

7th September 2020

Marlborough District Council
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Attention: - To Whom it may Concern



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In Response to Proposal of Review Marlborough District Council Freedom Camping Control Bylaw 2012

Deluxe Group Ltd support in full the proposed requirement of Certified Self Contained (CSC) vehicles. We understand the frustrations of the general public with the few that flout the self-containment rules. Based on our experience within the industry however we do genuinely believe that it is a disrespectful few who ruin it for all. Regardless we support CSC vehicles and believe more prudent and active policing is required on vehicles that do not meet the standard.

We do however oppose the park over restrictions placed on responsible campers. The Responsible Camping Review for Marlborough District Council undertaken by Paul McArthur states that the council “has a welcoming approach to all forms of camping within that district”. This is most certainly not the view and opinion of the many customers and New Zealand Motor Caravan Association (NZMCA) members we talk to. Many NZMCA members simply pass through Marlborough to a more friendly and accessible town to stay overnight. We believe this is to the detriment of Blenheim and Marlborough as a whole. Particularly given many of these members are well heeled travelling in valuable motorhomes, buying food, supplies, eating at local restaurants and the like.

We believe that the scope of the bylaw is far too restrictive unnecessarily prohibits responsible campers from urban areas like Blenheim. It also provides far too much prohibition through many of the wider areas of Marlborough. Many roads throughout the region are prohibited where single vehicles could easily and safely find place to park overnight. The view that these roads are unsafe to park next to is unjust, particularly given the move to CSC vehicles only. We cannot imagine any person wanting to park their costly asset in a dangerous and precarious location. The bylaw in its current draft is an extensive and effective prohibition of far too many areas and does not meet the intent and requirements of the Freedom Camping Act 2011 (FCA). It also makes it difficult for visitors to establish the locations that are permissible. The way it is presented it effectively advertises the “restricted sites” as the only suitable stay over sites. This is very misleading for people who do not understand that the FCA doesn’t permit for complete prohibition. This appears to be an act of bad faith to try and contain campers to specific locations in restricted numbers. This is reinforced by the fact the default to the FCA requirement is tucked away under clause 6 and easily glossed over.

We believe the draft bylaw a disproportionate response to the perceived problems. For example, it is unnecessary to prohibit CSC campers from urban areas like Blenheim in order to protect the environment when the same vehicles are permitted to freedom camp elsewhere in the district. Opening urban areas will disperse campers and reduce congestion/access issues in particular areas.

We would love to see Marlborough become an NZMCA Motorhome friendly town (<https://www.nzmca.org.nz/mhf>). Currently Marlborough features as a large blank area at the top of the South Island, whilst most of the rest of the country shines in bright supportive colours in the Motorhome Friendly publication. All supported towns and regions are actively promoted to the 90,000 NZMCA members. Many specific events are also promoted to members drawing them into these towns. Marlborough currently misses out on all of this opportunity and cashflow because it does not fit the current criteria and it's bylaw is too restrictive.

To summarise we support the move to Certified Self Containment but believe that the draft bylaw provides an overreaching effective prohibition on stay over parking areas is misleading and does not meet the requirements of the FCA. We urge the council to find a more suitable middle ground that allows CSC vehicle responsible campers to stay in our region with much more freedom.

Kind Regards,

Daryl Smith



General Manager - Deluxe RV Group