

23 July 2025

Ministry of Business, Innovation and Employment  
Emailed to: [responsiblecamping@mbie.govt.nz](mailto:responsiblecamping@mbie.govt.nz)

Dear Ministry Officials,

**Feedback from the Manawātū District Council on the council survey titled “review of freedom camping homelessness exemption**

Thank you for the opportunity to provide information to support your review of the Freedom Camping Homelessness exemption. Our responses to the survey questions are outlined below.

1. *Generally, have the 2023 changes to the Freedom Camping Act improved your council’s ability to manage freedom camping?*

No. The changes to the Freedom Camping Act have made the enforcement of our Freedom Camping Bylaw more difficult. Council is aware that some individuals have been promoting the claim of homelessness as a way to avoid infringements via online Freedom Camping Facebook groups. Enforcement Officers report that some individuals who are Freedom Camping now claim homelessness, which exempts them under the Act.

Since the changes, there has been an increase in people camping in self-contained only areas in non-self-contained-vehicles and tents, as well as an increase in the length of time individuals are staying in parks and reserves.

Compliance Officers report a case involving a person staying in a self-contained bus who was employed as an Engineer in town. When asked to move on, he said that he was homeless, which left Officers unsure of how to respond. In another instance, a person camping in a non-self-contained vehicle in a self-contained only area responded to Enforcement Officers by saying “I’m homeless, you can’t do anything to me.”

In addition to unhoused individuals camping in restricted areas and staying extended periods, Enforcement Officers have also observed the erection of semi-permanent structures and the keeping of animals in Council reserves. For example, one individual lived in a caravan on-site for an extended time and accumulated two cars and a motorbike, along with various semi-permanent structures. In another case, a person was camping in the same reserve with a range of animals, including dogs, chickens, and a miniature horse.

It is difficult for Enforcement Officers to enforce the maximum length-of-stay requirements of our Freedom Camping Bylaw when the same rules do not apply to those who are unhoused. Officers are perceived as behaving inconsistently when they ask someone who is Freedom Camping responsibly to move on, while someone camping next to them, claiming homelessness, stays beyond the maximum permitted period.

Enforcement Officers have limited ability to verify housing status due to privacy constraints. Consequently, individuals often stay at parks and reserves for extended periods. This has led to large groups forming in some reserves, creating disharmony (including concerns around public safety) within the local community, and causing frustration among compliant freedom campers.

2. *Does your council have an existing policy for managing homelessness (this policy need not exclusively be in relation to freedom camping)?*

No. Manawātū District Council (MDC) does not currently have a formal policy for managing unhoused persons. Instead, we adopt an education-first approach, which emphasises engagement and relationship building. Officers aim to offer support and encourage individuals to connect with social services that may be able to assist them.

MDC recognises that this informal approach may be insufficient as the visibility and complexity of homelessness in our community increases. A structured framework or policy response may be needed to guide our practices, ensure consistency, and clarify the role of Council in managing homelessness.

3. *Has the homelessness exemption affected your enforcement officers' ability to enforce the Freedom Camping Act 2011? If yes, explain how.*

Yes. The exemption has created a grey area for enforcement. Some individuals claim to be homeless in order to remain at certain sites or camp in areas where they would otherwise be prohibited.

Officers are cautious not to breach the Privacy Act when inquiring into a person's housing situation and have limited means to determine whether someone is genuinely unhoused. This makes it difficult to apply the rules consistently and fairly. The exemption places added pressure on Enforcement Officers, who are not trained social workers. Officers are being required to make complex judgements without the tools, training, or mandate to do so, which risks both legal liability and community dissatisfaction.

4. *How many individuals have you assessed as meeting the homelessness exemption within the Freedom Camping Act 2011?*

It is very difficult for us to provide an estimate on the number of individuals as we do not keep records of this, and the numbers fluctuate on a daily basis. On 22 July 2025, MDC's Compliance and Enforcement Officer estimated that there were 28 people who are (or claim to be) unhoused in and around feilding. This total does not include those living in rural reserves and village areas.

MDC is aware of a small number of individuals who have ongoing contact with Council staff. These individuals are generally compliant when concerns arise, and relationships have been built over time.

Council also knows of approximately five groups of unhoused people living permanently at Almadale Reserve. The groups consist of between one to six people. In recent months the number of groups of unhoused at Almadale was as high as 8 or 9.

Accommodation ranges from tents to caravans and motorhomes. There are currently five dogs at Almadale Reserve that belong to those living there. The number of dogs at the reserve fluctuates, and was previously much higher. Some of the larger groups have other people coming and going from the site, which makes it more difficult to establish who is living in the reserve permanently.

Almadale is one of the more remote rural reserves in the District, and the presence of these individuals is generally tolerated by the community. However, there have been instances of antisocial behaviour by unhoused individuals towards other people wishing to freedom camp at the reserve.

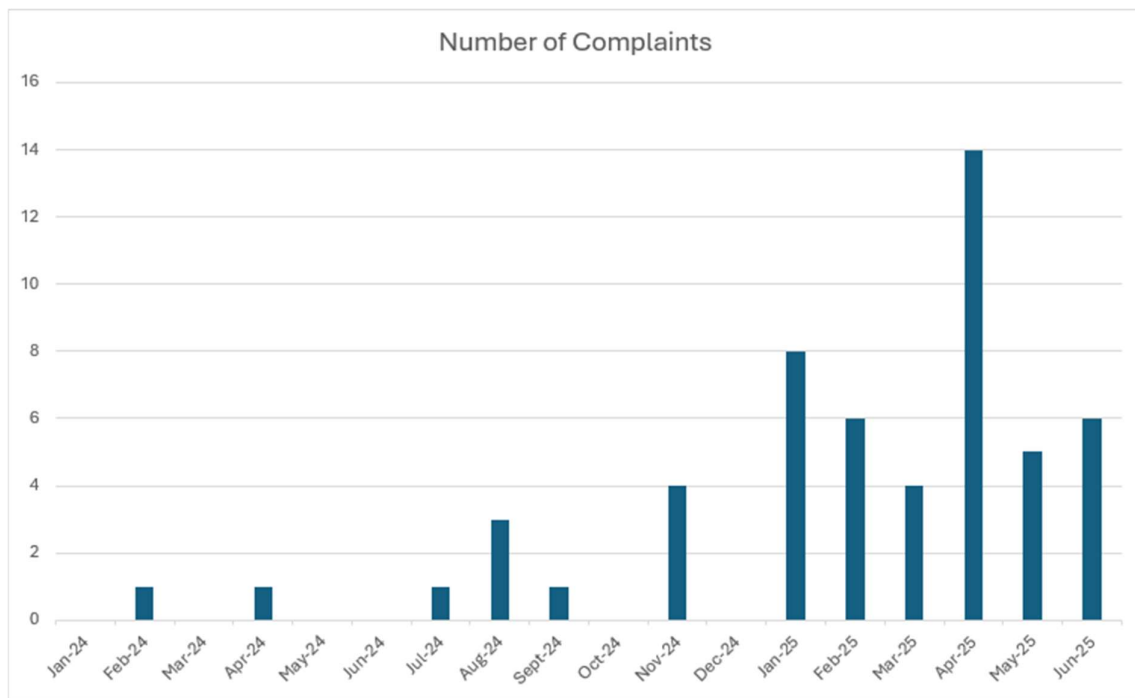
Timona Park – a centrally located reserve – has also become increasingly popular with the unhoused community. Council's Compliance and Enforcement Officer has reported that there has been a recent influx of cars, small vans, SUV's to Timona Park as well as an increase in tents on the river side of the road at Timona Park. He estimates that there are currently at least 14 cars, caravans and tents that are not self-contained and appear to be staying at Timona Park as long-term campers. The numbers vary frequently as people move between Almadale Reserve, Timona Park, or in and out of the District.

Council has just completed the statutory review of its Freedom Camping Bylaw, adopting the amended bylaw on 19 June 2025. This amended bylaw includes a designated area for non-self-contained vehicles at Timona Park, adjacent to the public toilet block. In designating an area for non-self-contained vehicles, Council is hopeful that we will be able to encourage these vehicles to co-locate adjacent to the public toilet facilities, rather than dispersed throughout the park. However, there is also a concern that this change may exacerbate the current conflicts between freedom campers and unhoused people living in non-self-contained vehicles at the park.

MDC is aware of a wider public perception that the presence of unhoused people living in our parks and reserves makes these places unsafe. Particular concerns have been raised regarding unhoused individuals living at Timona Park in proximity to children's playgrounds and sports fields. The keeping of dogs at reserves by unhoused individuals is also raising safety concerns. Many community members no longer walk their own dogs along the riverside track through Timona Park for that reason.

As the number of unhoused people living in these parks grows, the relationship between them, other community members, and Enforcement Officers is becoming increasingly strained. This is due to factors such as increased agitation with Officers who are visiting more frequently in response to public complaints, and a growing sense of assertiveness among some unhoused individuals regarding their right to remain on site. The figure below shows the number of complaints received by Council regarding unhoused persons in council parks and reserves from January 2024 to 30 June 2025.

Some individuals choose not to use alternative accommodation options such as local campgrounds or boarding houses, even when they are available. In these cases, it is unclear whether they meet the criteria for exemption under the Act. Without formal tools or access to relevant data, Council is unable to make consistent or confident assessments regarding a person's housing status.



5. *What operational approaches have you taken to assess whether an individual meets the requirements of section of 5(2A) of the Freedom Camping Act 2011?*

MDC Enforcement Officers adopt a relational approach – engaging in conversation with individuals to better understand their circumstances and needs. Privacy constraints and the absence of formal assessment criteria mean Officers are constrained in what they can ask.

Officers report that guidance suggesting they enquire into an individual’s personal or financial situation or review their social media is impractical. Most individuals they interact with are reluctant to provide even their name, let alone disclose sensitive personal details. Additionally, many do not have social media accounts, or if they do, their profiles are private or offer little usable information.

The lack of a structured assessment process makes it difficult to verify homelessness claims and leads to inconsistent decisions - often based on Officer discretion, perceived sincerity, or community tolerance. This variability risks undermining public confidence in Council’s enforcement practices.

We support the development of a formal verification mechanism or a shared tool to guide consistent, fair, and legally sound assessments across all councils.

6. *Does your council refer people who meet the homelessness exemption to social service agencies?*

*a. If yes, how many people have you referred?*

*b. If yes, how many social service providers do you work with?*

Yes. MDC continues to explore how best to support individuals who meet the homelessness exemption. At present, Officers will ask individuals if they are connected with any social services and may suggest they contact the Ministry of Social Development or Manchester House, a local social service provider. However, these interactions are highly dependent on how receptive individuals are to Officer engagement. Officers report that many people experiencing homelessness have a distrust of those in authority - particularly Enforcement Officers and in some cases, social services agencies.

While unhoused persons were relatively uncommon in our District a few years ago, things have now changed considerably to the point where we are now faced with societal issues that we cannot solve alone. We are in the initial stages of establishing regular hui with local social service providers to co-develop collaborative support pathways for unhoused individuals. While no formal referral process currently exists, our goal is to strengthen coordination and ensure that people are connected with appropriate support as early and effectively as possible.

Metropolitan councils may be better resourced to support unhoused individuals and have better access to social service support. There is one organisation, Te Wakahuia that has been working with unhoused individuals through the Manawatū Community Hub Libraries. Te Wakahuia are part of the He Piringa Whare, a working group consisting of various support agencies including Central Government that work with whanau to secure housing through Kainga Ora (in Palmerston North). Manchester House Social Services and the Christian Leaders Network, including the Salvation Army, provide unhoused people with food and supplies.

MDC is aware that several community organisations in the Manawatū District (including two iwi-based services providers) that have previously provided accommodation and support services have lost their funding or have had their services significantly retracted this financial year. The implications of these cuts will become more apparent over the next 12 months. MDC would like the Government to better resource smaller rural and provincial councils, and their own agencies (including the Ministry of Social Development) operating in these smaller centres to improve outcomes.

*7. Has your council issued any freedom camping infringements?*

No. MDC has not issued any freedom camping infringements in the past four years. One Enforcement Officer noted that, since beginning the role in 2016, they have issued approximately four infringements in total. Since the legislative changes, Officers report a high degree of uncertainty around how to apply the homelessness exemption, combined with a strong reluctance to risk unjustly penalising vulnerable individuals.

Previously, the Council's education-first approach had proven effective – particularly when paired with the ability to issue infringements where necessary. Before the legislative changes, the potential of infringement served as a valuable tool to encourage compliance with the Bylaw. Officers were often able to use this authority

- to prompt individuals to relocate to more appropriate sites (e.g., those with adequate sanitation facilities), comply with requirements (e.g., avoiding the erection of semi-permanent structures), or engage with MSD or other support services. With this enforcement tool now effectively removed, Officers have lost a key mechanism for encouraging responsible behaviour and supporting positive outcomes.
8. *What changes, if any, would you like to see to the Freedom Camping Act 2011 or Plumbers Gasfitters and Drainlayers Act 2006, in relation only to the homelessness exemption?*
- Introducing a clear legal definition of “homeless” under the Freed Camping Act 2011. For example, does refusing alternative accommodation or refusing to engage with housing service providers disqualify a person from the exemption?
  - Establishing a formal verification mechanism, such as a letter from MSD or a social housing provider, confirming an individual’s status as unhoused. This letter should have a defined validity period (e.g., three months) before requiring renewal. Enforcement Officers should have the authority to request to view this letter, similar to how they check for certified self-containment stickers.
  - Providing clear guidance on the presence of animals and the use of semi-permanent structures, and how these interact with the homelessness exemption.
  - Limiting the exemption to areas with access to adequate sanitation facilities, in order to uphold basic health and environmental standards.
  - Providing councils with clearer authority to balance compassionate responses with the need to uphold basic health and environmental standards.
  - Developing a national framework or toolkit to guide councils in assessing and responding to freedom camping involving unhoused individuals; ideally co-designed with local government and social sector agencies.
9. *Please provide any further comments or information regarding how the 2023 changes to the Freedom Camping Act (including the introduction of the homelessness exemption) affected homelessness.*

There are multiple and complex drivers contributing to the rise in homelessness. The exemption has not led to better support or experiences for unhoused persons within our District. Rather, it has complicated enforcement and contributed to growing tension between housed and unhoused members of the community. It has created operational challenges, contributed to public frustration, and blurred lines of accountability between local and central government.

The exemption removes the ability to require compliance with basic camping standards, such as the use of self-contained vehicles or camping near sanitation facilities, and in doing so, increases public health risk and social discord. Prior to the change in legislation, Enforcement Officers were able to use the Bylaw to direct unhoused individuals to relocate to reserves with facilities that better suit their needs (e.g., 24-hour toilet facilities). The changes to the legislation mean that unhoused individuals are locating in Council’s premier urban parks and reserves and Officers are not able to require them to relocate.

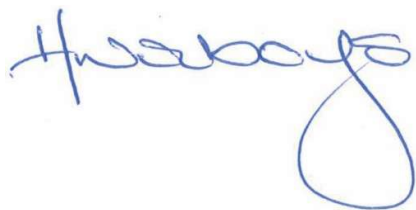
Enforcement Officers are being placed in difficult situations, expected to navigate unclear legal boundaries while responding to complex needs that fall outside the traditional scope of local government. Without adequate support, training, or guidance, the burden of managing homelessness continues to fall disproportionately on frontline Enforcement Officers.

Additionally, MSD or other central agencies could play a more active role in verifying homelessness status and supporting coordination between government and councils. This would reduce the risk of inconsistent treatment and help ensure that support is being directed where it is genuinely needed.

Another concern of MDC is that many unhoused individuals are choosing to live permanently in what used to be our premier freedom camping spots of Timona Park and Almadale Reserve. Their presence is deterring the type of domestic tourist we are trying to attract, and is impacting on our District's reputation as an attractive place to visit.

Please feel free to contact our Strategy Manager, Lisa Thomas (email: [Lisa.Thomas@mdc.govt.nz](mailto:Lisa.Thomas@mdc.govt.nz)) if you have any questions about our information.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Helen Worboys', with a large loop at the end.

Helen Worboys, JP  
**Mayor**