

Canterbury

District Health Board

Te Poari Hauora o Waitaha

Submission on Proposed Responsible Freedom Camping Bylaw 2018

To: Hurunui District Council

Submitter: Canterbury District Health Board

Attn: Angela Sheat
Community and Public Health
C/- Canterbury District Health Board
PO Box 1475
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Proposal: The Council has reviewed its existing Freedom Camping Bylaw 2011 and is proposing to replace it with a bylaw under the Freedom Camping Act 2011.

SUBMISSION ON PROPOSED FREEDOM CAMPING BYLAW 2015

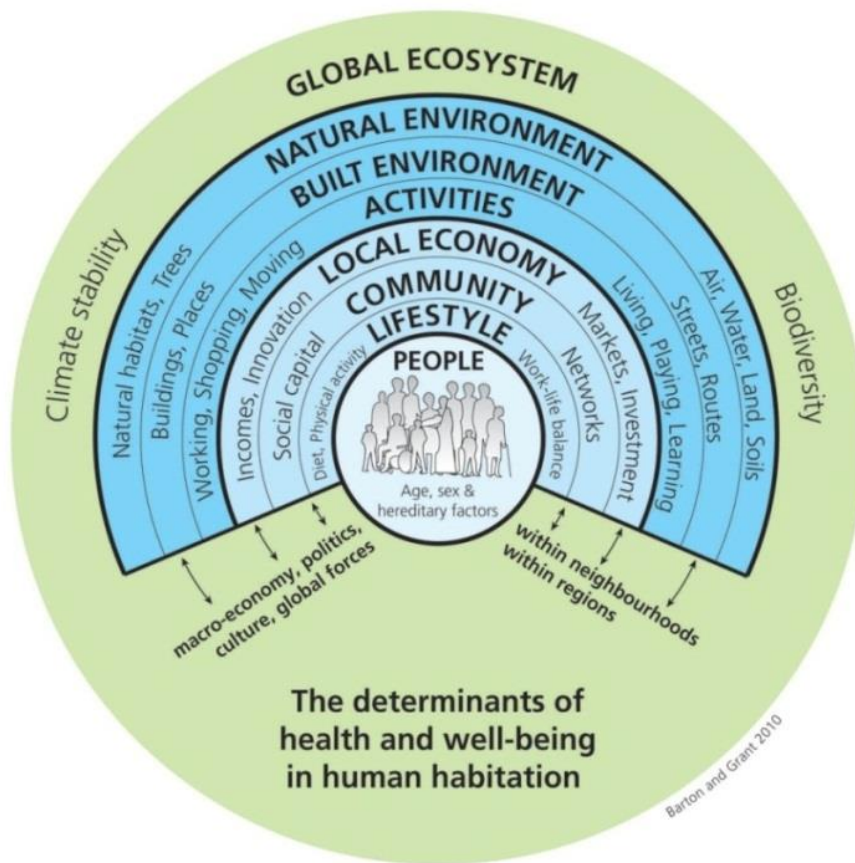
Details of submitter

1. Canterbury District Health Board (CDHB).
2. The submitter is responsible for promoting the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. These statutory obligations are the responsibility of the Ministry of Health and, in the Canterbury District, are carried out under contract by Community and Public Health under Crown funding agreements on behalf of the Canterbury District Health Board.
3. The Ministry of Health requires the submitter to reduce potential health risks by such means as submissions to ensure the public health significance of potential adverse effects are adequately considered during policy development.
4. We welcome the opportunity to comment on the Proposed Responsible Freedom Camping Bylaw 2018. The future health of our populations is not just reliant on hospitals, but on a responsive environment where all sectors work collaboratively.
5. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the 'social determinants of health'¹. The diagram² below shows how the various influences on health are complex and interlinked
6. The most effective way to maximise people's wellbeing is to take these factors into account as early as possible during decision making and strategy development. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact³.

¹ Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

² Barton, H and Grant, M. (2006) A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health* 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

³ McGinni s JM, Williams-Russo P, Knickman JR. 2002. *The case for more active policy attention to health promotion*. *Health Affairs*, 21(2): 78 - 93.



General Comments

7. The CDHB supports the proposal and has a number of recommendations for consideration which would further improve health outcomes for the community.

Specific comments

8. The CDHB notes that all restricted areas for non-self-contained freedom camping set out in Schedule Two either have on-site toilet facilities or are adjacent to toilet facilities. The CDHB fully supports this rule; non-self-contained freedom camping should not be permitted in any area that does not have toilet facilities.
9. The CDHB is concerned about sewage disposal from freedom campers in certified self-contained vehicles. The CDHB recommends clear signage directing campers to the nearest sewage disposal facilities.
10. The CDHB reminds Council of its responsibility to ensure proper litter disposal and removal from all freedom camping sites. Section 9(5) of the Litter Act 1979 states “Every public authority shall also make appropriate provision for the emptying of the contents of litter receptacles situated within public places under its control or in its district and for the removal and disposal of those contents. The work shall be executed promptly, efficiently, and at regular and prescribed intervals to the satisfaction of the Medical Officer of Health appointed for the health district in which the public place is situated.” The CDHB recommends that Council provides enough on-site rubbish bins in areas where freedom camping is allowed.
11. The CDHB is concerned about the availability of drinking water at designated freedom camping sites. The CDHB recommends clear signage directing campers, both certified self-contained and non-self-contained, to the nearest site for the refilling of potable water. Council should also ensure that other water sources which are not suitable for drinking, e.g. from taps in public toilet facilities, are clearly signed to warn campers that the water is not of drinking quality and should be boiled before use.

12. The CDHB recommends that all signage at freedom camping areas be legible, well-lit and in multiple languages. It is important that all information, especially relating to toilet facilities, sewage disposal and drinking water, is effectively relayed to campers in a manner that is easily seen and understood.

13. The CDHB reminds the Council that some people who freedom camp do not do so out of choice but because they are homeless. It is important that Council give careful consideration to the possible effects the proposed bylaw may have on homeless people, particularly:

- a) the length of stay restriction of a maximum of 2 nights in a 30 day period within the district, and;
- b) the increased inequality brought about by incurring financial penalties in respect to those experiencing homelessness.

Such clauses may also force homeless people from the district causing disconnect from their long standing social connections and support systems. Council may wish to take a sensitive approach, by linking homeless freedom campers with local services that can offer assistance with housing issues and ensure enforcement of the proposed bylaw does not contribute to the stigma and disconnect for local people who experience homelessness.

Conclusion

14. The CDHB does not wish to be heard in support of this submission.

15. Thank you for the opportunity to submit on the Proposed Responsible Freedom Camping Bylaw 2018.

Person making the submission



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Medical Officer of Health

Date: 27/06/2018

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