

Freedom Camping Options Report

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David Hammond
Director Business Lab

(a) Introduction

Waratah Wynyard Council (the ‘Council’, or, the ‘Municipality’) seeks options for freedom camping¹ provisions across the Municipality. This report is developed in the context of the release of the ‘National Competition Policy: Applying Competitive Neutrality Principles to public camping in Tasmania’ January 2019 by the Department of Treasury and Finance. Whilst addressing this significant development, the report focusses its scope on the management of freedom camping in the Municipality.

Council has been on a journey of exploring the policy framework and options for several years with “hot spots” at Boat Harbour Beach, Sister’s Beach and Wynyard. The public have a variety of views both in support of the returns from freedom camping and in opposition to its impacts on congestion, the environment and for others, competition with accommodation providers. Council desires to find the right sustainable approach to freedom camping.

This report provides a methodology and guide for decision-making on future policy. Overall the report concludes:

- There are an estimated 774 available campervans sites in the Municipality, and only 290 campervans estimated to be visiting at-peak. Whilst the figures need confirmation through some better measurement over the summer period, there would seem to be ample supply of non-powered sites in the Municipality already without the need for further investment into development.
- The council’s role is therefore not to provide more supply but in managing the impacts of congestion at peak at some sites, and assisting education of campervans to overnight in the right areas. That addressing of the congested points may be the strongest case for investment in supply but also leads to a conversation with private providers and the public on potential solutions, and assessment of competition.
- An estimate of the contribution of freedom camping to the Municipality’s economy is A\$358,904 per year.
- It is this report’s view that the impact of the Economic Regulator’s provisions will reinforce that council’s strategy is not to provide supply but to mitigate congestion. However it does mean that council will not be able to easily respond

¹ Also called ‘Free Camping’ in Australia.

to community organisations seeking to earn revenue off a council lease area through paid overnighting.

- If council is concerned with the quality of private sector accommodation and facilities provision in this tourism area (which should be known for international quality facilities), Council's strategy will be to look at partnership and potential co-investment with the private sector to raise standards, not to develop competing sites.
- Currently the council's bylaws effectively form a 'blanket ban' on campervan overnighting in the Municipality with the exception of State Highway road verges (not under council control).
- Bylaw provisions to provide for specific sites for freedom camping would have to be well-crafted and well-consulted, and now also come under the spotlight of the guidelines for competitive neutrality. Such provisions should address number of vehicles at a site, self-containment, times of the year, hours of parking, radius around the vehicle permissible for campers to spread their washing and possessions, restrictions on using public drains for washing down food material, fires, dogs on leashes and noise.

Introduction to National Competition Policy

The National Competition Policy provides some guidance on definitions important in freedom camping:

- **Public camping** includes the provision of temporary or permanent facilities or activities that attract, benefit or provide for overnight camping in a place owned or controlled by a public entity, irrespective of whether a fee is charged for the use of any facilities provided. Public camping is considered to be facilitated by a public entity where a public place under the control or responsibility of that entity is used for public camping purposes, regardless of whether or not the entity intended for that place to be used for the purpose of public camping.
- **Below cost public camping** means public camping provided without the application of full cost attribution pricing principles, including free camping. (p.3)

To maintain a fair business environment where local government is not deemed to compete with private business, particularly Caravan Parks, the Economic Regulator's test for competitive neutrality can be defined in practical terms as:

"The Policy Statement provides that public camping facilities are significant business activities where the number of public camping spaces facilitated by the public entity is more than 10 per cent of the total number of non-powered camping spaces (public and private), within a 60 kilometre drive from the public camping facility."²

In defining the 60km drive, guidance is given that if there are more than one Caravan Park within 60km of each other then they are regarded as being in the "same market area". The 60km drive is reportedly a

² P.1 Application of Competitive Neutrality Principles to public camping in Tasmania, Economic Branch, Department of Treasury and Finance, January 2019

considerably larger distance than the 20km drive sought by private Caravan Park operators in other states.³

(b) Value of Freedom Camping

A survey undertaken by Free Camping Australia (FCA) released in 2017 indicated the following of 400 free campers' surveyed²:

- 83% are retired
- 59% report that they stop for 3 days
- 82% were travelling for more than 2 months
- 14% usually stay in a Caravan Park. Due to the age group, noise associated with young people and families is a disincentive to staying in the Caravan Parks

The 'spend' by freedom campers from the Survey was estimated at A\$100 per day excluding any accommodation costs (p.43). This is a comparative result with New Zealand where freedom campers spend on average NZ\$90 per day⁴ and includes a significantly larger non-self-contained van market. Most of the benefit of that expenditure in Australia is to service stations selling fuel and supermarkets. The amount of weekly expenditure in all other local shops combined is estimated at only A\$120 (or, A\$17 per day). Freedom camping is therefore considered a low-value tourism activity. By way of comparison, in New Zealand, other visitors (non-freedom campers) spend NZ\$190 per week; or, NZ\$100 more per week than freedom campers.

It is noted that the Caravan and Motorhome Club of Australia (CMCA), which is the membership body for self-contained RV owners, calculated a higher figure of A\$130 per week (or, A\$18.50 per day) in 2016 – the same year as the FCA Survey which has the lower financial estimate.⁵ The discrepancy is expected as there is a higher percentage of fully self-contained vehicles and an older demographic in the CMCA.

³ A Survey of Free-Camping Travellers Across Australia, Phil Jones, 2016, Free Camping Australia

⁴ What free campers are worth to NZ, 15 February 2019, Otago Daily Times

⁵ CMCA RV Park Update, Colin Balfour, 27 May 2016

(c) Council Bylaw Provisions regarding Overnights

In preparation for this options report council staff have undertaken a thorough review of the overnighting provisions afforded by bylaws. The following indicate that the regulatory environment is generally prohibitive to overnighting with some exception, including state highway road reserves which are not under Municipality bylaws.

Camping Rule 29 states: “A person must not in a public reserve or part of a public reserve camp or station and occupy a caravan, motorhome or other motor vehicle except in accordance with signage erected in that public reserve or part of a public reserve.: Penalty: Fine not exceeding 5 penalty units.

The following table identifies overnighting provisions on different classes of reserve land in the Municipality. In general, council bylaws have a ‘blanket ban’ on overnighting in reserve areas with the exception of some limited provisions for parking longer (for example, 6 hours on some reserve carpark areas).

Table 1: Overnights on Reserve Land in the Municipality

Class of Reserve	Overnights Permission Under Regulations	Notes
State Highway road reserve	Permitted	Correspondence with Tasmanian Regulator but needs confirmation
Council road reserve	Not Permitted	Comes under Division 3 s. 13 (2) Driving vehicle over footpath, kerb and gutters
Council urban area road reserve	Not Permitted	As above
Council reserve carparks	Largely prohibited but some have limited restrictions	Comes under Part 4 s. 39 Parking Areas (Parking longer than maximum period) Parking areas are dictated by individual signs (Some reserves have 6hr time limit)
Council reserves	Not Permitted	Comes under Division 2 Disallowed and Controlled Activities; s. 29 Camping

(d) Overnighting at Peak In Waratah Wynyard

Calculating the number of campervans overnighting at peak is critical to managing the flow and location of vehicles. From a tourism perspective, there needs to be “demand management” of vehicles at locations to avoid overcrowding at popular sites which potentially has adverse community and environmental outcomes. In an economic sense there can also be unintended consequences for accommodation providers.

Unfortunately there is no data for the number of campervans in the Waratah Wynyard area at peak (which would be the first week of January annually).

Anecdotally, Enforcement Officers estimate that there could be 50 campervans in public areas outside of Caravan Parks.

Council Provision of RV Overnighting

Currently Waratah Wynyard Council does not directly provide any specific campervan parking in the Municipality on public land. Council has a lease with the Agricultural and Pastoral (A&P) Society for the Wynyard Showgrounds and permitted a development application from the A&P Society for the purpose of providing RV parking. The Wynyard Showgrounds is the only council designated free overnight campsite in the Municipality. This arrangement with the A&P Society was tested with the Economic Regulator who deemed it not to be a breach of competitive neutrality by the council.

Other Providers of Campervan Sites

Table 2 (following page) outlines an estimate of non-powered sites suitable for RV overnighting by other entities within a 60km drive of Wynyard.

Table 2: Provision of unpowered RV sites within a 60km drive of Wynyard.

Name	location	No. Unpowered sites	Cost (2 max)
River Breeze Caravan Park	Smithton	10	\$30
Stanley Cabin and Tourist park	Stanley	(up to) 15	\$28
Tall Timbers	Smithton	(est) 25	free
Crayfish Creek Van and cabin park	Crayfish Creek	(up to) 35	\$20
Rocky Cape Tavern Leisureville Holiday centre	Rocky Cape	(up to) 200	\$5 Wynyard
Somerset beachside Cabin and Caravan Park	Somerset	(up to) 50	\$25
Beach Retreat Tourist park	Wynyard	20	\$35
Burnie Ocean View Motel and Caravan Park	Burnie	(est) 40	\$24
Penguin Caravan Park	Penguin	(up to) 15	\$25
Apex Caravan Park	Ulverstone	18	?
Big 4 Ulverstone Holiday park	Ulverstone	21	\$38
Pioneer Park camping ground	Riana	(est) 20	\$12
Wings Wildlife Park	Gunns Plains	(up to) 80	\$13
OC Ling Caravan Park	Turners beach	14	\$20
Blue Wren Tea garden	Ulverstone	6	\$10
Waratah Caravan and Camping ground	Waratah	(est) 15	\$22
Boat Harbour	Wynyard	(est) 20	Free
Wynyard Show Ground		(est) 8	Free
Halls Point	Sulphur Creek	(est) 12	free
Preservation bay	Preservation bay	(est) 15	free
Nicholson Point	Ulverstone	(est) 5	free
Forth Recreation Ground	Forth	(est) 15	free
Leven Canyon	Leven Canyon	(est) 6	free
Cooee Point	Burnie	(est) 25	free
Montagu Park Camping ground	Montagu	(est) 60	\$17
Stanley recreation ground	Stanley	(est) 45	\$10
Peggs Beach Camping Area	Peggs Beach	(est) 25	\$13
Black River Camping Area	Black River	(est) 20	\$13
Bluff Caravan Park	Devonport	20+	?

It is noted that 200 places at Rocky Cape Tavern is an estimate provided by the operator. The shaded sites are private providers and the others are public provision – although some may meet the threshold for full cost attribution.

The market has been measured according to a 60km drive distance from the private Caravan Parks in the Wynyard area. The measurement will be different depending on

the exact location which is spread between Boat Harbour Beach and Somerset. Depending on the start point different calculations apply. The unpowered site numbers appear as estimates in some cases as the operators were unable to provide an exact number due to the spaces being undefined and therefore numbers fluctuate.

Provider	Spaces	% of market
Private	531	68%
Public	243	32%
Total Market	774	

Based on the total market being 774 unpowered sites the allocation for public provision is 77 (10%) across the market, charged at an average of A\$27.30 per night.. Waratah-Wynyard Council currently provides approximately 43 places which is around 6% of the total market. Prices range from Nil to A\$38, with an average of A\$19.84 per night for those who charge. Were campervans to be directed to only park in paid sites, this would double their daily average campervan expenditure and may impact on the length of stay in Tasmania.

For the sake of this report, it is estimated that there are double the number of campervans overnighting in powered sites within these establishments, making that number 170. Whilst this may be inaccurate, the methodology will be one that Council can use in future to improve on the accuracy of managing campervan overnighting demand. Although the Economic Regulator excludes this figure, assessing capacity for demand management means this figure should be included in that calculation.

On the basis of these assumptions, at peak the Waratah Wynyard Municipality has:

- 43 campervans overnighting in public places
- 77 campervans overnight in unpowered sites
- 170 campervans overnight in powered sites⁶,
- Giving a potential total of 290 campervans overnighting at peak in Waratah Wynyard
- This may represent A\$4,930 per day visitor spending in the peak period (or, A\$34,510 per week)
- At an annual occupancy rate of 20% for Caravan Park spaces this may represent A\$358,904 per year to the area's economy.

Taking a broader perspective, the 60km drive calculation estimated the availability of 774 unpowered sites alone, and an estimated 290 campervans in the Municipality at peak. There would seem to be ample capacity in the region's existing private accommodation provider sector to cater for the number of campervans visiting the Municipality at-peak. This is hardly surprising as the private accommodation market usually only invests in the number required.

The key issue, however, is that many of the campervans neither know where sites are available before they drive to an area, nor would they necessarily change their overnighting behaviour even if they did know. Many would still want to overnight in places which have beautiful sunsets and beaches even if they knew that there was

⁶ Note: These are excluded from the Economic Regulator considerations, but are relevant in finding total numbers of campervans potentially overnighting in the Municipality.

capacity at less desirable sites. Campervan drivers are becoming better informed of the remaining sites at various Caravan Parks through apps which other campervan drivers update in real-time.

(e) Demand Management Options

The analysis in this report suggests that council can provide an additional 34 overnighting sites to arrive at the competition threshold but there is likely not the need for council to be a provider of additional sites due to sufficient capacity in the market at peak. The only valid justification for council to be involved in changing the overnighting preferences of campervan visitors is to avoid overcrowding of vehicles at popular public land sites, causing stress to communities and the environment.

In other words, Council's key function is not to provide supply but to manage demand particularly at peak. The options in the remainder of this report will be focussed at managing demand at sites which have become overcrowded on public land.

An issue for council is that the quality of accommodation and the connected ablution facilities at private sites may not be of high enough quality to drive a tourism economy. A tourism economy needs to be aiming for international quality facilities and service. In addressing this issue, council would not compete in the market with higher quality facilities but would need to potentially co-invest with the private sector at key sites. If council owns Caravan Park leases, council should consider taking back control of these leases when the opportune time arose so that the Caravan Parks can be better integrated into the tourism strategy of the region by investing into the gaps in quality or types of services that should be provided to international standard.

In saying this, the report would like to acknowledge good practice examples from elsewhere in Australia such as Bunbury, West Australia, where the council is taking a proactive stance to allow more freedom camping⁷. West Australia does not have the same State regulations around competitiveness as Tasmania. However, Bunbury is trialling three overnight rest areas for a period of two years with the following provisions:

- All of these stops are free, with a 48 hour limit.
- Bunbury Council will also investigate the possibility of installing a dump point somewhere within the City boundaries.
- Once they are open, travellers will need to call into the Bunbury Visitor Centre to pick up a permit
- They will also receive a welcome pack including information about Bunbury such as locations of commercial caravan parks, maps and tourist guides.
- City officers will patrol the sites to ensure the areas are only attended by fully self-contained vehicles – because camping in tents, or sleeping in cars will not be permitted.
- After twelve months, council will consult with users and the community to assess any social impacts before doing a final review at the two-year mark.

⁷ <https://www.campsaustraliawide.com/3-free-new-camps-in-bunbury-wa/>

Policy Options

This report recommends the following be the principles for the development of options:

1. A warm embracing area to visitors in a way which balances economic benefits with Municipality values and quality of environment
2. Working hard to ensure that all visitors are good neighbours, and the Municipality is a good host by providing the right facilities at the right places for free camping vehicles
3. Providing excellent education and information to assist visitors
4. Encouraging of free camping but with more restrictions on overnighting of non-self-contained vehicles and in public places under pressure from overnighting

The Municipality has several broad approaches it can take to the management of free camping. It is the view of this report that the “Balanced Welcoming” approach be adopted. The options are summarised as:

Option 1: Permissive Open

“We’ll have a worldwide reputation as the most embracing area of the free camper in Tasmania; we will build an international culture and visitors will stay more nights for the benefit of all Waratah Wynyard.”

The permissive option seeks to advertise the area as “RV friendly” and extends the range of facilities (such as toilets and carparking) that council would fund to address the destination pressures. It would be the most embracing area of the freedom camping culture and look to enhance a vibrancy of culture and the international flavour that many campervan drivers bring. In many ways the freedom camping culture takes precedence over the sensitivities of some disaffected local people. The benefit of the campervans potentially staying more nights outweighs the dissatisfaction of a few.

Specifically the following:

- Self-contained and non-self-contained are embraced by the Municipality with reasonable time restrictions in the Bylaw and within the 10% threshold of the economic regulator provisions
- Allow overnighting of self-contained and non-self-contained for 3 nights in designated public places
- Caravan Parks are promoted as ‘another option’ for drivers
- Enhance partnerships, signage and education

Option 2: Balanced Welcoming

“We seek to be good hosts of our visitors and we seek them to be good guests when they come to our place. To achieve that we'll give a high level of warm, welcoming support and embrace their cultures, but we will also put in place the measures to protect the values and environments important to us.”

The Balanced Welcoming option embraces freedom camping warmly as a valuable economic contribution to the area, as adding to the international culture of Waratah Wynyard. But this embracing is balanced by the pragmatic realisation that as much as it is freedom campers' onus to act responsibly, there will always be a sizeable element who do not hold the same values as the communities they stay in. Therefore stricter controls are placed over non-self-contained vehicles. But overall the Municipality takes the view that it seeks to be a good host and it seeks freedom campers to be good guests. A sizeable effort and investment is put into education, information, signage and partnerships to maximise the benefit from freedom camping whilst minimising the negative stresses of tourist destination pressure.

Specifically the following:

- Reviews bylaw provisions to be specific in management of effects
- Morning and evening compliance patrolling to both infringe and advise people to move on to appropriate areas
- Allow overnighting of self-contained campervans for 3 nights but no non-self-contained vehicles are permitted in public areas
- Enhance partnerships, signage and education

Option 3: Prohibitive Closed

“The campervan culture is one our ratepayers and our environment can no longer afford. That's why we invested in campgrounds in the first place.”

The Prohibitive Closed option seeks to prohibit the Municipality's public spaces to campervans and promote staying in Caravan Parks only. The approach says that really it is the CMCA responsibility to build sites for RVs, or support existing Caravan Parks, and the transfer of their problems to the local council is not appreciated. The option recognises that the minimal spend of A\$100 spend per day by campervans is simply not worth the council's efforts and funding of anything more. Waratah Wynyard's vision is for value-added tourism products to grow the economy and the freedom camping lifestyle is simply not the image for the area nor

for its future tourism. Freedom camping is not a problem because that's why ratepayers funded Caravan Parks who get a financial return from the freeloaders.

Specifically the following:

- Self-contained and non-self-contained are welcomed to park in daylight hours
- Council not permit any further sites but direct to Caravan Parks
- Morning and evening compliance patrolling to both infringe under Bylaws
- Caravan Parks are heavily promoted as the only overnighting option for both self-contained and non-self-contained vehicles
- Enhance partnerships, signage and education

This report takes the position that the “Balanced Welcoming” approach is most appropriate for the Municipality. This option recognises that campervans will continue to seek to park in public areas across the Municipality. A response to have Enforcement Officers infringing them for doing so would not be the tourism image the area needs. Alternatively a permissive approach allowing overnighting in public places ignores the issues of community stress in congested areas and environmental damage from non-self-contained vehicle occupants. Allowing such behaviours will quickly grow community opposition against tourism.

Almost all options require the review of bylaws. The current bylaw provisions deal with restrictions during daylight hours only. It is noted that under a Balanced Welcoming approach, the regulatory framework is complemented by an investment into information for incoming campervan drivers. The role of these methods is discussed as:

- **Information:** Clear signage at areas permitted for overnighting, online and written material about camping in the Municipality, and potentially some “layby” areas coming into the area where campervans can pull over and read large information signs about the area and camping.
- **Enforcement backed by a Bylaw:** Enforcement Officers are warranted to enforce. The approach taken is an evening and a morning patrol of hot spots (and also respond to calls). In the evening the Officers patrol near to the hour of overnighting to advise where to responsibly park and promote the Caravan Parks. They return soon after and if the vehicle has not moved then they infringe. In the morning patrol before the hours of overnighting have ended the Officers infringe because the vehicle has stayed overnight illegally. Each permitted area must be adequately signposted with the restrictions and identified in a Schedule to the bylaw.

(f) Appropriate Regulations

The reasons for permitting overnighting need to be justifiable and linked to management of congestion at peak times of the year. In establishing areas permitted for overnighting, the following criteria could be used for the assessment:

- a. **Protection of the area:** This criterion recognises the length of RVs that can limit other vehicles' movements or protrude over footpaths alongside the parking area limiting access to the elderly, pushchairs and mobility impaired. The criterion also recognises that public access to the reserve or foreshore needs to be retained for amenity values.
- b. **Protection of the environment:** This criterion recognises that the council is obliged to protect sensitive natural environments such as dunes, flora and fauna such as bird breeding areas and also cultural areas. The criterion recognises that RV owners may have dogs that if let loose may threaten bird species.
- c. **Protection of public safety:** This criterion recognises that an RV can pose a traffic hazard, can be near a reserve area subject to flash flooding or can be at-risk from a known vandalism area.
- d. **Protection of the competitive environment:** This criterion recognises that in making additional provision, the number of spaces cannot cross the threshold of competitive neutrality.

Free Camping Definitions and considerations:

The following considerations are developed to support the “Balanced Welcoming” approach through bylaw drafting:

- I. **Peak:** Council will need to determine if its regulations apply year-round, or just at peak. For council may simply choose to apply the regulations during the peak period and long weekends.

Recommended: The regulations apply only over peak. The definition of “Peak” is: The period from 1 December to end-February plus long weekends

- II. **Cost of Enforcement:** The cost of enforcement can be offset by ensuring that the infringement revenue is ringfenced to the enforcement activity. In New Zealand the legal fee is up to NZ\$200. This fee goes a long way to employing a new Enforcement Officer for the peak period.

Recommended: Infringement fee be A\$200 if this can be legally justified by the council under enabling legislation. This revenue be ringfenced to the enforcement activity.

- III. **Enforcement Approach:** The consistency of enforcement, and the clarity of the rules for Enforcement Officers is critical to success.

Recommended: The approach to enforcement by officers in a “Balanced Welcoming” option is to greet freedom campers warmly, give out information on the right places to overnight, and then return later to check on their compliance. If there is no compliance then to infringe with the right of appeal.

IV. **Collection of Unpaid Fines:** Collection of unpaid fines particularly from international drivers is an issue. Depending on whether the council pursues the debt and the ease of payment methods online, rates of collection of free camping fines can vary from 30% to over 85%.

V. **Self-containment:** Council will need to determine whether the regulations apply to self-contained and/or non-self-contained vehicles. This report takes the position that non-self-contained be prohibited from overnighting in any public area due to the impact on the environment. The definition of self-containment will be required for Enforcement Officers to be effective.

Recommended: The approach recommends a prohibition Municipality-wide on overnighting by non-self-contained vehicles. A possible definition of self-containment could be: "Self-contained means a vehicle designed and built for the purpose of camping which is configured to meet the ablutionary and sanitary needs of occupants of that vehicle for a minimum of two days, without requiring any external services or discharging any waste."

VI. **Overnighting Hours:** The overnighting hours need definition. They also need to integrate with the Municipality's Parking Bylaw hours so there is no overlap in hours. In questioning the Economic Regulator's view on overnighting hours, they directed the author to the dictionary. Unfortunately a dictionary definition will not be sufficient if concerned members of the public undertake their own assessment of whether tourists are "overnighting" or not. In a litigious area, the hours of overnighting need to be clearly stated.

Recommended: That depending on the Parking Bylaw, the hours of overnighting be 10pm to 7am.

VII. **Number of Nights:** The number of nights that a self-contained RV is permitted to overnight in a public space needs to be stated in the regulations for the sake of community and Enforcement Officers' clarity.

Recommended: 2 nights consecutively and for a maximum of 2x per month in a given location. This ensures that the RV is not semi-permanently parked in a permitted area.

VIII. **Number of RVs in a Location:** It is recommended that an assessment of every site be undertaken proposed to permit overnighting. That assessment be based on the assessment criteria above, and that guide the number of self-contained RVs permitted in any one location.

Recommended: In general, no more than 2-3 RVs be permitted at any one site in a public place due to the cumulative impact of the vehicles. This to be established further by public consultation on a site.

IX. **Role of the Private Sector:** The private sector is a significant part of the solutions to tourism peak demand. The role of Caravan Parks is central to the safe and healthy management of tourism with adequate facility provision. In addition, other private

sector solutions frequently provide solutions for free camping such as supermarket carparks. This does not require council intervention.

Suggested Schema

In reviewing the policy, regulatory and public feedback to the issue of managing freedom camping over the past decade, the following is recommended. This schema is consistent with a “Balanced Welcoming” approach which embraces freedom camping but in a managed way which addresses congestion, environmental protection, and ensures a fair competitive environment with Caravan Parks.

1. Draft regulations for proposed permitted areas to cover the hours outside of those managed under parking restrictions.
2. Prohibit the overnighting of all non-self-contained vehicles in council owned or administered public land due to the impact on the environment and public amenity. These vehicles must overnight in Caravan Parks and other private sector options.
3. Permit the parking of self-contained RVs at “Hot Spots” across the Municipality including Sister’s Beach through the criteria in this report and public consultation.
4. Restrictions are:
 - a. Overnighting hours are 10pm to 7am
 - b. No more than 3 self-contained RVs overnighting in a permitted site, unless posted otherwise
 - c. The contents of vehicles are to be contained to a 1.5m radius from the vehicle
 - d. Other council Bylaw restrictions apply including dog control, noise, fire bans
5. Enforcement Officers to undertake late night and early morning patrols to coincide with the hours of overnighting.
6. Each permitted site to be posted clearly with the restrictions applying.

(g) Summary

This report has taken a high level view of the issue of freedom camping management in Waratah Wynyard. The purpose is to provide sufficient advice for the development of a schema that manages campervan demand, particularly at peak, and meets the thresholds of the Economic Regulator.

Accurate advice needs to be built on an assessment of peak demand which is not yet available. Assumptions have been made to illustrate concepts and to show how peak demand analysis can underpin policy. That said, an assumption of demand and supply has been attempted which indicate that there is likely sufficient supply of sites in commercial Caravan Parks (mainly) over peak. The conclusion reached is that council’s key role is not in providing more supply, but managing “hot spots” of congestion or public conflict.

An approach is suggested of balancing a welcoming approach to tourism with managing the effects of that campervan based tourism on communities and the environment. To support this the report recommends regulations covering matters from hours of overnighting to the criteria on which to permit overnighting.

Acknowledgements

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