEP@marlborough.govt.nz

Ross Withell

President KCSRA

2725 Kenepuru Road

RD 2

Picton 7282

email: president@kcsra.org.nz

WWW: kcsra.org.nz

28 August 2016

Dear Sir/ Madam

Submission on Marlborough Environment Plan (MEP) Freedom Camping

1. I am presenting this submission on the MEP as it refers/ deals with Freedom Camping in my capacity as President of the Kenepuru and Central Sounds Residents' Association (**KCSRA**).

Who are we

2. KCSRA was established in 1991 and currently has over 260 household members whose residents live full-time or part-time in the Kenepuru and Pelorus Sounds. The Association's objects include, among others, to coordinate dealings with central and local government and promote the interests of residents of Kenepuru Sound and adjacent areas, and to promote and act in the best interests of residents, ratepayers and persons associated with the Kenepuru and Central Sounds area.

What do we do

3. KCSRA works hard to represent our members on a range of issues. For example, advocating for better and safer roads and provision of public amenities in places of high visitor use, liaison and representations to the local council and central government, and involvement in local environmental/conservation issues. To see a fuller description of our activities you should visit our web site and look under the "Public Documents" section (www.kcsra.org.nz).

Kenepuru & Central Sounds Residents Association Inc.

President	Ross Withell
Vice President	Andrew Caddie
Secretary	Brenda Sutton
Treasurer	Stefan Schulz
Chairman Roothing Committee	Robin Bowron

president@kcsra.org.nz
vicepresident@kcsra.org.nz
secretary@kcsra.org.nz
treasurer@kcsra.org.nz
roading@kcsra.org.nz

Why are we interested in Freedom Camping

4. As you will be aware KCSRA has put considerable effort into researching and preparing substantive high level submissions on various topics of important policy significance eg a response to the way the MEP proposes to handle Landscape and Natural character issues, and the perceived policy oversights in the handling of Commercial Forestry activities in the Sounds. However, in the course of the KCSRA working group traversing the various volumes of the MEP a variety of various lesser but still important issues were noted, one of these was Freedom Camping.
5. Freedom camping is a vexed issue for many residents in the Marlborough region as well as most other parts of New Zealand as the tourist industry avidly publicises and encourages tourists to explore our country outside the constraints of an organised tour. Self contained camper vans present, on the face of it, a lesser problem as the need/temptation to attend to the likes of normal human bodily functions behind a convenient tree or similar is reduced. However the reality is that there are many camper vans without on board toilet facilities. Then there is the issue of rubbish and the reluctance of local authorities to supply waste disposal facilities in more remote but "popular areas" both in terms of capital expenditure and ongoing maintenance costs.
6. KCSRA has been active in urging Council to provide more public toilet facilities in the Kenepuru and has also over the last two years endeavoured to get more than a "we will look into it" commitment from Council to the installation of a camper dump station in the Upper Kenepuru. These initiatives have been driven by the escalating incident of Freedom Camping in the Kenepuru and Central Sounds region and consequential community concern.
7. Accordingly we were a little surprised at the very brief treatment freedom camping gets in Volumes One and Two of the MEP. A brief mention in Volume One as an example of an activity that the Council can control through other legislation. An equally brief mention in Volume Two - freedom camping being a permitted activity in Open Space 2 and 3 except in an area prohibited by a Council bylaw.
8. With all due respect we **submit** that as there clearly is a linkage between Freedom Camping in terms of the RMA (and thus the MEP) and the Freedom Camping Act 2011 then it is regrettable that Council Planners have failed in Volume One of the MEP to take the opportunity and clearly develop a targeted policy response on this very vexed and increasingly topical issue. Accordingly we reserve our position on this aspect and may make further oral submissions on this aspect once we have had further discussions with Council to gauge the maturity or otherwise of its policy response away from the MEP.
9. In passing we also raise a structural issue with the definition section of the MEP. Far too often where a definition is taken from another piece of legislation rather than repeating the definition the "short cut" drafting technique is to direct the reader to go off and read the definition in the appropriate Act. Such an example being the definition of "Freedom Camping" in the definition section of Volume Two. This is we **submit** not user friendly drafting. We **submit** that the definition section of the MEP should be able to be read as a stand alone section and not present as a game of intellectual "hide and seek". Many readers will not have access to or be used to having to run off to another piece of legislation to then gauge how the particular phrase works in the context of the MEP. This may not be much of an inconvenience for skilled lawyers and planners but we **submit** that all readers should be able to use and read the definitional section of the MEP without

additional and unnecessary hurdles like this one. This change would we **submit** enhance the document's ease of use. We would be pleased to assist with wording to address how any perceived difficulties our suggestion might be thought to raise can be dealt with.

10. KCSRA would like to have the opportunity to appear and be represented at the MEP hearings.

Yours sincerely


Ross Withell

President
Kenepuru and Central Sounds Residents' Association
c/- 2725 Kenepuru Road, RD 2, Picton 7282
Email president@kcsra.org.nz