

# Proposed Selwyn District Plan



## Section 32 Report

### Camping Grounds

## 1.0 Overview and Purpose

This s32 is for a minor topic and therefore contains limited analysis and needs to be read in conjunction with the land-use s32s. Minor topic s32 were designed to provide a consistent integrated approach for certain activities across all land-use zones.

It is important, though, that camping grounds are analysed consistently across the district. This topic focuses on new camping grounds and the alteration of existing camping grounds. Some camping grounds in the district are located on reserves and are managed through the associated Reserve Management Plan.

Freedom camping is camping on public land not recognised as a camping ground or similar. Within the Selwyn District freedom camping is not permitted in a reserve unless explicitly stated. Currently freedom camping locations, where freedom camping is encouraged, are Coes Ford, Chamberlains Ford, Lakeside Domain, Whitecliffs Domain, and Harper Intake. Selwyn District Council does not have a freedom camping bylaw, meaning, under the Freedom Camping Act, freedom camping is permitted anywhere.

The key changes from the Operative Selwyn District Plan are identifying camping grounds as an activity and specifically providing for them in appropriate areas. The operative plan has no provision for camping grounds within the Township volume and could be established under the broad activity status of visitor accommodation.

## 2.0 Resource Management Issue

The evaluation of the appropriateness of the camping grounds sub-section is based on the following issue:

**Issue 1 – Camping grounds help people experience the outdoors, however, these activities can affect the surrounding environment.**

Camping grounds play an important role for tourism by enabling people to experience the outdoors. In the Selwyn District, these are largely located in rural areas on Council owned reserves or Crown-owned land and are often associated with special amenity values. This requires camping grounds to be carefully designed, located and operated, while providing residents and visitors a chance to enjoy the reserves, rivers, lakes or landscapes. Requirements for operating can range from restrictions on noise, light spill and glare, visual amenity, traffic generation, parking, and waste generation, as well as protection of identified cultural, historic, or ecological values. Further, there are also potential impacts of other activities that occur around camping grounds. As most are located rurally, the impact of farming or cropping can negatively impact a camping ground, as well as vice versa. Whilst the use of these areas is often seasonal, permanent buildings such as bathrooms, cooking or sleeping facilities may be needed. The provision and location of this infrastructure, including access to these locations, therefore needs to be carefully considered.

There are a number of other processes and legislation outside the District Plan that apply to the establishment and operation of camping grounds and this is discussed in more detail below.

## 3.0 Regulatory and policy direction

### 3.1 Part 2 of the RMA

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA. Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources. Sustainable management includes managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. In achieving this purpose, authorities need also to recognise and provide for the matters of national importance identified in s6, have particular regard to other matters referred to in s7 and take into account the principles of the Treaty of Waitangi referred to in s8.

Managing camping grounds allows people and communities to provide for the well-being and their health and safety (s5), and helps the maintenance and enhancement of amenity values (s7c).

### 3.2 National Instruments

The following national legislation / regulations are relevant to this topic / issue:

#### **National Planning Standards**

The National Planning Standards contain a definition of 'visitor accommodation' which would include paid 'camping ground facilities' due to the requirement for a tariff. Unpaid camping sites including freedom camping sites would not come under this definition.

- **Visitor accommodation:** means land and/or buildings used for accommodating visitors, subject to a tariff being paid, and includes any ancillary activities.

#### **Reserves Act 1977**

The Reserves Act provides for the acquisition of land for reserves, and the classification and management of reserves. This Act sets out that the administering body of a reserve, may set apart any part or parts of the reserve for camping grounds, construct and develop such camping grounds, and fix reasonable charges for the use of such camping grounds.

The administering body must prepare and submit a Management Plan for the reserve under its control management or administration to the Minister of Conservation (under s.41 of this Act). This plan shall provide for and ensure the use, enjoyment, maintenance, protection, and preservation, and the development of the reserve for the purposes for which it is classified, in accordance with the principles set out for a reserve of that classification. Before preparing a management plan, Subsection (5) requires the administering body to:

- (a) give public notice of its intention to do so; and
- (b) in that notice, invite persons and organisations interested to send to the administering body at its office written suggestions on the proposed plan within a time specified in the notice; and
- (c) in preparing that management plan, give full consideration to any such comments received.

However subsection (5) does not apply in any case where the administering body has, by resolution, determined that written suggestions on the proposed plan would not materially assist in its preparation.

Once a draft management plan is prepared, Subsection (6) requires the administering body to:

*(a) give public notice complying with section 119 stating that the draft plan is available for inspection at a place and at times specified in the notice, and calling upon persons or organisations interested to lodge with the administering body written objections to or suggestions on the draft plan before a specified date, being not less than 2 months after the date of publication of the notice; and*

*(aa) send a copy of the draft plan to the Commissioner; and*

*(b) give notice in writing, as far as practicable, to all persons and organisations who or which made suggestions to the administering body under subsection (5) stating that the draft plan has been prepared and is available for inspection at the place and during the times specified in the notice, and requiring any such person or organisation who or which desires to object to or comment on the draft plan to lodge with the administering body a written objection or written comments before a specified date, being not less than 2 months after the date of giving of the notice; and*

*(c) make the draft management plan available for inspection, free of charge, to all interested persons during ordinary office hours at the office of the administering body; and*

*(d) before approving the management plan or recommending the management plan to the Minister for approval, give every person or organisation who or which, in lodging any objection or making any comments under paragraph (a) or paragraph (b), asked to be heard in support of his or her or its objection or comments, a reasonable opportunity of appearing before the administering body or a committee thereof or a person nominated by the administering body in support of his or her or its objection or comments; and*

*(e) where the management plan requires the approval of the Minister, attach a summary of the objections and comments received and a statement as to the extent to which they have been allowed or accepted or disallowed or not accepted.*

A number of Reserve Management Plans, prepared by the Selwyn District Council, identify those areas permitted for camping. The Reserves Act process therefore gives stakeholders and interested parties an opportunity to submit their views on the location of these areas. The need for the Minister to approve these Plans also enables oversight at the national level.

### **Camping-Ground Regulations 1985 (under the Health Act 1956)**

The Camping-Grounds Regulations 1985 (Regulations) are the legislative mechanism that regulates camping grounds. The Regulations were made under section 120B of the Health Act 1956, signalling that their overall purpose is to promote and protect public health. The Regulations apply only to camping grounds for which payment of some form of fee or reward is required in order to camp. The camping ground must be available to at least two camping parties (meaning a single group of campers in a residential backyard are not caught by the Regulations).

The Selwyn District Plan definition of 'camping ground facilities' cross-references the definition of 'camping ground' set out in the Camping-Ground Regulations 1985 which is as follows:

***'camping ground'** means any area of land used, or designed or intended to be used, for rent, hire, donation, or otherwise for reward, for the purposes of placing or erecting on the land temporary living places for occupation, by 2 or more families or parties (whether consisting of 1 or more persons) living independently of each other, whether or not such families or parties enjoy the use in common of entrances, water supplies, cookhouses, sanitary fixtures, or other*

*premises and equipment; and includes any area of land used as a camping ground immediately before the commencement of these regulations’.*

These regulations require any land being used as a camping ground to be registered with a Local Authority and to comply with a range of operational standards such as rubbish disposal, cleanliness, size of cabins, campsites and relocatable home sites, and lighting.

Freedom camping areas are not caught by the Regulations, given that no payment is made in order to camp.

### **Freedom Camping Act 2011**

The Act expressly permits freedom camping on local authority and conservation land unless the administrators of that land prohibit or restrict it as an activity. Freedom camping specifically excludes camping at a ‘camping ground’ which is subject to a current certificate of registration under the Camping Ground Regulations 1985 and any site at which a fee is payable for camping.

There are several free camping sites within Selwyn District on land managed by the Department of Conservation (National Park estate), Trustpower (Harper River) and reserves managed by Selwyn District Council (Whitecliffs Domain, Timber Yard Point Lakeside Domain, Coes Ford and Chamberlains Ford).

## **3.3 Regional Policy/ Plans**

The following regional planning documents are relevant to this topic:

### **1. Canterbury Regional Policy Statement**

The Canterbury Regional Policy Statement 2013 (CRPS) sets out the strategic framework for managing the use, development and protection of the natural and physical resources of the Canterbury region in an integrated and co-ordinated manner. Under the RMA, authorities must give effect to the CRPS.

Chapter 5 of the CRPS sets out resource management issues associated with development which results in changes to urban, rural-residential, and rural areas. Development can enable people and communities to provide for their social, economic and cultural well-being and can promote positive changes to the environment. However, if not appropriately managed, development can result in changes to natural and physical resources that do not promote sustainable management.

## **3.4 Local Policy/ Plans**

The following local regulations/policies are relevant to this topic / issue:

### **The SDC Parks and Reserves Bylaw 2009**

This is relevant to camping in parks and reserves vested in or under the control of the Selwyn District Council. Section 10 of the Bylaw addresses camping in reserves and requires written authorisation to be obtained for such activities. This requirement does not apply to authorised camping grounds.

## **Reserve Management Plans**

Reserve Management Plans have been prepared for a number of Council owned reserves where camping is permitted including Chamberlains Ford (free), Coes Ford (free), Timber Yard Point Lakeside Domain (free) and Glentunnel Domain (containing the Glentunnel Holiday Park)<sup>1</sup>.

## **Selwyn 2031 – District Development Strategy**

This strategy identifies the need for the District to create destinations and iconic events which will encourage people to visit, stay and contribute to the local economy. Its vision is “to grow and consolidate Selwyn District as one of the most loveable, attractive, and prosperous places in New Zealand for residents, businesses and visitors”. Tourism has not played as much of a significant economic role as anticipated in the 2005 Economic Development Strategy. This is particularly relevant to camping grounds which cater to the needs of tourists.

## 3.5 Other

### ***Iwi Management Plan***

When preparing or changing a district plan, Section 74(2A)(a) of the RMA states that Council’s must take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.

Of particular relevance to camping, the IMP identifies that unserviced freedom camping is having adverse effects on the environment and Ngai Tahu values (5.6 Tangaroa, Issue TAN12). Two policies are relevant to this issue:

*TAN12.1 To work with local authorities, the Department of Conservation and the wider community to identify areas where freedom camping is prohibited or restricted.*

*TAN12.2 To support the use of incentives and information as tools to encourage campers to camp in designated, serviced sites as opposed to freedom camping.*

Other broader policies relate to the avoidance of inappropriate land uses and development which in general, echo the purpose of the Resource Management Act, of sustainable management.

*5.4 Papatūānuku - Ngā Paetae Objective 7 – Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.*

*P1.1 – The use of land in accordance with the principles of Ngāi Tahu, especially Ki Uta Ki Tai, recognising the relationship between healthy land, air and water.*

## 4.0 Issue Analysis

### 4.1 Evidence Base

The Council has reviewed the current District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification

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<sup>1</sup> <https://www.selwyn.govt.nz/recreation-And-facilities/parks-And-reserves/plans-and-policies/reserve-management-plans>

and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions. This advice includes the following:

<b>Title</b>	Baseline Assessment Report – Temporary Activities, Temporary Accommodation and Camping Grounds (DW018) (August 2018)
<b>Author</b>	Lisa Steele, Consultant Planner
<b>Brief Synopsis</b>	This report reviews the types of temporary activities undertaken within the Selwyn District including temporary accommodation and camping grounds. It analyses the current resource management approach within the Selwyn District Plan and that of neighbouring districts. This process has identified issues with the current approach and informed options and recommendations for addressing these.
<b>Conclusion</b>	This report recommended an alternative approach to the operative plan that recognised camping grounds as a specific activity and what locations are appropriate needs to be considered.
<b>Link to Document</b>	<a href="https://www.selwyn.govt.nz/_data/assets/pdf_file/0009/284643/8.APPENDIX-Temporary-activities-Final-Baseline-Report.pdf">https://www.selwyn.govt.nz/_data/assets/pdf_file/0009/284643/8.APPENDIX-Temporary-activities-Final-Baseline-Report.pdf</a>

<b>Title</b>	Preferred Option Report – Temporary Activities, Temporary Accommodation and Camping Grounds DW018 (October 2018)
<b>Author</b>	Lisa Steele, Consultant Planner
<b>Brief Synopsis</b>	This report provides a summary of issues and options for addressing temporary activities, temporary accommodation and camping grounds. It identifies a preferred option, which the DPC endorsed, to amend the definition, policies and rules to manage these activities and remove workers' temporary accommodation from the Plan.
<b>Conclusion</b>	That amended definitions, policies and rules be developed to manage camping grounds within the District.
<b>Link to Document</b>	<a href="https://www.selwyn.govt.nz/_data/assets/pdf_file/0007/285541/DW018_Temporary-activities-PreferredOption_Final-V2.pdf">https://www.selwyn.govt.nz/_data/assets/pdf_file/0007/285541/DW018_Temporary-activities-PreferredOption_Final-V2.pdf</a>

Since these reports were prepared, the Selwyn District Council has obtained existing use rights certificates for a number of camping grounds on Council owned reserves (Glentunnel Holiday Park, Kowai Pass, Waihora and Whitecliffs). A resource consent has also been granted for an additional 18 camp sites at the Rakaia Huts Camping Ground (RC195109).

It is also relevant to note that aside from camping grounds on Council or Doc managed sites, there is also a camping ground at Lake Coleridge (Harper River Campsite) which is located on land owned by Transpower.

## 4.2 Operative District Plan Provisions

This section provides an overview of the existing SDP provisions relating to camping grounds.

### *Definitions*

There is no definition of 'camping ground facilities' in the Township Volume which fall instead under the definition of 'visitor accommodation'.

Term	Definition
<b>Township Volume</b>	
<b>Visitor Accommodation</b>	means the use of land and buildings for transient accommodation offered on a daily tariff, except as provided for under the definition of a residential activity. Visitor accommodation may involve the sale of food and liquor to in-house guests.
<b>Rural Volume</b>	
<b>Camping Ground Facilities</b>	includes the use of any land, building or structure for the establishment or operation of a camping ground. Camping ground has the meaning set out in the Camping Ground Regulations 1985. <i>The Camping-Ground Regulations 1985 define camping ground as: camping ground means any area of land used, or designed or intended to be used, for rent, hire, donation, or otherwise for reward, for the purposes of placing or erecting on the land temporary living places for occupation, by 2 or more families or parties (whether consisting of 1 or more persons) living independently of each other, whether or not such families or parties enjoy the use in common of entrances, water supplies, cookhouses, sanitary fixtures, or other premises and equipment; and includes any area of land used as a camping ground immediately before the commencement of these regulations.</i>
<b>Travelling Accommodation</b>	means the use of land and buildings for temporary residential accommodation offered for a daily tariff which may involve the sale of liquor to in-house guests and the sale of food and liquor in conjunction with food to both the public and in-house guests. Travelling accommodation includes motels, holiday flats, motor and tourist lodges and hostels.

### Policy Framework

The Township Volume does not include any objectives or policies relating to camping grounds. The Rural Volume includes the following objective and policies:

<b>Rural Volume</b>	
<b>Objective B2.3.2</b>	The use of areas for recreation and camping, and camping facilities, and access to them will not detract from the amenity values or their surrounds.
<b>Policy B2.3.6</b>	Encourage camping ground facilities to be concentrated in specific defined areas around any lake, river, reserve or other recreational area.
<b>Policy B2.3.7</b>	Ensure any camping ground facility is located, designed and operated in a way that maintains or enhances the amenity values of the area, and protects any ecological, cultural, heritage or outstanding landscape values on or around the site.

The explanation and reasons for the objective and policies recognise that camping ground facilities should maintain the amenity values of the surrounding area as these attract people to these areas in the first instance. The impact of these facilities is reduced when they are concentrated in one or two areas, rather than scattered around the whole of a lake edge or reserve. The issues section within the Rural Volume further states that 'The District Plan does not prevent camping in the rural area, instead the current provisions manage the development of 'camping ground facilities' to ensure potential effects on the environment are addressed'<sup>2</sup>.

<sup>2</sup> Rural Volume, Chapter B2.3 Community Facilities and Recreational Areas - Issues

### Rules Package

The rules relating to camping grounds across each of the three types of zones in the two volumes are outlined below.

Zone	Activity Status
<b>Rural</b>	Camping ground facilities are a listed discretionary activity in all Rural Zones (Rule 9.2.1.5) except for Port Hills, Malvern Hills and High Country Zones where they are a non-complying activity (Rule 9.3.2).
<b>Living</b>	Visitor Accommodation is permitted subject to compliance with the standards for non-residential activities.
<b>Business</b>	Visitor Accommodation is permitted in the Business 1 zone subject to compliance with the built form standards. Visitor Accommodation is a Discretionary activity in Business 2 and 2A zones and when provided at ground floor level in Precincts 1 (Core Retail) and 8 (Community Anchor/Town Square) of Key Activity Centres.

### 4.3 Analysis of Surrounding Local Authorities

The approaches to the camping grounds in the four surrounding districts (Ashburton, Christchurch, Hurunui and Waimakariri) are outlined below. New camping grounds within Rural Zones were generally a discretionary activity under all Plans surveyed. This activity status applied through either listing camping grounds or visitor accommodation as discretionary activities in the respective zone chapter, or as a default rule for unspecified activities.

District	Definition	Activity Status
<b>Ashburton</b>	'Camping ground' means any area of land used, or designed or intended to be used, for rent, hire, donation, or otherwise for reward, for the purposes of placing or erecting on the land temporary living-places e.g. tents or caravans, for occupation by 2 or more families or parties (whether consisting of 1 or more persons) living independently of each other, whether or not such families or parties enjoy the use in common of entrances, water-supplies, cookhouses, sanitary fixtures, or other premises and equipment.	<ul style="list-style-type: none"> <li>- Discretionary activity in the Rural A, B and C Zones</li> <li>- Discretionary activity in Residential Zones (as not otherwise listed)</li> <li>- Non-complying in Business Zones (as not otherwise listed)</li> </ul>
<b>Christchurch</b>	Included in definition of 'guest accommodation'. Guest accommodation means the use of land and/or buildings for transient residential accommodation offered at a tariff, which may involve the sale of alcohol and/or food to in-	<ul style="list-style-type: none"> <li>- Camping grounds restricted to tents in associated with walking and cycle tracks (as a Rural Tourism Activity) is Permitted in the Rural Banks Peninsula Zone.</li> <li>- Restricted Discretionary activity in Residential Small Settlement Zone</li> <li>- Discretionary activity in Residential Banks Peninsula Zone</li> <li>- Guest accommodation in specific camping grounds is</li> </ul>

	house guests, and the sale of food, with or without alcohol, to the public. It may include the following ancillary activities: offices; meeting and conference facilities; fitness facilities; and the provision of goods and services primarily for the convenience of guests. Guest accommodation includes hotels, resorts, motels, motor and tourist lodges, backpackers, hostels and camping grounds. Guest accommodation excludes bed and breakfasts and farm stays.	permitted in the Open Space Community Park Zone
<b>Hurunui</b>	N/A	Camping grounds are not included in the definition of 'visitor accommodation' which only applies to buildings used to accommodate visitors. Thereby only permitted if comply with the relevant standards within each zone.
<b>Waimakariri</b>	Included in the definition of 'non-permanent accommodation'. Non-Permanent Accommodation means the use of a building or area within a building for the day to day accommodation of tourists and short-stay visitors. For the purposes of this definition double rooms and powered van sites are counted as one single non-permanent accommodation unit.	The District Plan makes no specific provision for this type of activity. The activity would therefore be restricted discretionary, discretionary or non-complying depending on the standards within each zone.

#### 4.4 RMA First Schedule Consultation

The RMA requires councils to undertake pre-notification consultation with those parties identified in Schedule 1, clause 3, during the preparation of a proposed district plan. These parties include:

- the Minister for the Environment;
- those other Ministers of the Crown who may be affected by the proposed plan;
- local authorities who may be so affected; and
- the tangata whenua of the area who may be so affected, through iwi authorities.

As a result of this consultation, written feedback was received from Christchurch City Council, Environment Canterbury and Department of Conservation. An overview of their feedback and a summary of recommended amendments to draft provisions is contained in a report that was presented to the District Plan Committee on 18 March 2019, as per details below.

<b>Title</b>	First Schedule Consultation (March 2019)
<b>Author</b>	Justine Ashley, District Plan Review Project Lead, with input from Topic Leads, Selwyn District Council
<b>Brief Synopsis</b>	This report provides a summary of the pre-notification feedback received from RMA First Schedule consultation on the draft Proposed District Plan provisions and the subsequent amendments recommended by Topic Leads.
<b>Link to Document</b>	<a href="https://www.selwyn.govt.nz/_data/assets/pdf_file/0008/352196/First-Schedule-Consultation-Report-to-DPC.pdf">https://www.selwyn.govt.nz/_data/assets/pdf_file/0008/352196/First-Schedule-Consultation-Report-to-DPC.pdf</a>

#### 4.5 Iwi Authority Advice

Clause 4A of Schedule 1 of the RMA sets out the specific requirements for local authorities to consult with iwi authorities before notifying a proposed plan and to have particular regard to any advice received from those iwi authorities. Access to the draft ePlan and Planning Maps was provided to the iwi authority (Te Rūnanga o Ngāi Tahu) on 17 December 2019 and feedback was invited until 28 February 2020. While no formal response was received from the iwi authority during this pre-notification consultation period, Te Rūnanga o Ngāi Tahu had previously indicated that they were satisfied that Mahaanui Kurataiao Limited were providing the necessary input into draft provisions on behalf of Te Taumutu Rūnanga and Ngāi Tūāhuriri Rūnanga. In addition, the detailed feedback that has been provided by Te Taumutu Rūnanga Advisory Group is also acknowledged in this context.

The site of the Rakaia Huts camping ground is located within a Wāhi Taonga Management Area. Wāhi Taonga Areas are large areas which contain many Wāhi Taonga Sites. The site is referenced as C39 (a) within the SDP which is described as a 'Rakaia River Moa Hunter Site' and 'Archaeological Site' and is of considerable cultural and archaeological significance.

The site is managed under the Rakaia Huts Conservation Plan' (subject to the Heritage New Zealand Pouhere Taonga Act 2014) which notes the requirements to obtain authority before undertaking development works.

#### 4.6 Stakeholder Feedback

Through the development of the proposed provisions, the Council undertook the following consultation and engagement specifically on this matter. Feedback on the first draft of Section 32 Report and Plan Provisions has been received from a number of organisations and agencies. This is summarised below.

##### **Department of Conservation (DoC)**

A considerable area of inland Selwyn District is managed by the Department of Conservation. The Department facilities in Selwyn District, apart from huts, are simple campsites which are managed under the Arthurs Pass National Park Plan and Canterbury (Waitaha) Conservation Management Strategy. If Council includes the definition of camp site as that for a camping ground, the Department suggests that for an expansion of an existing camping ground that it includes as a matter for discretion – consistency with management plan or strategy prepared under the Conservation Act or any other Act specified in the First Schedule. Such an approach would also manage expansion of camping grounds on Reserves managed by Council. Secondly, with regard to the proposed non-complying test, it is suggested that Council include a policy to ensure where relevant that any new camping ground is consistent with the relevant provisions of any management plan or strategy.

### **Selwyn District Council – Internal comments**

Camping grounds are regulated under the Reserves Act, Camping-Ground Regulations (Health Act), RMA and Freedom Camping Act. The proposed definition should reflect the Camping Ground regulations i.e. a camping ground where a fee is paid (including a donation). This would then differentiate between paid camping and freedom camping which is covered under the Freedom Camping legislation. The current rules are considered to be too restrictive and will require consent to be obtained for activities that will not result in inappropriate adverse effects on the environment. An alternative would be to provide for camping as a permitted activity with a permitted activity standard linked to there being a Reserve Management Plan prepared under the Reserves Act where that management plan provides for camping areas.

### **4.7 Summary of Issue Analysis**

The existing SDP provisions in the Rural Zone are relatively stringent, requiring all camping ground facilities to obtain resource consent. As many of these facilities have existing use rights, this is likely the reason that few resource consents have been required under this Plan.

There are several other key pieces of legislation which control the effect of camping grounds including the Reserves Act, Camping-Ground Regulations (Health Act) and Freedom Camping Act. Updating the provisions to reflect and reduce duplication with these requirements, will in turn prevent unnecessary consenting costs. This change is not considered to increase the potential for adverse effects to arise, particularly given the sensitivity of some of these areas which will be addressed in other SDP rules.

## 5.0 Scale and Significance Evaluation

The level of detail undertaken for the evaluation of the Proposed District Plan provisions has been determined by an assessment of the scale and significance of the implementation of these provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions. In making this assessment regard has been had to the following, namely whether the provisions:

	Low	Low-Moderate	Moderate	Moderate-High	High
Degree of change from the Operative Plan		✓			
Effects on matters of national importance (s6 RMA)	✓				
Scale of effects – geographically (local, district wide, regional, national)				✓	
Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?)			✓		
Scale of effects on those with particular interests, e.g. Tangata Whenua	✓				
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice?	✓				
Likelihood of increased costs or restrictions on individuals, businesses or communities.	✓				

The level of detail of analysis in this report is low. This is because the degree of change and effect are small and therefore the overall impact is small. The matter is not explicitly directed by higher order documents though generally covered in the CRPS.

## 6.0 Proposed Objective

This section of the report evaluates the proposed objectives as to whether they are the most appropriate to achieve the purpose of the Act.

## 6.1 Strategic Objectives

The strategic objectives that are of particular relevance to the camping grounds sub-section include:

- *SD-DI-O1 – Sensational Selwyn*
- *SD-DI-O2 – District Well-being and Prosperity*
- *SD-DI-O3 – Integration of Land Use, Ecosystems and Water – Ki Uta Ki Tai*
- *SD-DI-O4 – Our Environment*
- *SD-IR-O3 – Natural Hazards*

## 6.2 Evaluation of Proposed Objective

The current operative plan contains the following objective within the rural volume. **Objective B2.3.2** - The use of areas for recreation and camping, and camping facilities, and access to them will not detract from the amenity values or their surrounds.

The introduction of a specific Camping Ground objective is only required if the proposed land-use objectives are not appropriate.

### Proposed Land Use Objectives

Objectives	
<b>Residential – General</b>	<p><b>Objective 1</b> - Safe, convenient, pleasant, and healthy living environments that meet the needs and preferences of the community.</p> <p><b>Objective 6</b> - The role, function, and predominant character of the residential zones is not compromised by non-residential activities.</p> <p><b>Objective 7</b> - Residents have access to a range of community, recreation, education, health, and corrections activities and facilities that support, maintain, and enhance the surrounding residential amenity.</p>
<b>Large Lot Residential Zone</b>	<p><b>Objective 1</b> – The Large Lot Residential Zone provides for residential activity on large sites, in a manner compatible with the retention of an open and spacious peri-urban character at the rural interface.</p>
<b>Low Density Residential Zone</b>	<p><b>Objective 1</b> – The Low Density Residential Zone provides for residential activity and is characterised by low density and spacious housing typologies consistent with a suburban character.</p>
<b>General Residential Zone</b>	<p><b>Objective 1</b> – The General Residential Zone provides a quality, urban residential amenity and a range of residential unit typologies to meet the diverse needs of the community, at higher densities than anticipated in all other residential zones.</p>
<b>Settlement Residential Zone</b>	<p><b>Objective 1</b> – The Settlement Zone provides primarily for suburban residential activities and small-scale non-residential activities that serve the needs of the local community.</p>
<b>General Rural Zone</b>	<p><b>Objective 1</b> – Subdivision, use, and development in rural areas that:</p> <ol style="list-style-type: none"> <li>1. supports, maintains, or enhances the function and form, character, and amenity value of rural areas;</li> <li>2. prioritises primary production, over other activities to recognise its importance to the economy and wellbeing of the district;</li> <li>3. allows primary production to operate without being compromised by reverse sensitivity; and</li> </ol> <p>retains a contrast in character to urban areas.</p>
<b>Commercial – General</b>	<p><b>Objective 1</b> – The 'Commercial and Mixed Use Zones' provide for the District's commercial needs based on a hierarchy that has the Town</p>

	Centre Zone as the prime commercial and community focal point, supported by the Local Centre Zone, Neighbourhood Centre Zone, and Large Format Retail Zone..
<b>Neighbourhood Centre Zone</b>	<b>Objective 1</b> – The Neighbourhood Centre Zone provides for small-scale commercial activities and community activities that service needs of residents in the surrounding area..
<b>Local Centre Zone</b>	<b>Objective 1</b> – The Local Centre Zone provides primarily for commercial and community activities that service the convenience needs of residents of the town and the surrounding rural area.
<b>Large Format Retail Zone</b>	<b>Objective 1</b> – The Large Format Retail Zone provides primarily for retail activities with large floor or yard areas.
<b>Town Centre Zone</b>	<b>Objective 1</b> – The Town Centre Zone is the primary focus for commercial activities within the District and provides a diverse range of commercial activities, along with recreation, cultural and community activities and civic services, with associated residential activity.
<b>General Industrial Zone</b>	<b>Objective 1</b> – The General Industrial Zone contains a range of industrial and other compatible activities, as well as activities that support the functioning of industrial areas. <b>Objective 2</b> – The amenity values of residential and rural areas adjoining the General Industrial Zone are maintained, while recognising the functional and operational requirements of industrial activities.
<b>Dairy Processing Zone</b>	<b>Objective 1</b> – Dairy processing activities and facilities are recognised as important infrastructure which contributes to the economic vitality and wellbeing of the district and region, while managing their adverse effects.
<b>Grasmere Zone</b>	<b>Objective 1</b> – Grasmere is a unique development with a mix of tourism and residential activities that recognise Grasmere’s historical significance and the values of the surrounding natural environment.
<b>Knowledge Zone</b>	<b>Objective 1</b> – The Knowledge Zone contributes to the social and economic wellbeing of the District, region and nation by providing primarily for tertiary education and research activities. . <b>Objective 2</b> – The scale and proportion of buildings and spaces in the Knowledge Zone reflects the characteristics of high density education and research facilities, including associated accommodation activities.
<b>Maori Purpose Zone</b>	<b>Objective 1</b> – Ngai Tahu mana whenua are able to use and develop Māori land to provide for their economic, social, and cultural wellbeing; and are able to exercise rangatiratanga and kaitiakitanga to the fullest extent practicable; while: 1. adverse effects on the health and safety of people and the natural environment are avoided or mitigated; and the use and development of land for rural activities is enabled, while maintaining its amenity values.
<b>Port Zone</b>	<b>Objective 1</b> – Recognise and provide for the strategic importance of inland ports and their contribution to the social and economic wellbeing of the District.
<b>Porters Ski Zone</b>	<b>Objective 1</b> – The Porters ski and recreation area is a high-quality year-round tourist destination that provides for a range of alpine and outdoor recreation activities supported by an alpine village.
<b>Terrace Downs Zone</b>	<b>Objective 1</b> – Terrace Downs is a high quality development that provides a mix of tourism, recreational, and residential activities that integrates with and protects the surrounding natural environment.

General Direction Options and Recommendations	
<p>1. Rely on proposed Land-Use Objectives</p> <p>2. Provide a specific objective</p> <p>Option 1 is the preferred option. It is considered most likely to address the key resource management issues identified above and give effect to the relevant statutory planning documents.</p>	
Objective Most Appropriate Way to Achieve the Purpose of the RMA	
Proposed Objective	Summary of Evaluation
Rely on land-use objectives outlined above	<p>The objective is considered the most appropriate way to achieve the purpose of the Act because it:</p> <ul style="list-style-type: none"> <li>• Promotes the sustainable management of natural and physical resources by minimising adverse effects on the environment.</li> <li>• addresses the identified resource management issue;</li> <li>• supports the Strategic Objectives;</li> <li>• realistically able to be achieved within the Council's powers, skills and resources; and</li> <li>• Achieves the outcomes sought in S6, S7, and S8 of the Act, notably has regard for 7(b) the efficient use and development of natural and physical resources, 7(c) the maintenance and enhancement of amenity values, 7(f) the maintenance and enhancement of the quality of the environment, and 7(g) the finite characteristics of natural and physical resources.</li> <li>• Supports Council bylaw's relating to council owned camping grounds</li> </ul>
Status Quo	Summary of Evaluation
XZ-OX - Camping ground facilities provide people with opportunities for alternative accommodation in close proximity to recreational areas.	<p>The proposed objective seeks to identify the positive use of camping grounds while providing a balance of the potential effects on the environment. This will apply to the whole district not just the rural area.</p> <p>This objective is not preferred as the most appropriate way to achieve the purpose of the Act because it is less effective in achieving outcomes as it potentially creates unnecessary complexity.</p>

## 7.0 Evaluation of Proposed Policies, Rules, and Methods

This section is only required if there is no appropriate policy covering these types of activities.

The current operative plan contains the following policies within the rural volume. **Policy B2.3.6** - Encourage camping ground facilities to be concentrated in specific defined areas around any lake, river,

reserve or other recreational area. **Policy B2.3.7** - Ensure any camping ground facility is located, designed and operated in a way that maintains or enhances the amenity values of the area, and protects any ecological, cultural, heritage or outstanding landscape values on or around the site.

## 7.1 Summary of Issues

Issue 1 – Camping grounds help people experience the outdoors, however, these activities can affect the surrounding environment.

## 7.2 Quantification of benefits and costs

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

Given the assessment of the scale and significance of the proposed changes in Section 4 above, it is considered that quantifying costs and benefits would add significant time and cost to the s32 evaluation processes, which does not correspond to the scale and significance. Therefore exact quantification of the benefits and costs in this report was not considered necessary, beneficial or practicable. Rather, this report identifies where there may be additional cost(s) and focuses on identifying costs and benefits.

## 7.3 Policies and Rules relating to Issue

### Summary of Policies

Policies	
<b>Residential – General</b>	<b>Policy 1</b> – Enable a range of housing types and densities that achieve the residential character anticipated for each zone.
<b>Large Lot Residential Zone</b>	<b>Policy 1</b> – Provide for a very low density and spacious residential character by: <ol style="list-style-type: none"> <li>managing the density of development; and</li> <li>managing the height, bulk and form of development.</li> </ol>
<b>Low Density Residential Zone</b>	<b>Policy 1</b> – Enable activities that support and maintain a suburban character by managing the number of residential units that can be accommodated on each site and requiring: <ol style="list-style-type: none"> <li>a generally low rise built form consisting of single and two storey detached residential units; and</li> </ol> appropriate levels of openness around residential units which provides for residents on-site amenity. .
<b>General Residential Zone</b>	<b>Policy 1</b> – Enable residential development which provides a range of housing typologies that are consistent with a compact urban character by managing the density of development and the scale and on-site amenity of the built form.
<b>Settlement Residential Zone</b>	<b>Policy 2</b> – Non-residential development are of a scale and function consistent with the role of the township as a local service centre supplying a range of goods and services to the local community, the surrounding district and visitors to the area.
<b>General Rural Zone</b>	<b>Policy 4</b> – Provide for the economic development potential of the rural area by enabling a range of activities that: <ol style="list-style-type: none"> <li>have a direct relationship with, or are dependent on, primary production;</li> </ol>

	<ol style="list-style-type: none"> <li>2. have a functional need, or operational need to locate in the rural area;</li> <li>3. represent an efficient use of natural and physical resources; and</li> <li>4. maintain or enhance the character and amenity values of the surrounding area.</li> </ol> <p><b>Policy 5</b> – Avoid the establishment or expansion of any industrial activity or commercial activity where the scale of the activity is greater than that of a rural home business, unless the activity has a functional need, or operational need to locate within the rural area.</p>
<b>Commercial – General</b>	<p><b>Policy 1</b> – Avoid activities locating within any 'Commercial and Mixed Use Zone' that are incompatible with the character and function of that zone; and where located in a Local Centre, Large Format Retail, or Neighbourhood Centre Zone are of a scale or nature that would adversely affect the viability and function of the Town Centre Zone, including individual and cumulative adverse distributional and urban form effects.</p> <p><b>Policy 2</b> – Enable low density commercial and retail activities in commercial zones that contribute to the function, amenity, and vitality of the zone.</p>
<b>Neighbourhood Centre Zone</b>	<p><b>Policy 1</b> – Enable a limited range and scale of commercial activities, visitor accommodation, and community facilities.</p>
<b>Local Centre Zone</b>	<p><b>Policy 1</b> – Enable a range of commercial, visitor accommodation, recreational, cultural, community activities, and public amenities to establish and operate within the Local Centre Zone, provided that they are of a scale and nature that does not detract from the role and function of the Town Centre Zone.</p>
<b>Large Format Retail Zone</b>	<p><b>Policy 3</b> – Avoid compromising the function, role and vitality of the Town Centre Zone beyond those effects ordinarily associated with trade effects on trade competition by managing the scale and type of commercial activities, visitor accommodation, and community activities within the Large Format Retail Zone.</p>
<b>Town Centre Zone</b>	<p><b>Policy 1</b> – Enable a range of commercial activities, visitor accommodation, recreational, cultural, community activities, and public amenities to establish and operate within the Town Centre Zone.</p>
<b>General Industrial Zone</b>	<p><b>Policy 2</b> – Provide for other activities to establish and operate within the General Industrial Zone where they are:</p> <ol style="list-style-type: none"> <li>1. of a similar scale and nature to industrial activities; or</li> <li>2. ancillary to the main industrial activity on site; or</li> <li>3. necessary to support the needs of workers within the zone.</li> </ol> <p><b>Policy 3</b> – Avoid activities that are incompatible with the character and function of the industrial area.</p> <p><b>Policy 4</b> – Avoid commercial activities that will undermine the viability and function of the Town Centre and Local Centre Zones.</p>
<b>Dairy Processing Zone</b>	<p><b>Policy 2</b> – Manage the adverse effects of dairy processing activities and facilities by ensuring:</p> <ol style="list-style-type: none"> <li>1. activities that are not associated with the processing of milk are avoided in the Dairy Processing Zone, unless ancillary to dairy processing activities and facilities or a specified rural activity;</li> <li>2. development within the Dairy Processing Zone is in accordance with the relevant Outline Development Plan;</li> </ol> <p>specific development controls apply to minimise adverse effects beyond the Dairy Processing Zone.</p>

<b>Grasmere Zone</b>	<p><b>Policy 1</b> – Avoid use and development where it does not comply with the outline development plan, shown in Schedule 1 or the anticipated development within the Sub-Areas.</p> <p><b>Policy 2</b> – The development of the lodge and associated buildings for tourism and accommodation activities are developed and designed in a manner that complements the character of the natural environment and existing lodge within the tourist accommodation area shown on the outline development plan, shown in Schedule 1.</p>
<b>Knowledge Zone</b>	<p><b>Policy 2</b> – Provide for activities within the Knowledge Zone which are compatible with, and support tertiary education and research activities.</p> <p><b>Policy 3</b> – Avoid activities that:</p> <ol style="list-style-type: none"> <li>1. are incompatible with the efficient and effective operation of tertiary education and research activities; or</li> <li>would undermine the viability and function of the Lincoln Town Centre.</li> </ol>
<b>Maori Purpose Zone</b>	<p><b>Policy 1</b> – Enable use and development of Māori land for kāinga nohoanga, in accordance with tikanga Māori, to support the aspirations of manawhenua to live and work on Māori land.</p> <p><b>Policy 2</b> – Require land use and development for kāinga nohoanga to be undertaken in a way that:</p> <ol style="list-style-type: none"> <li>1. integrates land use and infrastructure;</li> <li>2. supports tikanga and matauranga values, identity, relationship with the environment, and characteristics of the location;</li> <li>3. recognises the cultural values of Māori Purpose Zoned land, including land not held in Māori ownership; and</li> <li>4. maintains the amenity values of adjoining general and rural land and minimises the potential for reverse sensitivity effects on existing rural activities.</li> </ol> <p><b>Policy 4</b> – Enable rural activities in a manner consistent with the provisions of the Rural Chapter.</p>
<b>Port Zone</b>	<p><b>Policy 2</b> – Provide for other industrial activities within the Port Zone, where such activities do not adversely affect port activities.</p> <p><b>Policy 3</b> – Avoid activities locating within the zone that would adversely effect the efficient operation of port activities, including those likely to result in reverse sensitivity effects.</p>
<b>Porters Ski Zone</b>	<p><b>Policy 1</b> – Avoid ongoing use and development of the Porters ski and recreation area where it does not comply with the outline development plans, shown in Schedule 1 or the anticipated development within the Sub-Areas, including staging.</p> <p><b>Policy 2</b> – Manage the establishment of an alpine village within the Village Base Sub-Area shown on the Outline Development Plan in Schedule 1, for accommodation, community, and commercial activities whilst ensuring the layout, design, and development of the alpine village complements the landscape values of the locality.</p>
<b>Terrace Downs Zone</b>	<p><b>Policy 1</b> – Avoid use and development where it does not comply with the outline development plan, shown in Schedule 1 or the anticipated development within the Sub-Areas.</p> <p><b>Policy 2</b> – Enable the development of tourism, hospitality, and accommodation activities within the Tourist Accommodation Sub-Area shown on the outline development plan in Schedule 1.</p>

<b>Provisions (Policy, Rule, Method) Most Appropriate Way to Achieve the Objectives</b>	
<p>Relevant objective(s): General land-use objectives.</p> <p>Summary of the proposed policies, rules, definitions and assessment matters that give effect to the objective(s) relevant to this issue:</p> <ul style="list-style-type: none"> <li>• General land-use policies.</li> <li>• Rules that manage camping grounds.</li> <li>• Definition for camping grounds.</li> </ul>	
<b>Efficiency and Effectiveness</b>	
Benefits	Costs
<p>Environmental: There can be recognition and protection of the natural environment as part of the development.</p>	<p>Environmental: Development, at any scale, can have potential adverse impact on an environment, if not appropriately controlled.</p>
<p>Economic: The provisions allow for some tourism that can increase economic activity in that area.</p>	<p>Economic: none identified</p>
<p>Social: The provisions allow for access and enjoyment for the public of environments</p>	<p>Social: If inappropriately located and controlled, camping grounds can adversely impact the urban character and amenity of a neighbourhood.</p>
<p>Cultural: none identified</p>	<p>Cultural: There is potential adverse effect if the land is used without consideration of the cultural value.</p>
<b>Summary of Efficiency Assessment</b>	
<p>The environmental, social, and cultural benefits outweigh the identified environmental costs by limiting the location of camping grounds.</p>	
<b>Effectiveness Assessment</b>	
<p>The proposed provisions are considered to be the most effective means of achieving the objective as together they will:</p> <ul style="list-style-type: none"> <li>• ensure the adverse effects are managed appropriately through limiting the location of camping grounds.</li> <li>• enable the Council to effectively administer its District Plan and to monitor the outcomes of the proposed provisions in a clear and consistent manner.</li> </ul>	
<b>Options less or not as appropriate to achieve the objective(s)</b>	
<p><b>Option 1: Specific Policies</b></p> <p>The proposed approach has two policies that ensure the camping ground considers the surrounding environment and that the positive benefits of camping grounds is recognised.</p>	<p><b>Appropriateness</b></p> <p>Providing specific policies is not considered the most appropriate way in which to achieve the objective because they would continue the issue identified in this report, and are therefore ineffective.</p>

<p>XZ-PX Ensure any camping ground facility is located, designed and operated in a way that maintains or enhances the amenity values of compatible areas, and protects any ecological, cultural, heritage or outstanding landscape values on or around the site.</p> <p>XZ-PY Recognise the economic and social benefits that camping grounds facilities can provide the district, and assist in enabling the potential benefits of these facilities for public access to streams and rivers, and recreation for the wider community.</p>	<p>The status quo does not consistently manage camping grounds across the district.</p>
<p><b>Risk of acting or not acting</b></p>	
<p>The Council has sufficient information to determine the provisions. As the Proposed Plan provisions are largely a streamlining of the Operative Plan provisions, the Council has a good understanding of the nature of the activities, their operational requirements, and their associated effects on the environment. Therefore, there is a low risk of acting in the manner proposed.</p>	

Table 1 – Proposed Rules

Policies	
<b>Large Lot Residential Zone</b>	Discretionary as Visitor Accommodation
<b>Low Density Residential Zone</b>	Permitted where it is provided through a Reserve Management Plan, Discretionary otherwise
<b>General Residential Zone</b>	Discretionary as Visitor Accommodation
<b>Settlement Residential Zone</b>	Permitted where it is provided through a Reserve Management Plan, Discretionary otherwise
<b>General Rural Zone</b>	Permitted where it is provided through a Reserve Management Plan, Discretionary otherwise
<b>Neighbourhood Centre Zone</b>	Non-complying
<b>Local Centre Zone</b>	Discretionary
<b>Large Format Retail Zone</b>	Non-complying as Visitor Accommodation
<b>Town Centre Zone</b>	Non-complying
<b>General Industrial Zone</b>	Non-complying
<b>Dairy Processing Zone</b>	Catch-All
<b>Grasmere Zone</b>	Permitted as Visitor Accommodation
<b>Knowledge Zone</b>	Discretionary as not meeting the Visitor Accommodation Standards
<b>Maori Purpose Zone</b>	Permitted through Rural Provisions
<b>Port Zone</b>	Non-complying as Noise Sensitive Activity
<b>Porters Ski Zone</b>	Non-complying as not meeting the Visitor Accommodation Standards
<b>Terrace Downs Zone</b>	Permitted as Visitor Accommodation

## Summary of Proposed Definitions

To help clarify the intent of the provisions and align with the National Planning Standards the following definitions have been introduced for:

- Camping Grounds - Is visitor accommodation that involves the use of any land, building or structure for the establishment or operation of a camping ground. Camping ground has the meaning set out in the Camping Ground Regulations 1985.

## 8.0 Conclusion

This evaluation has been undertaken in accordance with Section 32 of the Act in order to identify the need, benefits and costs arising from the District Plan Review relating to the camping ground provisions and the appropriateness of the current and proposed methods and rules having regard to their effectiveness and efficiency relative to other means in achieving the purpose of the Act.

This evaluation has determined that camping ground facilities are controlled by a number of regulations outside the District Plan. The District Plan should therefore seek to control those activities and effects which are not captured by this.

## Bibliography

The following publications have been reviewed in the context of this Section 32 Evaluation:

1. ADC 2014. Ashburton District Plan. An operative district plan, including operative plan changes. Prepared by Ashburton District Council, July 2017.
2. CCC 2017. Christchurch District Plan. An operative district plan including operative amendments. Prepared by Christchurch City Council, September 2018.
3. CRC 2013. Canterbury Regional Policy Statement 2013 – Revised February 2017. An operative Regional Policy Statement, including operative plan changes. Prepared by Canterbury Regional Council, September 2017.
4. HDC 2018. Hurunui District Plan. An operative district plan, including operative plan changes. Prepared by Hurunui District Council, June 2018.
5. MfE 2019. National Planning Standards. Ministry for the Environment, Publication No. ME 1394, April 2019.
6. Ngai Tahu 2013. Mahaanui Iwi Management Plan 2013. An iwi management plan published by Ngai Tahu Runanga, Te Hapu o Ngati Wheke (Rapaki), Te Runanga o Koukourarata, Onuku Runanga, Wairewa Runanga and Te Taumutu Runanga. February 2013.
7. SDC 2009. Rakaia Huts Conservation Plan. Prepared by Selwyn District Council, Te Taumutu Runanga and New Zealand Historic Places Trust.
8. SDC 2009a. Parks and Reserves Bylaw 2009. Prepared by Selwyn District Council, Came into force July 2009.
9. SDC 2016. Selwyn District Plan. An operative district plan including plan changes. Prepared by Selwyn District Council, June 2016.
10. SDC 2018a. Baseline Report – Temporary Activities, Temporary Accommodation and Camping Grounds (DW018). Prepared by Selwyn District Council, August 2018.
11. SDC 2018b. Preferred Option Report – Temporary Activities, Temporary Accommodation and Camping Grounds. Prepared by Selwyn District Council, October 2018.
12. WDC 2005. Waimakariri District Plan. An operative district plan, including operative plan changes. Prepared by Waimakariri District Council, October 2018.