Marlborough District Council Responsible Camping Review Post Hearings Site Assessments Update

November 2020

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Purpose of Report

The Marlborough District Council Freedom Camping Control Bylaw 2020 was notified on 7 August 2020 (proposed bylaw) for submission with the submission period closing on Monday 7 September 2020.

Hearings were held from Monday the 14 September to Wednesday 16 September 2020. The Council's Hearings Panel consisted of Councillors Oddie and Dawson as co-chairs and Councillors Andrews, Croad, Hope and Sowman as Panel members. The Hearings Panel subsequently deliberated on 18 September, 19 October and 9 November.

A Decision Report records the decisions of the Panel and the reasons for those decisions. Attached to that report is a schedule setting out the decisions and reasons under the Freedom Camping Act as to why sites have been prohibited or restricted.

This 'Post Hearings Site Assessments Update' report has been undertaken as part of the Hearings Panel decision making process for determining the final bylaw to be adopted by the Council. A number of the site assessments have been amended from those initially undertaken by Paul McArthur as part of preparing the report *Marlborough District Council Responsible Camping Review Site Assessments May 2020*. This is as a consequence of information the Hearings Panel received through the submission and hearings process. Some sites in this report were not assessed in the same detailed way for the proposed bylaw.

The Description identifies for each site the extent or area covered in the site assessment. The classification for the site that was notified in the proposed bylaw is also included within the Description.

The site assessment tables use the same criteria as used in the original assessments. The criteria are centred on the requirements of section 11 of the Freedom Camping Act being the only matters for which the Council can either restrict or prohibit freedom camping.

Following the site assessment table an overview of submissions received (if any) on a particular site is provided along with a recommendation as to the outcome for the site. The overview of the submissions is the same as that contained in the schedule of decisions attached to the Decision Report.

For the purpose of this report the following terminology should be noted:

- Current Bylaw means the Marlborough District Council Freedom Camping Control Bylaw 2012 (with 2016 amendments)
- Proposed Bylaw means the version that was publicly notified on 7 August 2020
- Draft Bylaw means the version Council now proposes to come into force on 1 December 2020.

Abbreviations used in this report include

DOC	Department of Conservation
FCA	Freedom Camping Act 2011
CSC	Certified self-contained
NZTA	New Zealand Transport Agency/Waka Kotahi
Review report	Responsible Camping Review for Marlborough District Council – Paul McArthur, May 2020

Summary Table of final classifications for restricted and prohibited sites

Site	Classification	Conditions	Purpose
Blenheim Urban Area	Prohibited	-	• Protect the area • Ensure health and safety • Protect access
	Wynen Street Carpark Restricted	CSC vehicles Up to 2 consecutive nights/4 weeks	• Protect the area • Ensure health and safety • Protect access
Taylor Dam Reserve	Lower Level Prohibited	-	• Protect the area • Ensure health and safety • Protect access
	Upper Level Restricted	CSC vehicles Restriction limited to 10 vehicles Up to 2 consecutive nights/4 weeks	• Protect the area • Ensure health and safety • Protect access
Upper Spring Creek Reserve	Prohibited	-	• Protect the area • Ensure health and safety
Grovetown Lagoon	Prohibited	-	• Protect the area • Protect access
River Reserve on Steam Wharf Road	Prohibited	-	• Protect the area • Protect access
River Reserve on Jones Road	Prohibited	-	• Protect the area • Protect access
Ferry Bridge Picnic Area	Prohibited	-	• Protect the area • Protect access
Wairau Diversion Reserve	Mouth – east end Prohibited	-	• Protect the area • Ensure health and safety • Protect access
	West of prohibited area Restricted	CSC vehicles Up to 2 consecutive nights/4 weeks on no more than 2 occasions	• Protect the area • Ensure health and safety
Rarangi Blue Gum/Millennium Rock Reserve	Prohibited	-	• Protect the area • Protect access

Site	Classification	Conditions	Purpose
Picton Urban Area	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Koromiko Recreation (Collins Memorial) Reserve and Freeths Road	Prohibited	N/A	• Ensure health and safety • Protect access
Port Underwood Road and Tumbledown Bay Road	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Queen Charlotte Drive	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Anakiwa Road Foreshore and Village Green	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Kenepuru Sound Roads	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Double Bay Reserve	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Ohingaroa Bay	Prohibited	N/A	• Protect the area • Protect access
Ohauparuparu Bay	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Havelock Urban Area	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
French Pass Roads	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Alfred Stream Reserve	Prohibited	N/A	• Ensure health and safety • Protect access
Brown River Reserve	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access
Ward Domain	Prohibited	N/A	• Protect the area • Ensure health and safety • Protect access

Site Specific Management

Blenheim Urban Area

Description

Southern Wither Hills Farm Park boundary, to south side of the Co-op Drain to the intersection of Redwood Pass Road and SH 1, from the Riverlands ponds to the stopbank on the north side of the Ōpaoa (Opawa) River to the bridge at Thompson Ford Road, Murphys Road, Middle Renwick Road to Severne Street including Sheps' Park along David Street to Battys Road, the area from Middle Renwick Road, Rose Street and Banksia Place to the Westwood shopping complex, New Renwick Road to Aerodrome Road along the Taylor River through to Taylor Dam Reserve.

The Blenheim Urban Area was identified as a prohibited area for freedom camping through the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No specific risk.
	Natural resource values	Y	Minor risk to stormwater drains if sewerage and greywater from Non-SC vehicles is managed poorly.
	Historical or cultural values	N	No specific risk.
	Landscape and Amenity values	Y	Amenity and landscape values can be adversely affected by presence of campervans, particularly if high numbers, are ongoing, or use spreads beyond vehicles (eg, washing on lines etc.)
	Recreation assets	Y	Likely to be greater pressure on any facilities such as toilets/rubbish bins etc that are provided at a scale for day use.
Protect health and safety	Natural hazards	N	No specific risk although a low risk of flooding for areas along the Taylor River Reserve.
	Built environment hazards	N	No specific risk.
	Human hazards	Y	Providing for camping for campers that are not SC may result in facilities being used in unsafe ways (eg, food preparation/utensil cleaning in toilet handbasins).
Protect access	Physical obstruction of access	Y	Minor risk of physical obstruction of access in locations that may be popular for overnight stays.
	High use discouraging access	Y	Minor risk of high use discouraging access in locations that may be popular for overnight stays.

The primary rationale for prohibiting freedom camping relates to effects on access and visual effects. As Marlborough is the gateway to the South Island by campervans, there is potential for significant use of urban streets and resulting negative impacts.

Some areas within Blenheim were requested to be included as available for freedom camping through the submission process. These included sites at the Stadium 2000 carpark, Pollard Park carpark, Horton Park old netball courts and behind the Railway Station. A commentary on the availability of these sites and their appropriateness for camping is set out below.

Location	Commentary
Behind the Railway Station	Alternatives for camping such as the area behind the Blenheim Railway Station were sought in preference to the Wynen Street carpark as it was considered that site is not particularly pleasing for campers to stay at. Aside from an area immediately adjacent to the Ōpaoa River that is esplanade reserve, the land between the esplanade reserve and the railway station is not owned or in the control of the Council. Therefore this cannot be managed for camping under the Freedom Camping Act 2011.
Horton Park old netball courts	Alternatives for camping such as the Horton Park old netball courts were sought in preference to the Wynen Street carpark as it was considered that site is not particularly pleasing for campers to stay at. The netball court area is being considered for other activities so isn't readily available for a freedom camping site.
Pollard Park carpark	The parking area on the western side of the entranceway into Pollard Park was identified through submission as an appropriate and pleasant area for camping for self-contained vehicles. In terms of the criteria for assessing the appropriateness of the Pollard Park carpark, this would have the same outcome as for the Blenheim Urban Area. There would be greater pressure on recreational assets such as the toilets, parking, BBQs etc that receive a lot of evening use by residents during the summer months. This is a premier park for Marlborough and all areas should remain freely available for users and not specifically for campers.
Stadium 2000 carpark	Alternatives for camping such as the Stadium 2000 carpark were sought in preference to the Wynen Street carpark as it was considered that site is not particularly pleasing for campers to stay at. The carpark does have a more open character than the Wynen Street site and has a small park. However the issue for this site is that there are a number of after-hours users of the carpark and freedom camping vehicles could impact on availability for existing users. If this site is to be considered then discussions with existing users is required. This could be added to the bylaw at a later time.

Recommended

Blenheim Urban Area is confirmed as a prohibited area for freedom camping (except for the Wynen Street Carpark) to protect the health and safety of people who may visit the area and to protect access to the area.

Wynen Street Carpark

Description

Located in central Blenheim on Wynen Street off Symons Street to the east and Market Street to the west.

This carpark area was identified as a restricted area for freedom camping in the proposed bylaw. Restrictions included vehicles needing to be CSC, staying no more than one night in any four week period, parking within the mapped area and vehicles being parked between the hours of 6pm and 9am.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk ?	Risk Management Required (if any)
Protect the area	Conservation values	N	No risk.
	Natural resource values	Y	Minor risk to stormwater systems from waste disposal if used by non-SC campers.
	Historical or cultural values	N	No risk.
	Landscape and Amenity values	N	Visual impacts are consistent with usual carpark use unless campers extend their area of camping by picnic tables, cooking equipment etc.
	Recreation assets	N	No recreation assets at risk.
Protect health and safety	Natural hazards	N	No significant risks provided any allocated carparks away from earthquake prone buildings etc.
	Built environment hazards	N	No significant risks provided any allocated carparks away from buildings etc that may create a fire hazard to campers.
	Human hazards	Y	Hygiene risk from use by non-SC campers without suitable facilities.
Protect access	Physical obstruction of access	N	Use unlikely to prevent access unless this occurs during the day when demand for parking is highest.
	High use discouraging access	N	Use unlikely to discourage access. Campers parking during the day, pay usual day charges.

The site is available for overnight parking by CSC campervans in the current bylaw and few significant issues have been reported. A number of submitters identified that this carpark site was not a pleasant site to stay at and identified other areas that should be considered. These were assessed under the Blenheim Urban Area assessment.

However this carpark area is able to accommodate a significant number of vehicles compared with other freedom camping sites. The site is also centrally located in Blenheim and is no more than a 1-2 minute walk to the north-east from the Taylor River Reserve, providing an extensive area of green space for visitors to enjoy.

Recommended

Wynen Street carpark is confirmed as a restricted area for freedom camping subject to being CSC, staying no more than one night in any four week period and parking within the mapped area. There is no cap on the number of vehicles so long as they remain in the mapped area. Parking of vehicles is restricted to between the hours of 6.00 pm and 9.00 am to provide for normal day time parking.

Taylor Dam Reserve

Description

Taylor Dam Reserve on Taylor Pass Road is located to the south west of Blenheim.

The reserve includes a lower level where there is day use and freedom camping has been prohibited in the proposed bylaw. An upper carpark area has been identified as restricted for freedom camping for 10 vehicles. Vehicles are required to be CSC and may stay for two consecutive nights in any four week period.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Conservation values present that could be impacted by waste from campers that are not SC or use facilities provided.
	Natural resource values	Y	Water quality could also be impacted by waste from campers that are not SC or use facilities provided.
	Historical or cultural values	N	The site has historical values, but these are not likely to be threatened by camping.
	Landscape and Amenity values	Y	The site has specific landscape and amenity values that could be impacted by large numbers of campervans parked in particularly scenic parts of the site.
	Recreation assets	Y	Facilities provided are for day use volumes only.
Protect health and safety	Natural hazards	Y	The lower parts of the site are subject to flood risk. The area is also subject to fire risk.
	Built environment hazards	N	No risks.
	Human hazards	Y	Potential hygiene risk from day facilities being used for wider purposes by Non-SC campers. An upgrade to the existing toilet block is planned.
Protect access	Physical obstruction of access	N	Large area, unlikely to be impacted by physical access being blocked.
	High use discouraging access	Y	If the area were extensively used by campervans this would - at some level of density, be a disincentive for community use.

Use of the wider Taylor Dam area for freedom camping, including the lower level area, has been previously considered by the Council. No provision for camping in the lower level has been provided for to date given the recreation use and purpose of the area and the potential for flooding. The lower level area is also included within the Taylor Dam Recreation Reserve Management Plan but no provision for camping is included within the Plan.

Given the values at the Taylor Dam Reserve lower level, its popularity for day use and natural hazard risk, the current prohibition is considered appropriate. There is also an increasing awareness of the risk levels from fire in the drier eastern rural areas of Marlborough.

Use of the upper level carpark for freedom camping is currently occurring and is considered appropriate subject to the CSC and two day stay restrictions. This area of the reserve is not covered by the Taylor

Dam Recreation Reserve Management Plan. This part of the reserve is a Local Purpose (Soil Conservation and River Control) Reserve having been gazetted for the creation of the Taylor Dam.

Recommended

Taylor Dam Reserve – lower level is confirmed as a prohibited area for freedom camping to protect the area, to protect the health and safety of people who may visit the area and to protect access to the area.

Taylor Dam Reserve – upper level is confirmed as a restricted area for freedom camping subject to vehicles being CSC and staying no more than two consecutive nights in any four week period.

Upper Spring Creek Reserve

Description

Upper Spring Creek Reserve is located on Rapaura Road approximately 400 metres west from the intersection with State Highway 1, at Spring Creek. This reserve was identified as a prohibited area for freedom camping through the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Aquatic and riparian values exist along this margin which may be threatened by camping, particularly non SC vehicles and tents.
	Natural resource values	Y	Non SC camping also has the potential to affect water quality.
	Historical or cultural values	Y	Spring Creek has historical and cultural significance.
	Landscape and Amenity values	Y	Margin is high profile alongside Rapaura Road with visual and scenic appeal reduced by a proliferation of use by campervans.
	Recreation assets	N	No recreation assets at risk.
Protect health and safety	Natural hazards	N	No known hazards. Site is somewhat elevated above the river.
	Built environment hazards	Y	Very close to state highway.
	Human hazards	N	No obvious risks.
Protect access	Physical obstruction of access	N	Not a heavily used area by others.
	High use discouraging access	N	Not a heavily used area by others.

This reserve has been a problem area for campers in the past. It is a narrow strip with little separation from the road and a scenic margin that would be compromised by a proliferation of campervans.

Recommended

Upper Spring Creek Reserve is confirmed as a prohibited area for freedom camping to protect the area and to protect the health and safety of people who may visit the area.

Grovetown Lagoon along Steam Wharf Road

Description

Grovetown Lagoon, an area of restored wetland, is located east of Grovetown along Steam Wharf Road. This area was identified as prohibited for freedom camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Aquatic and riparian values exist along this margin which may be threatened by camping. Significant enhancement works undertaken to improve biodiversity values of the area that may be affected by overnight camping.
	Natural resource values	Y	Water quality may be affected
	Historical or cultural values	Y	Significant cultural values associated with the site that may be affected by overnight camping.
	Landscape and Amenity values	Y	This has landscape or amenity values at risk from a proliferation of camping.
	Recreation assets	N	No obvious risks
Protect health and safety	Natural hazards	N	No obvious risks
	Built environment hazards	N	No obvious risks
	Human hazards	N	No obvious risks
Protect access	Physical obstruction of access	Y	An area that is receiving increased interest and use with enhancement works and walking tracks.
	High use discouraging access	Y	An area that is receiving increased interest and use with enhancement works and walking tracks.

A significant restoration project has been underway at the Grovetown Lagoon for a number of years. The site was identified as prohibited in the proposed bylaw to protect the natural habitat and reduce the potential for disturbance that could result from overnight camping. The restoration project has also seen increased public use of the site with walking routes around the Lagoon. The area is also of cultural significance for local iwi.

Recommended

Grovetown Lagoon along Steam Wharf Road is confirmed as a prohibited area for freedom camping to protect the area and to protect access to the area.

River Reserve on Steam Wharf Road

Description

The River Reserve on Steam Wharf Road is located adjacent to the Wairau Rowing Club premises in alongside the Wairau River near Grovetown. This area was identified as a prohibited area for freedom camping through the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Aquatic and riparian values along this margin which may be threatened by camping, particularly non SC.
	Natural resource values	Y	Non SC camping also has the potential to affect water quality.
	Historical or cultural values	Y	The Wairau River in general terms has historical and cultural significance.
	Landscape and Amenity values	N	No significant landscape or amenity values at risk from camping.
	Recreation assets	N	No recreation assets at risk.
Protect health and safety	Natural hazards	Y	Potential for flood risk.
	Built environment hazards	N	No obvious risks.
	Human hazards	N	No obvious risks.
Protect access	Physical obstruction of access	Y	This is a popular day use area with access issues being experienced in the past.
	High use discouraging access	Y	A proliferation of use by campervans would discourage wider use by the community.

This reserve has been a problem area for campers in the past particularly due to congestion and access issues and environmental effects. Without a prohibition in place this area would continue to be compromised by a proliferation of campervans.

Recommended

River Reserve on Steam Wharf Road is confirmed as a prohibited area for freedom camping to protect the area and to protect access to the area.

River Reserve on Jones Road

Description

The River Reserve on Jones Road is located adjacent to the Blenheim Rowing Club premises on Jones Road in Grovetown. This area was identified as a prohibited area for freedom camping through the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	Remnant lowland forest and some aquatic and riparian values along this margin although limited risk of damage by camping.
	Natural resource values	N	Minor risk of Non SC camping affecting water quality.
	Historical or cultural values	Y	The Wairau River in general terms has historical and cultural significance.
	Landscape and Amenity values	N	No significant landscape or amenity values at risk from camping.
	Recreation assets	N	No recreation assets at risk.
Protect health and safety	Natural hazards	Y	Potential for flood risk.
	Built environment hazards	N	No obvious risks.
	Human hazards	N	No obvious risks.
Protect access	Physical obstruction of access	Y	This is a popular day use area with access issues being experienced in the past.
	High use discouraging access	Y	A proliferation of use by campervans would discourage wider use by the community.

This reserve has been a problem area for campers in the past particularly due to congestion and access issues and environmental effects. Without a prohibition in place this area would continue to be compromised by a proliferation of campervans.

Recommended

River Reserve on Jones Road is confirmed as a prohibited area for responsible camping to protect the area and to protect access to the area.

Ferry Bridge Picnic Area

Description

The Ferry Bridge Picnic Area is located on the east side of the Wairau River extending from the Ferry Bridge to the south east along Wairau Bar Road. This area was identified as a prohibited area for freedom camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Aquatic and riparian values along this margin which may be threatened by camping, particularly non SC.
	Natural resource values	Y	Non SC camping also has the potential to affect water quality.
	Historical or cultural values	Y	The Wairau River in general terms has historical and cultural significance.
	Landscape and Amenity values	Y	This picnic area has landscape or amenity values at risk from a proliferation of camping.
	Recreation assets	N	No recreation assets at risk.
Protect health and safety	Natural hazards	Y	Potential for flood risk.
	Built environment hazards	N	No obvious risks.
	Human hazards	N	No obvious risks.
Protect access	Physical obstruction of access	Y	This is a popular day use area with access issues being experienced in the past.
	High use discouraging access	Y	A proliferation of use by campervans would discourage wider use by the community.

This reserve has been a problem area for campers in the past particularly due to congestion and access issues and environmental effects. Without a prohibition in place this area would continue to be compromised by a proliferation of campervans. Work is underway to develop the picnic area as a day use area for wider public use through the Council's Small Townships Programme.

Recommended

Ferry Bridge Picnic Area is confirmed as a prohibited area for freedom camping to protect the area and to protect access to the area.

Wairau Diversion

Description

The Wairau Diversion area is located on the northern side of the lower reach of the Diversion. It is accessed from the intersection of Thomas Road and Neal Road.

The area of the Wairau Diversion at the eastern end of the site by the Diversion mouth was identified as a prohibited area for freedom camping in the proposed bylaw. The remaining area to the west of this is a restricted area in the proposed bylaw. Restrictions include vehicles being required to be CSC and stay for no more than two consecutive nights in any four week period.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	The area is an important for whitebaiting and fishing however these values are unlikely to be threatened by camping.
	Natural resource values	N	Some risk of effect on water quality from camping that is not self-contained or have access to toilet and other waste facilities.
	Historical or cultural values	N	No known values at threat.
	Landscape and Amenity values	Y	Modified landscape with no threat to values. Amenity for some using the area has been affected.
	Recreation assets	N	Current day use toilet facilities are getting significant additional use from nearby campers (despite requirement to be CSC).
Protect health and safety	Natural hazards	N	Flood risk on lower terraces.
	Built environment hazards	N	No known risks.
	Human hazards	Y	Potential hygiene risk from day facilities being used for wider purposes by non-CSC campers.
Protect access	Physical obstruction of access	Y/N	Large area so obstruction of access unlikely apart from the end of the site which is particularly popular for day use.
	High use discouraging access	Y/N	When large numbers of campers are present and peak the site is less appealing for community use.

Despite being a large area, the site has experienced high levels of use and suffered from environmental damage from non-CSC camping.

There was a mix of views about the use of the Wairau Diversion for responsible camping. Some submitters were concerned at the approach of closing Koromiko and concentrating more campers at the Diversion. Fire risk, conflict with recreational users, health and safety concerns, a lack of adequate provision for toilets and rubbish and access into the site were identified as issues.

Other submitters considered this site to be appropriate for freedom camping, noting its location away from urban areas.

The current split between prohibited at the eastern end of the site and restricted elsewhere is considered appropriate given the day use popularity of this area. Better landscaping and definition of areas for

responsible campers and for day users is proposed. Additionally it is proposed to reduce the restricted area for camping to enable other activities toward the western end of the site.

Recommended

The Wairau Diversion Mouth area is a prohibited area for responsible camping to protect the area, to protect the health and safety of people who may visit the area and to protect access to the area.

The Wairau Diversion area west of the prohibited area is a restricted area for freedom camping subject to restrictions notified in the proposed bylaw.

Rarangi Blue Gum/Millennium Rock Road Reserve

Description

The Rarangi Blue Gum/Millennium Rock Road Reserve is located at the intersection of Rarangi Road and Rarangi Beach Road and adjoins the Department of Conservation (DOC) Rarangi Recreation Reserve. This area was identified as a prohibited area for freedom camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Conservation land is adjacent to this site; however, values are unlikely to be threatened by camping activity. The adjacent DOC reserve is a prohibited area under the FCA due to the presence of the endangered *Kiwaia moth.* There is a value in a prohibition of this area to ensure consistency of rules.
	Natural resource values	N	Unlikely to be any impact in this area.
	Historical or cultural values	N	No known values at risk.
	Landscape and Amenity values	N	Visual site, with the presence of campers likely to irritate some passing traffic but no significant actual effect.
	Recreation assets	N	No recreation assets at risk.
Protect health and safety	Natural hazards	N	No known risks.
	Built environment hazards	N	No known risks.
	Human hazards	N	No obvious risk.
Protect access	Physical obstruction of access	Y	Site has been used from time to time for stockpiling roading supplies. Proposed enhancement of area planned through the Council's Small Townships Programme (STP).
	High use discouraging access	N	Low public use area but may increase with STP enhancements.

While this site may have been a problem area previously, this is likely to have been generated by perceived impacts by community members passing rather than any actual effect. DOC has confirmed that a prohibition is useful to ensure protection of the adjacent conservation land. Enhancement plans proposed through the Council's Small Townships Programme for this area would not be compatible with use by freedom camping.

Recommended

Rarangi Blue Gum/Millennium Rock Road Reserve is confirmed as a prohibited area for responsible camping to protect the area and to protect access to the area.

Picton Urban Area

Description

The Picton Urban Area encompasses the Elevation, Wairau Road, Essons Valley, following the bush line through Waikawa Bay and Victoria Domain through to Shelly Beach, Picton Foreshore through to the Picton Cemetery at Gravesend Place and back to Wairau Road.

Aside from sites at 44 High Street carpark and Memorial Park, the remainder of the Picton Urban Area was identified as a prohibited area for freedom camping in the proposed bylaw. The two identified sites were proposed as restricted sites for 10 CSC vehicles, staying no more than two nights in any four week period, parking within the mapped area and vehicles are only able to be parked between the hours of 6.00 pm and 9.00 am.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Potential risk to the Victoria Domain from fire/waste.
	Natural resource values	Y	Minor risk to stormwater drains etc depending on how sewerage and greywater from Non-SC vehicles is managed.
	Historical or cultural values	N	No known values at risk.
	Landscape and Amenity values	Y	Amenity and landscape values can be adversely affected by presence of campervans, particularly if high numbers, is ongoing or spreads beyond vehicles (eg, washing on lines, tables/chairs etc.)
	Recreation assets	N	Likely to be greater pressure on any facilities such as toilets/rubbish bins etc that are provided at a scale for day use only.
Protect health and safety	Natural hazards	Y	Fire hazard a risk for areas such as Victoria Domain Reserves.
	Built environment hazards	N	No specific risk.
	Human hazards	Y	Providing for camping for campers that are not SC may result in facilities being used in unsafe ways (eg, food preparation/utensil cleaning in toilet handbasins).
Protect access	Physical obstruction of access	Y	Minor risk of physical obstruction of access in locations that may be popular for overnight stays.
	High use discouraging access	Y	Minor risk of high use discouraging access in locations that may be popular for overnight stays (eg, Victoria Domain carpark, Picton foreshore).

The primary rationale for prohibiting responsible camping related to effects on access and visual effects. As Picton is the primary gateway to the South Island by campervans, there has been significant use of urban streets for freedom camping and resulting negative impacts, particularly where vehicles have not been CSC.

Through the draft bylaw two areas for responsible camping were identified at the carpark at 44 High Street and at Memorial Park. However, after the submission and hearing process these sites were excluded as they were considered not to satisfy the requirements of the FCA for the reasons set out in the above assessment and as follows.

Location	Commentary
Carpark at 44 High Street	The site proposed at 44 High Street was opposed by adjacent landowners who had experienced issues with freedom campers at this location previously when it had been used on a trial basis. Issues with noise and behaviour of campers were of particular concern so a loss of amenity values in addition to the issues identified above would be apparent with campers at this site.
Memorial Park	For Memorial Park, the proximity of the site to the emergency centre facility was of concern to many as was the loss of area for boat trailer parking on the reserve, the impact on the amenity of the Park and to nearby marina activities.

Recommended

Picton Urban Area, including the two sites included in the proposed bylaw at 44 High Street (carpark) and at Memorial Park is confirmed as a prohibited area for freedom camping to protect the area, to protect the health and safety of people who may visit the area and to protect access to the area.

Koromiko Recreation (Collins Memorial) Reserve and Freeths Road, Koromiko

Description

The Koromiko Recreation (Collins Memorial) Reserve is located adjacent to State Highway 1 and Freeths Road in Koromiko.

The reserve was identified as a prohibited area for freedom camping in the proposed bylaw. Freeths Road was also identified as a prohibited area for freedom camping.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Significant conservation values in adjacent QEII National Trust area. Little threat from camping.
	Natural resource values	N	No obvious risks.
	Historical or cultural values	Y	Strong opposition from Te Atiawa.
	Landscape and Amenity values	Y	Potential for visual litter etc.
	Recreation assets	N	No significant risk to recreation assets but popularity of the site can limit parking for day use or access to public toilets.
Protect health and safety	Natural hazards	N	No obvious risks.
	Built environment hazards	Y	Site is located adjacent to 100 km/h State Highway 1. Some risk exists for vehicles arriving and leaving the site.
	Human hazards	N	An adequate range of facilities for overnight use.
Protect access	Physical obstruction of access	Y	Site has been used previously as a rest area/short stop reserve. The demands on the site means campervans arrive early in the day restricting day use.
	High use discouraging access	Y	Site is less appealing for short stop day use.

In previous years there have been significant issues in this reserve and along Freeths Road however, these have been reduced through tighter bylaw conditions and active enforcement patrols. Notwithstanding the reduction in issues at this site, with the Wairau Diversion being the preferred fatigue stop for travellers and a desire to return this reserve to a day use purpose, it was proposed to become a prohibited area for responsible camping. A continued prohibition for responsible on Freeths Road is also considered appropriate.

Recommended

Koromiko Recreation (Collins Memorial) Reserve and Freeths Road, Koromiko are confirmed as prohibited areas for freedom camping to protect health and safety of people who may visit the areas and to protect access to the areas.

Port Underwood Road and Tumbledown Bay Road

Description

Port Underwood Road runs from Waikawa to Rarangi and Tumbledown Bay Road runs around the head of Port Underwood and down its eastern shore. Freedom camping was prohibited in the proposed bylaw along the whole of Port Underwood Road. The district-wide restriction enabling freedom camping in CSC vehicles for a stay of two nights in any four week period applied to Tumbledown Bay Road in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	Significant conservation values exist in places along the road, but these are unlikely to be threatened by overnight parking. (Some DOC prohibited areas exist at Hakahaka Bay and Tom Canes Bay).
	Natural resource values	N	Low risk of inappropriate effluent and waste disposal affecting stream or coastal water quality.
	Historical or cultural values	Y	There are cultural values associated with many areas of the Marlborough Sounds. Some concern with graves located in areas where camping has occurred.
	Landscape and Amenity values	Y	Some likely effect on landscape and amenity values from a proliferation of campervans staying overnight along this road.
	Recreation assets	N	No risk to recreation assets.
Protect health and safety	Natural hazards	N	Some parts of the road can be subject to slips but insignificant risk.
	Built environment hazards	Y	This is a significant issue – the majority of these roads are narrow, winding, have poor visibility and few parking places.
	Human hazards	Y	Most of the few public facilities along route are designed for day users only, hence excessive use may create hygiene risk.
Protect access	Physical obstruction of access	Y	As there are few places to park, at times parking may involve blocking an entranceway or driveway.
	High use discouraging access	Y	Some effects highlighted by day users unable to access some areas because of camping.

A significant rationale for prohibiting freedom camping on the Port Underwood Road related to safety issues associated with a narrow winding road with poor visibility and few turning places or parking areas. There are almost no facilities and those that do exist are designed for day use and day use volumes. It is appropriate that the prohibited classification continues in the draft bylaw given these issues.

Tumbledown Bay Road has the same features as the Port Underwood Road although pressure by campers has been lower. This was a consideration in why the Road was not included as a prohibited area for camping in the proposed bylaw. However in response to submitters requesting a total prohibition of camping on all Port Underwood roads, including Tumbledown Bay Road, this road has been added to the bylaw. Protecting health and safety of visitors is a major factor as is a need to protect access to the area. This latter aspect was highlighted by submitters who considered access had been restricted for day use in a number of areas along Tumbledown Bay Road.

Recommended

Port Underwood Road and Tumbledown Bay Road be confirmed as prohibited areas for freedom camping to protect the area, to protect the health and safety of people who may visit the areas and to protect access to the area.

Queen Charlotte Drive

Description

Queen Charlotte Drive includes all areas of the road between State Highway 6 at Havelock to the Picton Urban Area including all formed road, road reserve, road verges and the Queen Charlotte Drive Lookout. This area was identified as a prohibited area for freedom camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	Significant conservation values exist in places along the road, but these are unlikely to be threatened by overnight parking.
	Natural resource values	N	Low chance of inappropriate effluent and waste disposal affecting stream or coastal water quality.
	Historical or cultural values	N	There are cultural values associated with many areas of the Marlborough Sounds but no obvious values at risk.
	Landscape and Amenity values	Y	Some likely effect on landscape and amenity values from a proliferation of campervans staying overnight along this road.
	Recreation assets	N	No risk to recreation assets.
Protect health and safety	Natural hazards	N	Some parts of the road can be subject to slips but insignificant risk.
	Built environment hazards	Y	This is a significant issue – the majority of this road is narrow, winding, has poor visibility and few parking places.
	Human hazards	Y	Any public facilities along route are designed for day user only hence excessive use may create hygiene risk.
Protect access	Physical obstruction of access	Y	As there are few places to park, at times parking may involve blocking an entranceway or driveway.
	High use discouraging access	Y	Some areas along this route do have high use and camping may affect this use.

The primary rationale for prohibiting freedom camping on this road relates to safety issues associated with a narrow winding road with poor visibility, few turning places or parking areas. There are also few facilities and those that do exist are designed for day use and day use volumes. However, the Marlborough Sounds environment in which this road is located is a sensitive area with many cultural, natural and landscape values. Collectively the area is considered of such significance that any camping should occur within areas where there are facilities to service the needs of campers.

Recommended

Queen Charlotte Drive is confirmed as a prohibited area for responsible camping to protect the area, to protect the health and safety of people who may visit the areas and to protect access to the area.

Anakiwa Road and Village Green

Description

Anakiwa Road and Village Green includes all formed road, road reserve and road verges from the turn off at Queen Charlotte Drive through to the start of the Queen Charlotte Track. Part of the area known as the Village Green was identified as a restricted area for freedom camping in the proposed bylaw for 6 CSC vehicles parked in marked spaces and able to stay for two consecutive nights in a four week period. The rest of Anakiwa Road was prohibited for responsible camping.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No known conservation values at risk.
	Natural resource values	N	Low chance of inappropriate effluent and waste disposal affecting stream or coastal water quality.
	Historical or cultural values	N	There are cultural values associated with many areas of the Marlborough Sounds but no obvious values at risk.
	Landscape and Amenity values	Y	Some likely effect on landscape and amenity values from a proliferation of campervans staying overnight along this road.
	Recreation assets	N	No risk to recreation assets.
Protect health and safety	Natural hazards	N	Low risk in some areas from flooding/storm surge.
	Built environment hazards	Y	Some risk with parking of vehicles on the Anakiwa Road which is narrow in parts.
	Human hazards	Y	Public facilities at Anakiwa are designed for day user only, hence excessive/inappropriate use by people staying overnight in non-SC vehicles may create hygiene risk.
Protect access	Physical obstruction of access	Y	Some risk of physical obstruction and competing with users for the Queen Charlotte Walkway and to the remainder of the Village Green area.
	High use discouraging access	Y	A proliferation of campervans parking overnight may discourage use.

The proliferation of camping along the Anakiwa Road would have an adverse effect on day use access to the coastal environment hence a prohibition is considered justifiable. Some health and safety concerns were identified by submitters with parts of the road being too narrow for campervans to park safely.

While use of the Village Green site for responsible camping site has appeared to work, it does limit the available space for day use. In addition, as the other two Marlborough Sounds based responsible camping sites are proposed to be closed the likely pressure that would be placed on the Village Green site would not be sustainable. Given this and the increased community use of this area, this Village Green site is to be become prohibited for responsible camping.

Recommended

Anakiwa Road is confirmed as a prohibited area for freedom camping to protect the health and safety of people who may visit the areas and to protect access to the area.

The Village Green is confirmed as a prohibited area for freedom camping to protect the area and to protect access to the area.

Kenepuru Sound Roads

Description

This grouping includes all roads servicing Kenepuru Sound north from Linkwater. These roads were identified as a prohibited area for freedom camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Significant conservation values exist in places along the roads and these may be threatened by overnight parking.
	Natural resource values	Y	Small chance of inappropriate effluent and waste disposal affecting stream or coastal water quality.
	Historical or cultural values	N	There are cultural values associated with many areas of the Marlborough Sounds but no obvious values at risk.
	Landscape and Amenity values	Y	Some likely effect on landscape and amenity values from a proliferation of campervans staying overnight along these roads.
	Recreation assets	N	No risk to recreation assets.
Protect health and safety	Natural hazards	N	Some parts of the road can be subject to slips but insignificant risk.
	Built environment hazards	Y	This is a significant issue – the majority of these roads are narrow, winding, have poor visibility and there are few parking places.
	Human hazards	Y	Any public facilities along route are designed for day user only hence excessive/inappropriate use by people staying overnight may create hygiene risk.
Protect access to the area	Physical obstruction of access	Y	As there are few places to park, at times parking may involve blocking an entranceway or driveway.
	High use discouraging access	N	No negative effect.

The Marlborough Sounds environment in which these roads are located is a sensitive area with many cultural, natural and landscape values. Collectively the area is considered of such significance that any camping should occur within areas where there are facilities in place to service the needs of campers.

A significant reason for prohibiting responsible camping on these roads relates to safety issues associated with a narrow winding road with poor visibility, few turning places or parking areas. There are also few facilities and those that do exist are designed for day use and day use volumes. Prohibiting responsible camping for only part of this road will result in an exacerbation of activity and impact on any remaining sections of road.

Recommended

Kenepuru Sound Roads are confirmed as a prohibited area for responsible camping to protect the area, to protect the health and safety of people who may visit the area and to protect access.

Double Bay Reserve, Kenepuru Road

Description

Double Bay is a small coastal recreation reserve accessed via a driveway from Moetapu Bay Road. The site was identified in the proposed bylaw as a restricted area for freedom camping for 6 vehicles parked in marked spaces and able to stay for two consecutive nights in a four week period.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No significant conservation values at risk from this activity although a significant wetland included in the MEP is located just to the west of the camping site.
	Natural resource values	N	No risk to natural resource values from use by CSC vehicles.
	Historical or cultural values	N	There are cultural values associated with many areas of the Marlborough Sounds but no obvious values at risk.
	Landscape and Amenity values	Y	An adverse effect on amenity values experienced by local residents from camping at this site.
	Recreation assets	N	No obvious values at risk although some reported misuse of the public toilet on the reserve.
Protect health and safety	Natural hazards	N	Rare flood/storm surge risk.
	Built environment hazards	Y	Some issues have been identified with campers finding access from Moetapu Road to the site difficult, especially at night.
	Human hazards	Y	Inappropriate use by people staying overnight in non-SC vehicles may create hygiene risk.
Protect access	Physical obstruction of access	Y	Some risk of physical obstruction however this is contained through defined number and location limits.
	High use discouraging access	Y	Additional use of reserve has been a disincentive for some day visitors.

In considering the future of the Anakiwa Village Green, Double Bay and Ohingaroa Bay sites the Hearings Panel was mindful of the likely impact of closing one or two of them on the remaining site(s) in this grouping. The Panel's approach was that either none of the sites would be closed or all of them would be closed.

Concerns highlighted by those opposing freedom camping at this site included health and safety issues, intimidation of locals, noise, original day use purpose lost, danger on roads leading to the site, water quality and availability and rubbish. The use of the site for freedom camping purpose does limit the available space for day use, which has had a negative effect on local residents and other users of the reserve. Given this and the other reported amenity related issues the site is to become prohibited for freedom camping.

Recommended

Double Bay is confirmed as a prohibited area for freedom camping to protect the area, to protect the health and safety of people who may visit the area and to protect access.

Ohingaroa Bay, Kenepuru Road

Description

Ohingaroa Bay is a local purpose (esplanade) reserve located immediately adjacent to the Kenepuru Road approximately 7km from Linkwater. The site was identified in the proposed bylaw as a restricted area for freedom camping for 4 vehicles parked in marked spaces and able to stay for two consecutive nights in a four week period.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No significant conservation values at risk from this activity.
	Natural resource values	N	No risk to natural resource values from use by SC vehicles.
	Historical or cultural values	N	There are cultural values associated with many areas of the Marlborough Sounds but no obvious values at risk.
	Landscape and Amenity values	Y	Current freedom camping site highly visible from the few nearby houses in the area and passing traffic. Some consider there has been an adverse impact on amenity values.
	Recreation assets	N	No recreation assets at risk from this activity, although there has been reported misuse of the toilet facility on the reserve.
Protect health and safety	Natural hazards	N	No obvious risks.
	Built environment hazards	N	No risks.
	Human hazards	Y	No human hygiene risks from SC vehicles with suitable facilities. Inappropriate use by people staying overnight in non-SC vehicles may create hygiene risk.
Protect access	Physical obstruction of access	Y	Possible given relatively small area.
	High use discouraging access	Y	Also possible given relatively small area.

In considering the future of the Anakiwa Village Green, Double Bay and Ohingaroa Bay sites the Hearings Panel was mindful of the likely impact of closing one or two of them on the remaining site(s) in this grouping. The Panel's approach was that either none of the sites would be closed or all of them would be closed.

Concerns highlighted by those opposing freedom camping ay Ohingaroa included health and safety issues, intimidation of locals, noise, original day use purpose lost and rubbish. It was noted that there had been a reported loss of enjoyment by local residents and visitors experienced at this site and that with only four available spaces for vehicles, if the site were to be closed this would not result in a significant loss for freedom campers. (There are a number of Department of Conservation campsites in the area providing a similar camping option[1].) This decision allows the Bay to return to day use purposes.

[1] This was not taken into account in the Hearing Panel's decision making.

Recommended

Ohingaroa Bay is confirmed as a prohibited area for freedom camping to protect the area and to protect access to the area.

Ohauparuparu Bay, Kenepuru Sound

Description

Located on the western site of Kenepuru Head, Ohauparuparu Bay is 47km and over a one-hour drive from Linkwater. The area is a mixture of Sounds Foreshore Reserve, private land and unformed legal road. This area was identified as prohibited for responsible camping in the proposed bylaw.

The Ohauparuparu Bay site is located on land that is a mixture of Sounds Foreshore Reserve, private ownership and an unformed legal road with the site being predominantly in private ownership. As the land is not all under the control or management of the Council, the Council cannot legally control freedom camping on the areas of private land or Sounds Foreshore Reserve – see Section 3 of the FCA.

The remainder of the roads in this location are grouped in the Kenepuru Sound Roads area. Responsible camping is prohibited in this area and this prohibition is appropriate.

Recommended

Ohauparuparu Bay is confirmed as a prohibited area for responsible camping.

Havelock Urban Area

Description

The Havelock Urban Area encompasses the area south of Mahakipawa Road across the estuary to the Marina through to Cook Street then to the intersection with State Highway 6, then following the bush line back to Mahakipawa Road and State Highway 6. This area was identified as prohibited for freedom camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No specific risk.
	Natural resource values	Y	Minor risk to stormwater drains etc depending on how sewerage and greywater from Non SC vehicles is managed.
	Historical or cultural values	N	No specific risk.
	Landscape and Amenity values	Y	Amenity and landscape values can be adversely affected by presence of campervans, particularly if high numbers, are ongoing or spreads beyond vehicles (eg, washing on lines, tables/chairs etc.).
	Recreation assets	N	Likely to be greater pressure on any facilities such as toilets/rubbish bins etc that are provided at a scale for day use.
Protect health and safety	Natural hazards	N	No specific risk.
	Built environment hazards	N	No specific risk.
	Human hazards	Y	Providing for camping for campers that are not SC may result in facilities being used in unsafe ways (eg, food preparation/utensil cleaning in toilet handbasins).
Protect access	Physical obstruction of access	Y	Minor risk of physical obstruction of access in locations that may be popular for overnight stays.
	High use discouraging access	Y	Minor risk of high use discouraging access in locations that may be popular for overnight stays.

The primary rationale for prohibiting freedom camping relates to effects on access and visual effects. As Havelock is on the main road towards Nelson, there has been significant use of urban streets and resulting negative impacts.

Recommended

Havelock Urban Area is confirmed as a prohibited area for responsible camping to protect the area, to protect the health and safety of people who may visit the area and to protect access.

French Pass Roads

Description

From State Highway 6 to Ronga Road, Croisilles Road including Okiwi Bay Township, Tunnicliffe Reserve, Croisilles French Pass Road encompassing the French Pass Township, Te Towaka-Port Ligar, Elaine Bay and Bulwer Roads. This area was identified as prohibited for responsible camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
To Protect the area	Conservation values	N	Significant conservation values exist in places along the road, but these are unlikely to be threatened by overnight parking.
	Natural resource values	Y	Small chance of inappropriate effluent and waste disposal affecting stream or coastal water quality.
	Historical or cultural values	N	There are cultural values associated with many areas of the Marlborough Sounds but no obvious values at risk.
	Landscape and Amenity values	Y	Some likely effect on landscape and amenity values from a proliferation of campervans staying overnight along this road.
	Recreation assets	N	No risk to recreation assets.
To protect the health and safety of visitors	Natural hazards	N	Some parts of the road can be subject to slips but insignificant risk.
	Built environment hazards	Y	This is a significant issue – the majority of this road is narrow, winding, has poor visibility and few parking places.
	Human hazards	Y	Any public facilities along route are designed for day user only hence excessive/inappropriate use by people staying overnight may create hygiene risk.
To protect access to the area	Physical obstruction of access	Y	As there are few places to park, at times parking may involve blocking an entranceway or driveway.
	High use discouraging access	N	No negative effect.

The primary rationale for prohibiting freedom camping on these roads relates to safety issues associated with narrow winding roads with poor visibility, few turning places or parking areas. There are also few facilities and those that do exist are designed for day use and day use volumes. Prohibiting freedom camping for only part of these roads will result in an exacerbation of activity and impact on any remaining sections of road.

The Marlborough Sounds environment in which these roads are located is a sensitive area with many cultural, natural and landscape values. Collectively the area is considered of such significance that any camping should occur within areas where there are facilities in place to service the needs of campers.

Recommended

The French Pass Roads be confirmed as a prohibited area for responsible camping to protect the area, to protect the health and safety of people who may visit the area and to protect access.

Alfred Stream Reserve, Rai Valley

Description

Alfred Stream is a small local purpose reserve for a picnic area at the southern entrance to the Rai Valley Township. This site was identified in the proposed bylaw as a restricted area for CSC vehicles able to stay no more than two consecutive nights in any four week period.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	Low risk of impact on aquatic values.
	Natural resource values	N	Low risk of impact on water quality.
	Historical or cultural values	N	No values communicated at risk.
	Landscape and Amenity values	N	Potential for minor visual effect from highway and litter etc.
	Recreation assets	N	No significant risk to recreation assets.
Protect health and safety	Natural hazards	Y	The area is prone to periodic flooding but considered a lower risk than the Brown River site. No formalised flood warning system in place.
	Built environment hazards	N	No obvious risk.
	Human hazards	N	Low risk of health issues arising from poor greywater or ablution hygiene from non-SC use.
Protect access	Physical obstruction of access	Y	Access restricted for day users with the presence of campers.
	High use discouraging access	Y	Community use has been discouraged at the site because of camping activity.

The flood risk at the site and the speed with which flooding can occur means managing overnighting campers can be difficult. The costs and practicality of implementing flood protection works or a more formalised flood warning system for this site are not warranted, given the size of the site and its location.

The purpose of this reserve is Local Purpose (picnic area). The use of the reserve for responsible camping has seen a detrimental effect on day use and therefore the primary purpose of the reserve. The site is still suitable for day use by the community and visitors and this was evident through submissions received.

Recommended

Alfred Stream Reserve is confirmed as a prohibited area for responsible camping to protect access to the area and to protect the health and safety of people who may visit the area.

Brown River, Rai Valley

Description

The Brown River site is a small attractive area close to the French Pass Road turn-off. The area is a mix of river and road reserve. This area was identified as a prohibited area for freedom camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	Low potential impact on aquatic values (toilet but no greywater disposal).
	Natural resource values	N	Potential impact on water quality (toilet but no greywater disposal) but minor relative to other catchment impacts.
	Historical or cultural values	N	No values communicated at risk.
	Landscape and Amenity values	N	Potential for minor visual effect from highway and litter etc.
	Recreation assets	N	No significant risk to recreation assets.
Protect health and safety	Natural hazards	Y	Flood risk.
	Built environment hazards	N	No obvious risk.
	Human hazards	Y	Overcrowding has occurred at this site over the summer, with additional vehicles clogging up site at times. Low risk of health issues arising from poor greywater or ablution hygiene from non-SC use.
Protect access	Physical obstruction of access	Y	Previously popular site for day use by local community. During the day access still possible.
	High use discouraging access	Y	Despite physical access still possible, site is significantly less appealing for community use. Landscaping changes detracts for community use.

The flood risk at the site and the speed with which flooding can occur means managing overnighting campers can be difficult. The costs and practicality of implementing flood protection works or a more formalised flood warning system for this site are not warranted, given the size of the site and its location.

The site is still suitable for day use by the community and visitors and this was evident through submissions received.

Recommended

Brown River is confirmed as a prohibited area for responsible camping to protect access to the area and to protect the health and safety of people who may visit the area.

Penzance Bay Township

Description

Penzance Bay is located off Archers Road in Tennyson Inlet, Pelorus Sound/Te Hoiere. The Penzance Bay Township area encompasses Archers Road through to Kamahi Road, including Worlds End Road. This area was identified as a prohibited area for responsible camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No specific risk.
	Natural resource values	N	No specific risk.
	Historical or cultural values	N	There are cultural values associated with many areas of the Marlborough Sounds but no obvious values at risk.
	Landscape and Amenity values	Y	Amenity and landscape values can be adversely affected by presence of campervans, particularly if high numbers, are ongoing, or use spreads beyond vehicles (eg, washing on lines etc.)
	Recreation assets	Y	Likely to be greater pressure on any facilities such as toilets/rubbish bins etc that are provided at a scale for day use.
Protect health and safety	Natural hazards	N	No specific risk.
	Built environment hazards	N	No specific risk.
	Human hazards	Y	Providing for camping for campers that are not SC may result in facilities being used in unsafe ways (eg, food preparation/utensil cleaning in toilet handbasins).
Protect access	Physical obstruction of access	Y	Minor risk of physical obstruction of access to properties and public areas.
	High use discouraging access	N	Use would be unlikely to discourage members of the community using public spaces.

This area was a problem area for a number of years, however with the addition of this area as a prohibited area for responsible camping most of these issues have been resolved.

The Marlborough Sounds environment in which this area is located is a sensitive area with many cultural, natural and landscape values. Collectively the area is considered of such significance that any camping should occur within areas where there are facilities to service the needs of campers.

Recommended

Penzance Bay Township is confirmed as a prohibited area for responsible camping.

Renwick Urban Area and Domain

Description

The Renwick urban area encompasses the area from the intersection of High Street and Old Renwick Road via State Highway 6 through to the north side of State Highway 63 where it intercepts with Anglesea Street to Boyce Street including River Terrace and from Gee Street to Blicks Lane, including the Domain Area, then into Alma Street North to Oudenarde Street then to Brook Street along to High Street back to the intersection of Old Renwick Road.

The Renwick Urban Area was identified as prohibited for responsible camping in the proposed bylaw. The Renwick Domain was proposed to be a restricted area for responsible camping subject to vehicles being CSC, parking in the marked area, vehicles being limited to 10 and to be parked between the hours of 6pm and 9am and staying no more than two consecutive nights in a four week period.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No specific risk.
	Natural resource values	Y	Minor risk to stormwater drains etc depending on how sewerage and greywater from Non SC vehicles is managed.
	Historical or cultural values	N	No specific risk.
	Landscape and Amenity values	Y	Amenity and landscape values can be adversely affected by presence of campervans, particularly if high numbers, are ongoing or spreads beyond vehicles (eg, washing on lines, tables/chairs etc.)
	Recreation assets	N	Likely to be greater pressure on any facilities such as toilets/rubbish bins etc that are provided at a scale for day use.
Protect health and safety	Natural hazards	N	No specific risk.
	Built environment hazards	N	No specific risk.
	Human hazards	Y	Providing for camping for campers that are not SC may result in facilities being used in unsafe ways (eg, food preparation/utensil cleaning in toilet handbasins).
Protect access	Physical obstruction of access	Y	Minor risk of physical obstruction of access in locations in the town that may be popular for overnight stays. The Domain carpark is away from the rest of the residential area. Some use of the carpark occurs overnight from trucks during vintage.
	High use discouraging access	N	No obvious risk.

The primary rationale for prohibiting freedom camping in the urban area of Renwick relates to effects on access and visual effects. As Renwick is close to a number of different attractions, including wineries, there has in the past been significant use of urban streets and resulting negative impacts. The Renwick Domain is considered an appropriate place for overnight but considered most appropriate for CSC vehicles given that facilities on site are not designed for overnight camping.

A process under the Reserves Act will also be required to enable camping in this location.

Recommended

Renwick Urban Area is confirmed as a prohibited area for responsible camping to protect the area, to protect the health and safety of people who may visit the area and to protect access to the area.

Renwick Domain is confirmed as a restricted area for responsible camping subject to the restrictions notified in the proposed bylaw.

Seddon Urban Area

Description

The Seddon Urban Area encompasses Wakefield Street across State Highway 1 to Marama Road then into Foster Street, including the Domain, connecting into Beaumont Street, encompassing Nursery Lane back to the intersection of Simpson Street, Renwick Street and then along Mills Street to Fearon Street. This Area was identified as prohibited for freedom camping in the proposed bylaw.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No specific risk.
	Natural resource values	**Y**	Minor risk to stormwater drains etc depending on how sewerage and greywater from Non SC vehicles is managed.
	Historical or cultural values	N	No specific risk.
	Landscape and Amenity values	**Y**	Amenity and landscape values can be adversely affected by presence of campervans, particularly if high numbers, are ongoing or spreads beyond vehicles (eg. washing on lines, tables/chairs etc.)
	Recreation assets	N	Likely to be greater pressure on any facilities such as toilets/rubbish bins etc that are provided at a scale for day use.
Protect health and safety	Natural hazards	N	No specific risk.
	Built environment hazards	N	No specific risk.
	Human hazards	**Y**	Providing for camping for campers that are not SC may result in facilities being used in unsafe ways (eg, food preparation/utensil cleaning in toilet handbasins).
Protect access	Physical obstruction of access	**Y**	Minor risk of physical obstruction of access in locations that may be popular for overnight stays.
	High use discouraging access	**Y**	Minor risk of high use discouraging access in locations that may be popular for overnight stays.

The primary rationale for prohibiting freedom camping relates to effects on access and visual effects. As Seddon is on State Highway 1 there has been increasing use of streets and resulting negative impacts. The current prohibition was brought in after lower levels of control failed to sufficiently reduce issues.

Recommended

The Seddon Urban Area is confirmed as a prohibited area for responsible camping to protect the area, to protect the health and safety of people who may visit the area and to protect access to the area.

Blairich Reserve

Description

Blairich Reserve is located approximately 12 kilometres south and west of Seddon, adjacent to and to the east of Awatere Valley Road. This site was proposed as a restricted area for CSC vehicles able to stay no more than two consecutive nights in any four week period.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No conservation values at risk.
	Natural resource values	N	Low risk to water quality if vehicles CSC.
	Historical or cultural values	N	No known historical or cultural values
	Landscape and Amenity values	N	Site out of view with little visual impact from use.
	Recreation assets	N	No physical recreation assets at risk. Evidence of fires lit as this site with potential to damage vegetation on the site and beyond
Protect health and safety	Natural hazards	**Y**	Potential for flood risk during extreme events. Fire hazard has become an increasing risk in the dry east Marlborough rural environment
	Built environment hazards	N	No risk from any built environment
	Human hazards	N	No known risks.
Protect access	Physical obstruction of access	N	No access issues
	High use discouraging access	N	Low use only

For Blairich Reserve the initial site assessment did not raise any significant issues with the continued use of the site for freedom camping. The one issue raised was in relation to the potential for flooding during extreme events. The flooding risk is from the Awatere River which is immediately adjacent to the site. The flood risk is characterised as Level 2 in the Marlborough Environment Plan.

Another hazard of concern is the fire risk that exists in this dry rural location. The potential for fires can result from natural hazards in certain weather conditions but is more likely to result from activities undertaken by humans in this area. Despite no fires being allowed to be lit at the Reserve, monitoring by Park Rangers has on a number of occasions noted the remnants of overnight fires. The site while being adjacent to the Awatere Valley Road has limited options for an escape route in the event of fire.

Recommended

Blairich Reserve is confirmed as a prohibited area for responsible camping to protect the health and safety of people who may visit the area.

Marfells Beach Road

Description

Responsible camping along the Marfells Beach Road leading to the Department of Conservation camping ground at Marfells Beach was prohibited in the proposed bylaw. (Note that it is the road where responsible camping is to be prohibited, not the Department of Conservation campground.)

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	Significant conservation values exist in places along the road/beach area and may be threatened by overnight parking. Includes dune systems and plant and animal communities.
	Natural resource values	Y	No freshwater quality issues apparent.
	Historical or cultural values	N	Long standing iwi connections along the East Coast area generally.
	Landscape and Amenity values	N	Some effect on landscape and amenity values from a proliferation of campervans staying overnight along this road, rather than contained in the DOC camp area.
	Recreation assets	Y	No issues for facilities but potentially damage to dune area.
Protect health and safety	Natural hazards	N	Normal coastal processes
	Built environment hazards	Y	The roadway leading to the DOC camp is narrow and parking along here particularly at night could be hazardous for vehicles needing to enter or leave the campsite.
	Human hazards	N	None evident
Protect access	Physical obstruction of access	Y	May make access into the DOC camp more difficult.
	High use discouraging access	Y	Area of high use particularly so since the Kaikōura earthquakes making the East Coast area more accessible.

The Council assessed a request from the Department of Conservation to prohibit camping on an area of road reserve along the Marfells Beach Road, near the Department of Conservation camping area. This request is specifically related to safety concerns, access of the area and a need to protect the natural environment.

Recommended

Marfells Beach Road leading to the DOC campsite is confirmed as prohibited for responsible camping to protect the area, to protect the health and safety of visitors and to protect access.

Lake Elterwater

Description

Lake Elterwater Road Reserve is an area of legal road located approximately three kilometres north of Ward Township, adjacent to and to the east of State Highway 1.

This small layby is legal road administered by the New Zealand Transport Agency (NZTA). The site was proposed to be removed from the bylaw as it was not an area under the control or management of the Council.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	Y	The site does contain significant conservation values nearby including the presence of various waterfowl that may not benefit from ongoing supplementary feeding.
	Natural resource values	Y	There is a risk to water quality of Lake Elterwater nearby depending on how waste is managed and ablutions/cleaning undertaken.
	Historical or cultural values	N	No specific values known.
	Landscape and Amenity values	N	The site has landscape and amenity values, but these are unlikely to be significantly affected by this use.
	Recreation assets	N	No recreation assets at risk.
Protect health and safety	Natural hazards	N	No known risks.
	Built environment hazards	Y	Close to SH 1 with potential for some safety risk entering and exiting site.
	Human hazards	Y	Some risk for Non SC camping use given low level of facilities and potential for inappropriate hygiene practices.
Protect access	Physical obstruction of access	Y	If overcrowding occurs during peak period access issues will be present.
	High use discouraging access	Y	High use by campers as well as making it physically difficult for other users, they will also be put off by high camping use.

The reason for removing the site from the proposed bylaw is that it is state highway under the control of NZTA and not under the Council's control or management. Under the provisions of the FCA the Council cannot have a bylaw over an area that is not under its control or management – see section 3 of the FCA. For that reason Ward Domain was identified as a location where freedom camping could be appropriate.

In response to a request to consider whether there is a legal way in which the Council could effectively take control of the Lake Elterwater site staff are pursuing a delegation from NZTA under the provisions of the Government Roading Powers Act 1989. This would enable the Council to have management responsibilities for vehicles at the site including for the purposes of freedom camping.

The site has previously been considered an appropriate location for responsible camping although it is in close proximity to State Highway 1.

Recommended

Lake Elterwater Road Reserve is confirmed as a restricted area for responsible camping subject to vehicles being CSC and staying no more than two nights in any four week period. Inclusion of the site in the bylaw is further subject to the Council being able to gain control or management of the site from NZTA.

Ward Domain

Description

Ward Domain is located on State Highway 1 at the northern end of the Ward township. The Domain was proposed to be a restricted area for responsible camping subject to vehicles being CSC, parking in the marked area, vehicles being limited to 10 and staying no more than two consecutive nights in a four week period.

Criteria (Required for bylaw restriction or prohibition)

Criteria	Interpretation	Risk	Risk Management Required (if any)
Protect the area	Conservation values	N	No significant conservation values at risk.
	Natural resource values	N	No known risks.
	Historical or cultural values	Y	Historically and culturally important site which would need to be considered in any site placement but considered manageable.
	Landscape and Amenity values	Y	Risk to amenity values exists but considered able to be managed with careful site design.
	Recreation assets	Y	Care would need to be taken to ensure existing recreation assets would not be damaged by camping use.
Protect health and safety	Natural hazards	N	No obvious natural hazards that require management.
	Built environment hazards	N	No known risks
	Human hazards	Y	Depending on the current level of facilities, hygiene risks may exist – particularly for non SC campers.
Protect access	Physical obstruction of access	Y	Care would need to be taken to ensure community use of this facility is not compromised or made more difficult from this use.
	High use discouraging access	Y	Care would need to be taken to ensure community use of this facility is not compromised or made more difficult from this use.

The Council acknowledged the importance of the wide range of community uses carried out at the Domain and the related values the community expressed about the Domain and nearby memorial. Community use could be compromised or made more difficult if responsible camping was to occur at the site.

Recommended

Ward Domain is confirmed as a prohibited area for responsible camping to protect the area and to protect access to the area.