

**Te Pātaka o Rākaihautū  
Banks Peninsula Community Board  
MINUTES ATTACHMENTS**

**Date:** Monday 20 April 2026  
**Time:** 10:00 am  
**Venue:** Lyttelton Ōhinehau Community Boardroom,  
25 Canterbury Street, Lyttelton

<b>TABLE OF CONTENTS NGĀ IHIRANGI</b>	<b>PAGE</b>
<b>3.1. Deputations by Appointment - Pigeon Bay and Duvauchelle Campgrounds Report</b>	
A. Item 3.1 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	4
B. Item 3.1 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Tabled Documents Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	11
C. Item 3.2 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	28
D. Item 3.4 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	30
E. Item 3.9 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	37
F. Item 3.10 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	38
G. Item 3.11 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	40
H. Item 3.13 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	41
I. Item 3.14 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	45

J.	Item 3.15 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	46
K.	Item 3.17 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	49
L.	Item 3.18 Deputation Pigeon Bay and Duvauchelle Campgrounds – Annual Sites Presentation Notes Te Pātaka o Rākaihautū Banks Peninsula Community Board – 20 April 2026 .....	51



# Pigeon Bay Reserve A Remote Campsite Pigeon Bay

Annual Campsites at Pigeon Bay  
- Consultation

Presentation to the Banks Peninsula  
Community Board

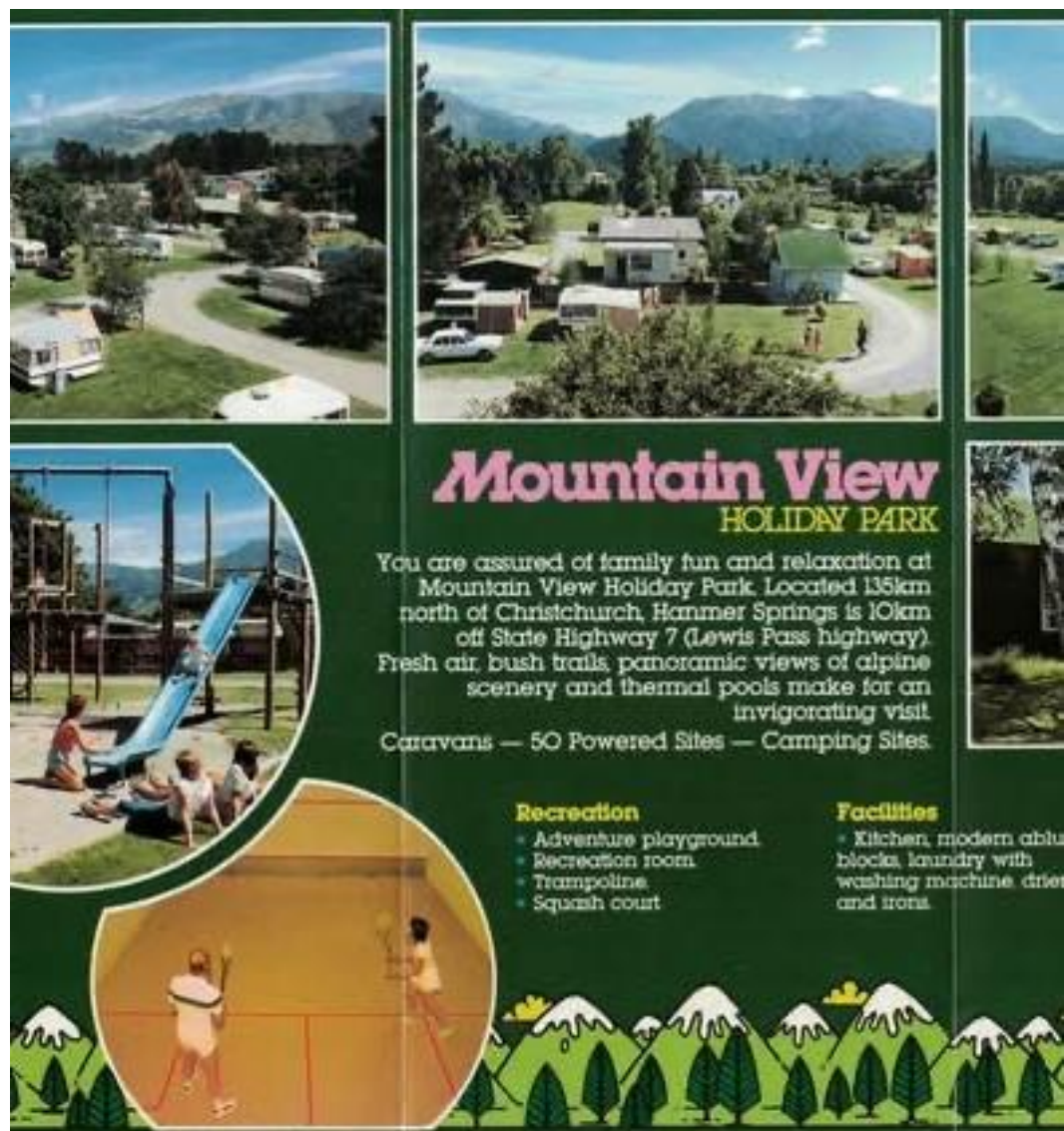
Lyttelton 20 April 2026



## Introducing

Pam Richardson

- Owned and operated , Mt View Holiday Park Hamner Springs 1970/ 80' s.
- President New Zealand Camp and Cabin Association.
- Part of the development team Top 10 Holiday Parks of New Zealand.
- Community Board 2007 to 2019 member and Chairman and Pigeon Bay Representative Reserve Committee.
- Pigeon Bay Reserve Committee appointed Community Board representative.
- Landowner Holmes Bay, Pigeon Bay.



## Pigeon Bay Reserve 74 Wharf Rd Pigeon Bay

- Pigeon Bay Reserve - a Reserve under the Reserves Act.
- A public Reserve, our Pigeon Bay community Reserve, our local playground.
- Management plan 2006 clearly outlines the rules and still appropriate for today.
- The reserve is not a place to store caravans long term.
- Caravans should be capable of being moved off site over the peak period.



## Pigeon Bay Reserve

Photo taken January 2026

- Annual campsites no occupants, adjacent to the photo above.
- Note decking and gear left out.
- Annual Sites along the waters edge.



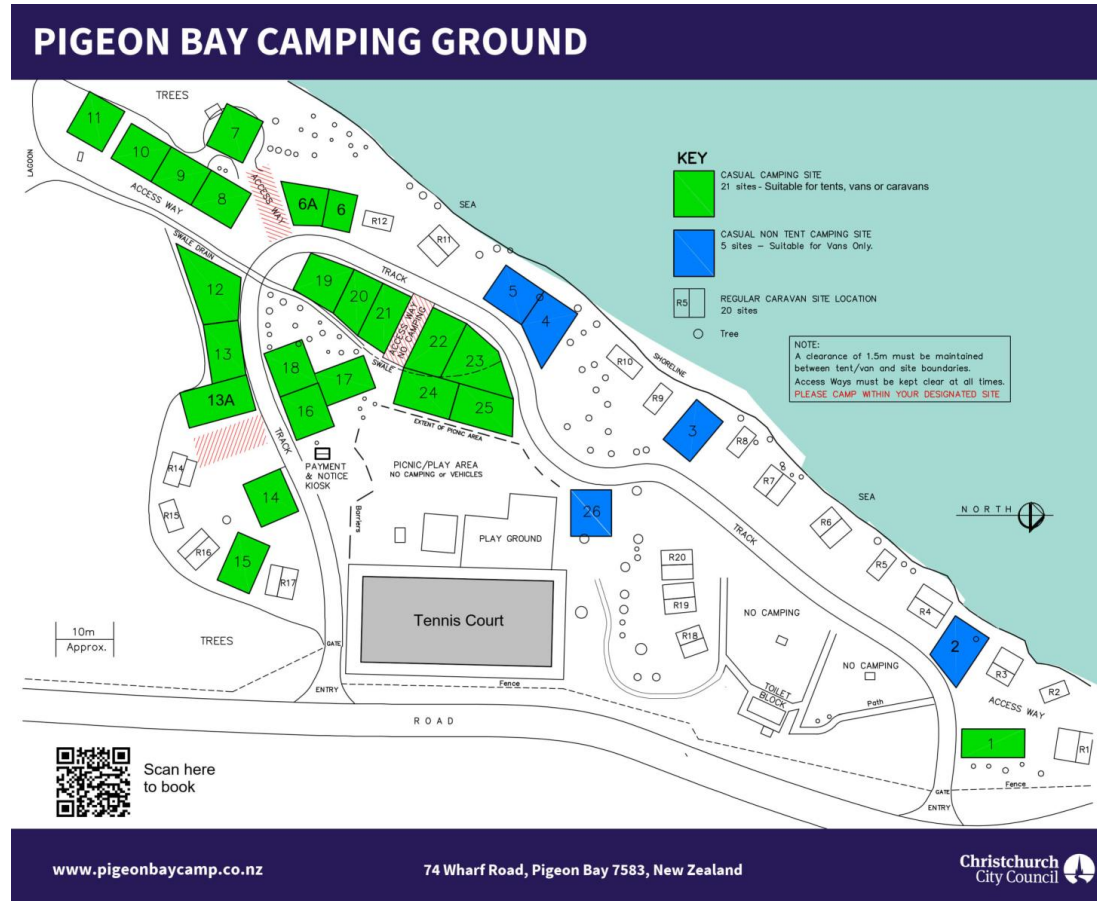
Pigeon Bay Reserve

From the CCC Pigeon Bay website.

Campground map.

Annual site holders along the coastline and close to the toilet block, only water tap and sink.

Green sites around the estuary area southern end of the camp.



## Other considerations for the Community Board

- Does the camping ground meet sanitary requirements - one water tap , from a restricted community water supply.
  - Toilet block sanitizer only for handwashing .
  - Grey water , a small soak pit , and septic waste holding tanks with regular emptying during the peak season.
- Ecologically significant site - few mudflat areas on Banks Peninsula. A known site, for nesting oyster catchers, and other shore birds.
- Ongoing viability of the site - a fragile site the result of a landslide and infill, impacts of high tides, strong winds and sea inundation, erosion and tsunami.

## Going forward

The Pigeon Bay Reserve is a public reserve under the Reserve Act our Pigeon Bay community recreation reserve and includes our local playground.

- The reserve needs to meet the requirements of the Reserve Act.
- Ensure the campground meets the Camping Ground Regulations 1985 and Health regulations .
- Further reduce, the number of Annual Camp Sites to 10 over 3 years.
- All caravans registered and warranted so that they can be moved offsite.
- Fairness for all, transparency in the allocation of sites.
- Reduce committee size to ensure half local Pigeon Bay residents.
- No leasing of the camping ground.

Additional material - Pam Richardson

20th April 2026

Version  
as at 15 November 2021



## Camping-Grounds Regulations 1985 (SR 1985/261)

David Beattie, Governor-General

### Order in Council

At the Government House at Wellington this 7th day of October 1985

Present:

His Excellency the Governor-General in Council

Pursuant to section 120B of the Health Act 1956, His Excellency the Governor-General, acting by and with the advice and consent of the Executive Council, hereby makes the following regulations.

#### Contents

		Page
1	Title and commencement	2
2	Interpretation	2
3	Registration	3
	<i>General requirements</i>	
4	Camp plan	4
5	Marking of sites	4
6	Camp sites	4
7	Cabins	5

#### Note

The Parliamentary Counsel Office has made editorial and format changes to this version using the powers under subpart 2 of Part 3 of the Legislation Act 2019.

Note 4 at the end of this version provides a list of the amendments included in it.

**These regulations are administered by the Ministry of Health.**

- 1

r 1	<b>Camping-Grounds Regulations 1985</b>	Version as at 15 November 2021
8	Lighting	5
9	General standards	5
10	Records	5
	<i>Relocatable homes</i>	
11	Site requirements of relocatable home park	6
12	Access	6
13	Standard of compliance	6
	<i>Miscellaneous provisions</i>	
14	Certificates of exemption	6
15	Duty of local authorities	7
16	Appeals to medical officer of health	7
17	Appeals to District Court	7
18	Offences	8
19	Transitional provision	8
20	Revocations	8
	<b>Schedule</b>	<b>9</b>
	<b>Standards for camping grounds</b>	

## Regulations

### 1 Title and commencement

- (1) These regulations may be cited as the Camping-Grounds Regulations 1985.
- (2) Except as provided in regulation 19, these regulations shall come into force on 1 January 1986.

### 2 Interpretation

In these regulations, unless the context otherwise requires,—

**Act** means the Health Act 1956

**camp plan**, in relation to any camping ground, means the plan required to be provided and kept under regulation 4

**camp site** means any area within a camping ground set apart or available or used for the erection or placing thereon of a temporary living place

**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

Version as at  
15 November 2021

Camping-Grounds Regulations 1985

r 3

**drinking water standards** means the standards made under section 47 of the Water Services Act 2021

**operator**, in relation to any camping ground, means the person to whom a certificate of registration has been granted under regulation 3 in respect of the camping ground, or who is responsible for the daily management of the camping ground

**potable water** means water that—

- (a) is safe to drink; and
- (b) complies with the drinking water standards

**relocatable home** means a structure comprising a group of rooms occupied or intended to be occupied either permanently or temporarily as the living quarters of a single housekeeping unit (whether consisting of 1 or more persons), which is completely self-contained in respect of domestic equipment and facilities and which is designed to be relocatable and is located in a camping ground; but does not include a tent

**relocatable home park** means a camping ground used or intended to be used for relocatable homes, or an area of land within a camping ground used or intended to be used for relocatable homes

**remote camp site** means a camping ground in a national park, State forest, State forest park, or public reserve, or on Crown land

**temporary living place** means a cabin, caravan, vehicle, tent, or other building or structure intended for human habitation for periods not exceeding 50 days in any continuous term of occupancy.

Regulation 2 **drinking water standards**: inserted, on 15 November 2021, by section 206(2) of the Water Services Act 2021 (2021 No 36).

Regulation 2 **potable water**: inserted, on 15 November 2021, by section 206(2) of the Water Services Act 2021 (2021 No 36).

### 3 Registration

- (1) Subject to regulation 14(1), no person shall use or permit to be used any land as a camping ground unless that person is the holder of a current certificate of registration in respect of that land issued by the local authority in accordance with the Health (Registration of Premises) Regulations 1966 (SR 1966/73).
- (2) No local authority shall register or renew the registration of any premises as a camping ground that do not comply with the requirements of these regulations.
- (3) Notwithstanding the provisions of the Health (Registration of Premises) Regulations 1966, the local authority may refuse to—
  - (a) grant a certificate of registration in respect of any land; or
  - (b) permit the use of an existing camping ground for a relocatable home park,—

3

r 4

Camping-Grounds Regulations 1985

Version as at  
15 November 2021

if it is of the opinion that the locality, position, or condition of the land makes it unsuitable for the purpose of a camping ground or a relocatable home park.

*General requirements*

**4 Camp plan**

- (1) For every camping ground there shall be prepared and maintained a camp plan showing the following matters:
  - (a) the position and boundaries of the camping ground:
  - (b) the position and boundaries of every camp site:
  - (c) the number of each camp site:
  - (d) the position of every building, access road, path, cookhouse, caravan drainage point, ablution place, toilet, sewage tank, and disposal system within the camping ground:
  - (e) the position and boundary of any relocatable home park:
  - (f) the position and boundaries of every relocatable home site.
- (2) Two copies of the camp plan shall, if required, be lodged with the local authority on the first application for a certificate of registration, and on any subsequent alteration of the plan.
- (3) The camp plan shall be made available on request at all reasonable times for examination by an inspector.

**5 Marking of sites**

The boundaries of every camp site and every relocatable home site shown on the camp plan shall be kept plainly marked to the satisfaction of an inspector, and the number of every camp site shall be permanently displayed on, at, or near, the boundary of each camp site.

**6 Camp sites**

- (1) No area shall be used as a camp site unless it—
  - (a) is shown on the camp plan; and
  - (b) is not less than 53 square metres in area; and
  - (c) is not less than 8 metres wide; and
  - (d) is accessible by an all-weather footpath, road, or other access way.
- (2) No temporary living place shall be erected or placed on any camp site within 3 metres of any other temporary living place, or within 1.5 metres of any camp site boundary, as the case may be.
- (3) No building or structure shall be placed on the camp site unless permitted in writing by the local authority.

4

Version as at  
15 November 2021

Camping-Grounds Regulations 1985

r 10

- (4) Nothing in subclause (2) shall apply to separate temporary living places within a building containing 2 or more such places.

**7 Cabins**

The floor area of a cabin shall be not less than 7.5 square metres, plus an additional 3.5 square metres for each additional person in excess of 2 that the cabin is designed to accommodate.

**8 Lighting**

- (1) Lighting shall be provided, to the satisfaction of the local authority, in buildings, at entrances to, and footpaths, roads, and other access ways within, the camping ground.
- (2) The lighting required under subclause (1) shall be kept on during the hours of darkness in the occupied areas of the camp.

**9 General standards**

- (1) The following requirements shall be complied with:
- (a) the requirements specified in the Schedule:
  - (b) *[Revoked]*
  - (c) the camping ground shall be maintained, at all times, in a clean and sanitary condition to the satisfaction of the local authority:
  - (d) all rubbish receptacles shall be emptied at least once in every 24 hours when the camping ground is occupied, and all refuse shall be disposed of in a sanitary manner:
  - (e) ablution, kitchen, laundry, and toilet facilities shall at all times be kept clean and in good repair:
  - (f) the camping ground shall be provided with safeguards against fire, and means of escape in case of fire, to the satisfaction of the local authority.
- (2) Notwithstanding anything in subclause (1)(c), in the event of a conflict between any of the provisions of these regulations and any of the provisions of the bylaws of the local authority, the provisions of these regulations shall prevail.

Regulation 9(1)(b): revoked, on 19 January 1994, by regulation 2 of the Camping-Grounds Regulations 1985, Amendment No 1 (SR 1993/403).

**10 Records**

- (1) There shall be provided and maintained records showing the following:
- (a) the name and address of the person occupying any camp site, or the person responsible for the group where there is more than 1 person:
  - (b) the number of the camp site occupied by that person:
  - (c) the date upon which occupation commenced:

5

r 11

Camping-Grounds Regulations 1985

Version as at  
15 November 2021

- (d) the number of persons occupying each camp site:
  - (e) the date upon which occupation terminated.
- (2) All records kept under this regulation shall be made available on request at all reasonable times for examination by an inspector.

*Relocatable homes*

**11 Site requirements of relocatable home park**

- (1) No relocatable home shall be erected or placed on a relocatable home park site without the written consent of the local authority.
- (2) No relocatable home shall be erected or placed on any site within a camping ground other than on a site that is part of the land set aside as a relocatable home park.
- (3) The relocatable home park shall be separate from that part of the camping ground used for camp sites unless otherwise permitted by the local authority.
- (4) The relocatable home park shall be serviced with reticulated sewerage, storm water drainage, and a reticulated water supply, to the satisfaction of the local authority.

**12 Access**

All-weather access from the entrance to the camping ground to the site of every relocatable home shall be provided and maintained to the satisfaction of the local authority.

**13 Standard of compliance**

Subject to regulation 14(2), the owner of a relocatable home situated in a relocatable home park shall ensure that it complies with the requirements of the Building Regulations 1992.

Regulation 13: amended, on 19 January 1994, by regulation 3 of the Camping-Grounds Regulations 1985, Amendment No 1 (SR 1993/403).

*Miscellaneous provisions*

**14 Certificates of exemption**

- (1) Where a local authority is satisfied that undue hardship would be caused by the application of regulation 3 to any camping ground, it may grant the operator a certificate of exemption from such requirements of that regulation as it specifies in that certificate.
- (2) Where a local authority is satisfied that undue hardship would be caused by the application of regulation 13 to any relocatable home, it may grant the owner a certificate of exemption from such requirements of that regulation as it specifies in that certificate.

6

Version as at  
15 November 2021

Camping-Grounds Regulations 1985

r 17

- (3) A local authority may grant the operator of a remote camp site a certificate of exemption from such requirements of these regulations as it specifies in that certificate.
- (4) A certificate of exemption granted under subclause (1) or subclause (2) or subclause (3) shall have effect for such period as the local authority specifies in that certificate, and may be renewed from time to time, but may not be transferred from the operator, or owner or occupier of a relocatable home, to the succeeding operator, or owner or occupier.

#### **15 Duty of local authorities**

- (1) Every local authority shall—
  - (a) enforce the provisions of these regulations within its own district; and
  - (b) cause a regular inspection to be made of all camping grounds.
- (2) Any local authority may cause a regular inspection to be made of all relocatable homes.
- (3) Nothing in subclause (1) shall derogate from any function, power, or duty conferred or imposed on a local authority by any other enactment, or conferred or imposed on any person in the service of the Crown.

#### **16 Appeals to medical officer of health**

- (1) An operator who is aggrieved by any decision of the inspector of the local authority under these regulations may appeal in writing to the medical officer of health within 14 days after being notified in writing of the decision of the inspector.
- (2) On hearing the appeal, the medical officer of health may confirm, reverse, or modify the decision of the inspector.
- (3) Every decision of the medical officer of health under this regulation shall be in writing, stating the reasons for that decision, and copies of the decision shall be supplied to the appellant, and to the inspector of the local authority whose decision was the subject of the appeal.

#### **17 Appeals to District Court**

- (1) An operator who has had an appeal decided under regulation 16 by a medical officer of health may appeal against that decision to a District Court within 14 days after being notified in writing of that decision.
- (2) No appeal shall lie under subclause (1) against a refusal to register any camping ground or to renew or revoke the registration of any premises, in accordance with the Health (Registration of Premises) Regulations 1966.
- (3) An operator who is aggrieved by a decision of the local authority pursuant to regulation 14(3) may appeal against that decision to a District Court within 14 days after being notified in writing of that decision.

7

r 18

Camping-Grounds Regulations 1985

Version as at  
15 November 2021

- (4) An appeal under this regulation shall be made by way of an originating application in accordance with the District Courts Rules 2009 (SR 2009/257), and shall be filed in the office of the court nearest to the place of business in respect of which the decision appealed against was made.
- (5) On hearing an appeal brought under this regulation, the court may confirm, reverse, or modify the decision made by the medical officer of health or local authority, and the decision of the court on the appeal shall be final.  
Regulation 17(4): amended, on 1 November 2009, pursuant to rule 17.1 of the District Courts Rules 2009 (SR 2009/257).

#### 18 Offences

- (1) Every operator of a camping ground commits an offence against these regulations who—
  - (a) contravenes regulation 3; or
  - (b) fails without reasonable excuse to ensure that the camping ground complies at all times with the requirements of regulations 4(1), 5 to 9, 10(1), and 11 to 13; or
  - (c) fails without reasonable excuse to comply with subclause (2) or subclause (3) of regulation 4 or with regulation 10(2).
- (2) Every owner of a relocatable home commits an offence who contravenes or fails to comply with any of the provisions of subclauses (1) and (2) of regulation 11, and regulation 13.

#### 19 Transitional provision

In respect of any land that was being used lawfully immediately before 1 January 1986 as a camping ground, it shall, until 1 September 1986, be sufficient for the purposes of regulation 3(2) if the camping ground complies with all the requirements of the Camping Ground Regulations 1936, so far as they applied to that camping ground immediately before that date.

#### 20 Revocations

The following regulations and notice are hereby revoked:

- Camping Ground Regulations 1936 (SR 1936/89):
- Camping Ground Regulations Extension Notice (No 2) 1949 (SR 1949/124):
- Camping Ground Regulations 1936, Amendment No 1 (SR 1975/64).

Version as at  
15 November 2021

Camping-Grounds Regulations 1985

Schedule

**Schedule**  
**Standards for camping grounds**

r 9(1)(a)

**Part 1**  
**Buildings**

The buildings shall be maintained in good repair.

Schedule Part 1: amended, on 19 January 1994, by regulation 4(1) of the Camping-Grounds Regulations 1985, Amendment No 1 (SR 1993/403).

**Part 2**  
**Water supply**

- 1 There shall be an adequate supply of potable water provided to the satisfaction of the local authority.
- 2 There shall be an adequate supply of hot water, provided to the satisfaction of the local authority, to ablution, kitchen, and laundry facilities.
- 3 Water shall be reticulated throughout the camping ground to taps, which shall be located not more than 25 metres from any camp site.
- 4 Water shall be reticulated to every relocatable home site.

Schedule Part 2 clause 1: amended, on 15 November 2021, by section 206(2) of the Water Services Act 2021 (2021 No 36).

**Part 3**  
**Ablution and sanitary fixtures**

- 1 Ablution and sanitary fixtures shall be provided in accordance with the following table:

Table  
Numbers of sanitary fixtures

Nature of fixture	Number of fixtures	Maximum number of persons to be served	
		Male	Female
Water closet pans	1	25	12
	2	50	25
	3	100	50
	4		75

9

Schedule **Camping-Grounds Regulations 1985** Version as at  
15 November 2021

Nature of fixture	Number of fixtures	Maximum number of persons to be served	
		Male	Female
	5		100

An additional fixture shall be provided for each 40 persons of either sex, or part thereof.

Urinals	1	For each 50 males or part thereof	
<b>Note:</b> Every 600 mm length of continuous wall urinal shall be the equivalent of 1 urinal stall.			

Wash-hand basins	Number of fixtures	Maximum number of persons to be served	
		Male	Female
	1	25	25
	2	50	50
	3	100	100
	4	150	150
	5	200	200
	6	250	250

An additional wash-hand basin shall be provided for each additional 50 persons of either sex, or part thereof.

Showers	Number of fixtures	Maximum number of persons to be served	
		Male	Female
	1	25	25
	2	60	60
	3	100	100
	4	140	140
	5	180	180
	6	220	220

An additional shower shall be provided for each additional 50 persons of either sex, or part thereof.

- 2 It shall be assumed that the persons to be served by the sanitary fixtures consist of equal numbers of either sex, unless the purposes for which the premises are generally used or other special circumstances otherwise require.
- 3 In calculating the occupancy of a camping ground or relocatable home park, no site shall be deemed to accommodate less than 3.5 people.
- 4 Ablution and sanitary fixtures shall be readily accessible, and shall be located not more than 75 metres from any camp site or relocatable home site that they are required to serve.
- 5 Surfaces of internal walls of buildings containing sanitary fixtures shall be constructed of materials that are durable and capable of being readily cleaned.
- 6 Sanitary fixtures, in temporary living places or relocatable homes, for the exclusive use of occupants shall not be counted for the purpose of this schedule.
- 7 Every room or compartment containing a bath, shower, urinal, or water-closet pan shall be so constructed and situated as to ensure the privacy of the user.

Version as at  
15 November 2021

Camping-Grounds Regulations 1985

Schedule

#### **Part 4 Refuse disposal**

- 1 Refuse containers shall be provided not more than 50 metres from every camp site.
- 2 Refuse containers shall be of either a single-use disposable type, or constructed of metal or other materials that are durable and capable of being readily cleaned, and shall have close-fitting lids.

#### **Part 5 Cooking places**

- 1 Cooking places of a type, number, and location shall be provided to the satisfaction of the local authority.
- 2 Each cooking place shall be provided with adequate hot water, sinks, benches, and cooking facilities.
- 3 Surfaces of internal walls of kitchens shall be constructed of materials that are durable and capable of being readily cleaned.

#### **Part 6 Laundry facilities**

Clothes washing and drying facilities for the use of campers shall be provided so that the number of fittings is not less than 2 laundry tubs and 1 washing machine for every 200 persons, or part thereof.

#### **Part 7 Drainage**

A drainage system for the removal and disposal of foul water, waste water, and storm water shall be provided in accordance with the building code set out in Schedule 1 of the Building Regulations 1992, or to the satisfaction of the local authority, as may be required.

Schedule Part 7: amended, on 19 January 1985, by regulation 4(2) of the Camping-Grounds Regulations 1985, Amendment No 1 (SR 1993/403).

11

Schedule

Camping-Grounds Regulations 1985

Version as at  
15 November 2021

P G Millen,  
Clerk of the Executive Council.

Issued under the authority of the Legislation Act 2019.  
Date of notification in *Gazette*: 10 October 1985.

Version as at  
15 November 2021

Camping-Grounds Regulations 1985

Notes

## Notes

### **1 General**

This is a consolidation of the Camping-Grounds Regulations 1985 that incorporates the amendments made to the legislation so that it shows the law as at its stated date.

### **2 Legal status**

A consolidation is taken to correctly state, as at its stated date, the law enacted or made by the legislation consolidated and by the amendments. This presumption applies unless the contrary is shown.

Section 78 of the Legislation Act 2019 provides that this consolidation, published as an electronic version, is an official version. A printed version of legislation that is produced directly from this official electronic version is also an official version.

### **3 Editorial and format changes**

The Parliamentary Counsel Office makes editorial and format changes to consolidations using the powers under subpart 2 of Part 3 of the Legislation Act 2019. See also PCO editorial conventions for consolidations.

### **4 Amendments incorporated in this consolidation**

Water Services Act 2021 (2021 No 36): section 206(2)

District Courts Rules 2009 (SR 2009/257): rule 17.1

Camping-Grounds Regulations 1985, Amendment No 1 (SR 1993/403)

Wellington, New Zealand:

Published under the authority of the New Zealand Government—2021

13

Additional material - Pam Richardson 20th April 2026



## Application for exemption from requirements in the Camping-Grounds Regulations 1985

Made under regulation 14(1) of the Camping-Grounds Regulations 1985

A136201

<b>1. Type of application</b>	
Tick the box to indicate which type of application you are making.	
<input type="checkbox"/>	New exemption. You must answer all questions in full and complete the declaration.
<input type="checkbox"/>	Renewal of existing exemption. You must answer questions 1 to 3 in full and complete the declaration. In answering any of the other questions, you can state "no change" where information remains the same as for your existing exemption, or answer the question more fully.
<b>2. Applicant's name</b>	
State the full legal name of the applicant. If a certificate of registration has already been granted (or is being sought alongside this application), the applicant must be the same as the holder of the certificate of registration. If no certificate of registration has been granted, then the applicant must be the person who is responsible for the daily management of the camping ground. An applicant can be an individual or an entity such as a company.	
<b>3. Contact details</b>	
State the name and contact details for the individual who Ōpōtiki District Council can contact about this application. This can be the applicant, or some other person.	
Full name	
Postal address	
Phone	
Mobile	
Email	
<b>4. Name and location of camping ground</b>	
State the name of the camping ground and its location. Location can be described using a street address or by reference to computer freehold register (e.g. Lot 1 on DP 456789 described in CFR 123456). If the camping ground area is only part of a larger property, tick the box below and attach a map of the area that shows which part of the property is to be used as a camping ground.	
<input type="checkbox"/>	Map attached, showing area to be used as a camping ground
<b>5. Exemptions sought</b>	
All regulations and parts of the Schedule in the Camping-Grounds Regulations 1985 for which exemptions can potentially be sought, and a brief summary of the relevant requirements in those regulations and parts, are set out below. For each regulation and part, tick the box that applies to you. If you are seeking a partial exemption, state which requirement(s) in the regulation or part you are seeking an exemption from. You may wish to refer to the Regulations, which are available on <a href="http://www.legislation.govt.nz">www.legislation.govt.nz</a>	
<b>Regulation 3</b> Need to register a camping ground.	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:

<p><b>Regulation 4</b> Need to prepare and maintain a camp plan showing matters in regulation 4(1)(a) to (f), and to lodge two copies of the camp plan with the council.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 5</b> Need to mark camp sites and boundaries, and number camp sites.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 6</b> Need to ensure camp sites comply with size and location requirements in regulation 6(1) and (2), and obtain written permission from territorial authority before placing a building or structure of a camp site.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 7</b> Need to ensure any cabins comply with the size requirements in regulation 7.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 8</b> Need to provide lighting infrastructure as per regulation 8(1) and keep it on during the hours of darkness in the occupied areas of the camping ground.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 9(1)(c)</b> Need to maintain camping ground in a clean and sanitary condition.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 9(1)(d)</b> Need to empty rubbish receptacles and dispose of refuse in a sanitary manner.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 9(1)(e)</b> Need to keep ablution, kitchen, laundry, and toilet facilities clean and in good repair.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 9(1)(f)</b> Need to provide safeguards against fire and means of escape in case of fire.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 10</b> Need to create and maintain records addressing the matters in regulation 10(1)(a) to (e), and make them available to a territorial authority inspector.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:
<p><b>Regulation 11</b> Need to ensure any relocatable homes meet the site requirements set out in regulation 11.</p>	<input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:

<p><b>Regulation 12</b> Need to provide all-weather access from camping-ground entrance to any relocatable homes.</p>	<p><input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:</p>
<p><b>Part 1 of the Schedule</b> Need to maintain any buildings in the camping ground in good repair.</p>	<p><input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:</p>
<p><b>Part 2 of the Schedule</b> Need to supply water in accordance with part 2 of the Schedule.</p>	<p><input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:</p>
<p><b>Part 3 of the Schedule</b> Need to provide ablution and sanitary fixtures in accordance with part 3 of the Schedule.</p>	<p><input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:</p>
<p><b>Part 4 of the Schedule</b> Need to provide refuse containers in accordance with part 4 of the Schedule.</p>	<p><input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:</p>
<p><b>Part 5 of the Schedule</b> Need to provide cooking places in accordance with part 5 of the Schedule.</p>	<p><input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:</p>
<p><b>Part 6 of the Schedule</b> Need to provide laundry facilities in accordance with part 6 of the Schedule.</p>	<p><input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:</p>
<p><b>Part 7 of the Schedule</b> Need to provide a drainage system in accordance with part 7 of the Schedule.</p>	<p><input type="checkbox"/> No exemption <input type="checkbox"/> Full exemption <input type="checkbox"/> Partial exemption, being:</p>
<p><b>6. Undue hardship</b> <i>Opōtiki District Council can grant an exemption only if satisfied that compliance with the Camping-Grounds Regulations 1985 will cause "undue hardship" to the camping ground operator. Explain how compliance with specific Regulations from which exemption is sought will cause hardship in this case. Tick the box below if you are attaching additional pages and/or supporting evidence.</i></p>	
<p><input type="checkbox"/> Additional pages/supporting evidence attached.</p>	

<p><b>7. Public health considerations</b> Exemptions have the potential to compromise public health. State what measures (if any) you propose to take to help (e.g. if public health could be compromised by a full exemption from the need to provide sanitary and ablution facilities, indicate that you are willing to accept a condition on the exemption that the camping ground will accept only campers using fully self-contained vehicles). This is your opportunity to propose appropriate conditions on the exemption sought. Tick the box below if you are attaching additional pages.</p>	
<p><input type="checkbox"/> Additional pages attached.</p>	
<p><b>Applicant's declaration</b> This section is to be completed by the applicant. Read the statement below, then sign and state the date. If the applicant is an entity, ensure the person signing has authority to do so.</p>	
<p><input type="checkbox"/> I declare that the information provided in this form is accurate and complete and that I will advise Ōpōtiki District Council in the event I become aware of any further or new information that is material to this application.</p>	
<b>Signed</b>	
<b>Date</b>	
<b>Notes</b>	
<p><b>Application fee must be paid:</b> Ōpōtiki District Council will not start its assessment of an application until it has received payment of the fee in full. Refer to <a href="http://www.odc.govt.nz/feescharges">www.odc.govt.nz/feescharges</a> for the applicable fee.</p> <p><b>Timeframe for Ōpōtiki District Council's assessment:</b> Ōpōtiki District Council aims to assess each application for exemption within 20 working days of receiving the completed form and the application fee having been paid in full. The timeframe will be suspended if the council seeks further information from the applicant, while it waits on the applicant's response. If for any reason the council cannot meet the timeframe, it will inform the applicant.</p> <p><b>Personal information:</b> personal information provided in this form and during the course of assessing this application will be used by Ōpōtiki District Council for the purpose of assessing this application and carrying out the council's duties under the Camping-Grounds Regulations 1985 and may be shared with the council's contractors or agents for these purposes. If you do not provide the information requested, the council may refuse to grant the exemption sought. The council will keep a record of this application and its decision. If an exemption is granted, the council will also record relevant information in its register of camping grounds (held under regulation 8 of the Health (Registration of Premises) Regulation 1966), which can be inspected by any employee of the Director-General of Health, Medical Officer of Health, Health Protection Officer, or an officer who has functions under an enactment administered by the Ministry of Health. You have the right to access and seek correction of your personal information.</p>	

Zach Hitchcock

Hello members of the Banks Peninsula Community Board. My name is Zach Hitchcock, and I am the Commodore of the Pigeon Bay Boating Club. Thank you for the opportunity to speak to our submission regarding the future of the annual campsites at Pigeon Bay.

We are here today to advocate for **Option Two**: allowing annual sites to remain as they are, with the necessary consent from the Minister.

The Pigeon Bay Boating Club is not just a sports organization; it is a community institution woven into the fabric of the bay since 1962. The club's founders include descendants of the early settler families of Pigeon Bay. Our history is one of hands-on stewardship. We are a club built by the community, for the community. The club not only offers the opportunity for organised sailing in Pigeon Bay, but also supports or hosts community events, including weddings, Anzac Day services, beach clean-ups, planting initiatives, Easter celebrations, and maintaining the public boat ramp and jetty. The club serves as a vital social hub for locals and visitors alike.

The Pigeon Bay Boating Club and the Pigeon Bay Campground has a unique co-dependent relationship forged over many years.

Our members who are annual site holders have been proactive with their support in the operation of the campground. This includes holding positions on the reserve committee, stepping in to run the camp on several occasions when the council was unable to find a caretaker, maintaining the reserve, and providing security and oversight of the campground.

The club's regattas including South Island and National Championships—bring significant revenue to the campground, as visiting sailors often stay at the campground. These regattas are typically held outside of public holiday weekends, when the campground is often nearly empty. In addition, the regattas generate revenue for local businesses in Duvauchelle and Akaroa.

The most critical point I wish to convey today is that: **the Pigeon Bay Boating Club will likely cease to exist if ~~these annual sites are removed~~ or the conditions for use prevent our members from running the club.** *the reserves act is enforced*

Most of our members live in Christchurch or other parts of Canterbury. Because of Pigeon Bay's remote location, towing boats and caravans back and forth every weekend is physically and financially unsustainable. It's difficult to tow a caravan and a boat at the same time.

The club volunteers who hold the annual sites are the engine room of our club. Our sailing program alone requires the full 28-day limit permitted by the Reserves Act. If our key members are restricted to only four weeks per season, they will have no time left for all the tasks that are required to run the club including:

- Essential club and rescue boat maintenance.

- Providing sailors, race officials, and crewing rescue boats to meet the requirements of Yachting New Zealand
- Preparation for major regattas
- Attendance at club meetings including the Annual General Meeting

The net effect of enforcing full compliance with the reserves act would be to dismantle a 64 year-old institution and reduce the opportunity for people to enjoy the sport of sailing, rather than promote recreational activity. It will have a significant negative impact on the total occupancy and revenue of the campground, rather than increase it.

We ask the Board to recognize this historical and operational necessity and support Option Two to ensure the Pigeon Bay Boating Club remains a vibrant part of our community for the next 64 years and beyond.

Thank you.

# Liz Carter

## Resident of Duvauchelle

### Support for Option 3

# EVERYONE

needs to remember that the Duvauchelle  
camping area is on the local community  
reserve and should be able to be enjoyed by all.









## Conditions:

- No caravans in the immediate vicinity of the playground & tennis courts
- No caravans on the playing area of the field (around edges ok)
- Caravans need to be up to a certain standard – not rust buckets
- Name needs to reflect that it is a community reserve and camping ground

8 active members

27 + 12 = 39 sailing days  
+ working bee!

Maree  
Andrews

Thank you for allowing me to present.

My name is Maree Andrews I support option 3

I have been a PBBC member for around 38 years and believe the survival of the PBBC is directly related to active club members occupying annual campsites.

This is needed to accommodate active members to successfully run and maintain the club.

- Active member means – current active sailors, support people required to run races, maintain safety requirements, the club house, rescue boats, tractor, container etc.

The need for caravans for this use was recognized in the 1970's by Ray Short an active PBBC member (with a house in the bay) as the only way to make PBBC viable. At the time Ray Short owned Caravan Court and relocated a number of caravans to the Toilet block area of the reserve for caravans to be used by sailors. This allowed them to sail 2 regular club sailing Saturday & Sunday, run regattas, social events, maintain and upgrade the club house etc.

In the 1970/80's the PBBC built the public ramp and the council toilet block in the boat park.

Around the time when Ray set up the caravans, they also managed the reserve for the council for a couple of years until a reserve board was established.

I recognize that PB is a beautiful place to be and should be available to all people. I have been made aware that there are as few as 5 nights in 365 nights that the camp ground is full. When this has been the case the camp manager has contacted annual site holders and asked if their site could be used. I know the answer has been yes.

PBBC hosts Canterbury, South Island, Class and National regattas. Attracting the sailors, their support people, family and friends to stay in the camp ground, in the wider peninsula area and at accommodation in the bay. They shop, eat at cafes and restaurants in Akaroa and Duvauchelle.

A class event recently run by the club bought 13+ extra people into the camp ground and a national event can have up to 30 boats. Many sailors and support stay in the campground and the wider peninsula area.

The club hosts an average of 3 to 4 large events over a September to April season with regular club sailing Saturday and Sunday every 2<sup>nd</sup> weekend. Regular sailing can bring other family to visit often booking extra sites.

Club members partake in Community events, Anzac services, Easter Church & events, planting, beach clean ups, the PB Hall anniversary celebration, they attended High Teas when they were available. The club has run dances in the hall, we held our 50<sup>th</sup> celebration in the hall. When sail GP was held at Lyttleton the GP organization encouraged clubs to partake in wider peninsula events like clearing the track at Cass Bay. PBBC attended in force.

I strongly believe that if active PBBC members are not allocated at least 10 annual camp sites it will be the demise of the PBBC, as most of the active members do not live or have baches in the bay. Without the sites it would mean 2 trips to come and go each weekend. ie a boat then caravan.

It is a very symbiotic and unique relationship the PBBC holds with PB camp ground and Reserve Board. They are co-dependent, the Camp Ground for annual site holders on going regular yearly fees and to the PBBC by having the opportunity to have a place to stay for fortnightly sailing, maintenance, running regattas, partaking in community events.

Thank you.

The permanent caravan sites in the Pigeon Bay Reserve should be maintained solely for the use of “Active” Pigeon Bay Boating Club members in recognition of:

- the sporting asset they provide and maintain,
- their support of the local community and businesses, and
- their attracting visitors into the Banks Peninsula area.

These members volunteer their time and skills to provide a well-managed sporting and community asset to the benefit of Banks Peninsula and Christchurch.

The ability to have “Active” members accommodated in a permanent caravan site is a critical factor in the ability to provide these services giving ease and surety of accommodation. The loss of these sites would lead to the closure of the Pigeon Bay Boating Club.

#### **Sporting asset**

- The Pigeon Bay Boating club provides a sporting facility available for the local community and the people of Canterbury.
- The club is only one of three yacht clubs in the Christchurch area where you have sailable water 24/7 (the other 2 being Akaroa and Naval Point). All the rest have limitations due to tidal influence. Pigeon Bay is the only one of these three clubs that is free of a working port making it a quality sailing venue.
- The club is unique in that it provides a weekend away to sail, socialise and relax approximately every second weekend,
- The club hosts events with other yacht clubs and classes, and acts as a sailing race destination. (e.g. Lyttelton to Pigeon Bay race)
- The club is affiliated to yachting NZ and promotes the sport of yachting to a required standard, providing Race Officers, safety craft and risk management systems
- Due to this affiliation the club can hold provincial, South Island and National regattas.

#### **Supporting the local community and businesses**

- The Club has a historical symbiotic relationship with the Pigeon Bay Reserve Camp. (e.g. the club managing the camp for a period.)
- Club members support the Reserve by booking permanent and temporary sites and encouraging sailors, their families and friends to come and make a “weekend of it” increasing patronage
- The club members work with the camp manager and Reserve Board. (e.g. the Club has recently ceased holding what was a traditional Christmas Regatta to help reduce demand over this period).
- Club members are active with the local community through participation in social events and community activities (e.g. Anzac Day, beach clean-ups, planting)
- The club supports local businesses (e.g. organised club meals at local restaurants)

#### **Attracting visitors**

- The Club holds provincial, South Island and National regattas (e.g. South Island Zephyr). These regattas attract visitors from Tasman, Marlborough, West Coast, Canterbury, South Canterbury and Otago.
- Many attendees, especially those that have travelled with partners, families and friends, prefer to avail themselves of accommodation with a bit more luxury in the environs of Akaroa, also frequenting local restaurants, bars, businesses and tourist attractions.

The close associations between the Camp Manager, the Pigeon Bay Boating Club and the Pigeon Bay Reserve Board would enable confirmation of an “Active” Pigeon Bay Boating Club member.

There is opportunity to recognise Pigeon Bay Boating Club contributions by providing “Active” members access to a permanent caravan site.

Without this ability it will be a challenge for members to maintain the current services provided. Fortnightly towing of caravans is not sustainable. The complete loss of access would be a severe blow to the club and cause its demise, potentially by year end.

**There is no doubt that to have a permanent caravan site in the Pigeon Bay Reserve is a privilege.**

**“Active” members of the Pigeon Bay Boating Club earn this privilege through:**

- **providing and maintaining the club,**
- **supporting the reserve and the community,**
- **utilizing local businesses and**
- **attracting visitors.**

Andrew Tabb

Site 25 Permanent 40 years

Duvauchelle Feedback

- Submitter's 87% status quo, Committee, permanent, community, batch ownership etc, so why change what's not broken be different if we were looking at a much lower % but it's overwhelming in favour of Status quo, isn't this showing the old rules need to change.
  - Council strategic priorities = People at the centre prioritising wellbeing accessibility connections
  - Trust=working with communities & people
  - Balance the needs of today's people & future generations, we are that & bring this
  - 2004-2006 draft plans all this was talked about & allowing it to continue to support the monetary viability -There's approx. 60 Permanents each contributing to an Annual site fee \$650 plus 26 nights at \$40.00 = \$1,690, total all permanents \$101,400 where has the \$51,741 been calculated from
  - Cabins (4 new) are a removable structure, why were these given consent when council new these changes few coming up for review, if we go the cabins go
  - How why was consent given to a new House to be built a few years ago (Caretaker accommodation) on reserve land this will not be needed going forward if option 1 & 3 goes ahead in future
  - We support community business shops hospitality, fuel, ramp fees.
- Business will close, camp will become an empty space -revenue lost for the community \$\$ -Peak times camp is seldom full, may show on the Booking Website
- Item 4 - 8.3 regarding Option 2 Fully Consented with no operational change, Council states this would become a higher risk if enforcement was introduced at a later date? Why As it's been fully consented under new regulations.

Thanks for your time Regards Andrew Tabb

Friday 23

We are living in a time of great upheaval. Through the predominance of digital devices we are losing connection to each other. What we have at Pigeon Bay is a microcosm of how the world works better.

By having permanent sites, continuity helps everyone.

Casual campers frequently underestimate the severity of the cold of late evening and early morning. Often, they have no means of a hot breakfast or just a hot cup of tea. I have happily offered, campers have very happily accepted.

Permanent site holders interact with casuals. We play cards. Share stories. Have wonderful serendipitous times.

Recently, there was Josh, from California. Just passing through at the end of his trip to New Zealand. He was a tree / forest man by profession.

His van was parked up between Julie, a casual, but regular Reserve user with her pop-top <sup>AND ME!</sup> Josh did not know about the Hay reserve with its tiny pocket of old growth trees. Julie and I took him there and he was enthralled. I told Josh about a fascinating book about fungal life, and how it affects trees. He went over to Akaroa and there, found for himself, a second-hand copy. The three of us played Rummy Cub into the late evening.

Next day, on his way out, we took him up to Montgomery Reserve to see the big Totara. He left, having seen things that he had no knowledge of, being wowed. Vowing to return to New Zealand and its amazing bush.

Three of us had our lives changed. Made richer.

Recently, there was a young Frenchman, by himself, and who just loved the feel

241-124 Week 35

Tuesday 29

of the place. He said there was nothing like it in France.

We permanent site people are ambassadors for our country. We give a place a face, and a perspective.

I am often asked if you can drink the tap water, or does it need to be boiled.

What the road is like up and over the saddle into Port Levy.

Sometimes people will arrive in the early evening, having just booked online.

They have no idea how to find their allocated space. They are very happy to find a friendly face onsite.

I used to teach tai chi and once took my class at the bay. I hired the hall and we had lunch after at my caravan.

I have spent time shoring up the bank with careful rock placement.

I've handed to Chris, our current

1989  
243-122 Week 35  
Thursday 31

caretaker, a smartphone I found in the  
grass near my caravan.  
I pick up rubbish left by others and take  
it home for disposal.  
We are Guardians of the reserve, and,  
I believe, worth our weight in gold.  
We hold society together right down at the  
grassroots.

Site holders spend many years on the  
waiting list for a site to become available  
to them.

For many years I brought my tent over to  
Pigeon Bay and got to know the different  
caretakers. We permanent site holders  
all have a close ~~to~~ association with  
the bay of long-standing.  
We are a benefit to society.  
We are the glue.  
We are a treasure.

Oral Submission regarding Duvauchelle Campsites

- I am speaking on behalf of 7 annual site holders at Duvauchelle Holiday Park.
- Sites have been held from 3 to 35 years by families, covering several generations, in my case 30 years. Many annual sites have also changed hands over those years.
- Many annual site holders use their caravans all year round. Were these sites to revert to casual sites, or allocated annual sites, it is highly unlikely these would be occupied outside of the traditional “camping season” of Labour or Show Weekend to Easter.
- Solid awnings were erected adhering to the rules, and with the permission of the administering body. Section 95 (6) of the RA. *Used caravans, bathrooms & kitchen*
- Annual site holders agree to comply with the Reserves Committee rules, which allow us to sell our caravans to remain on site, with the prior permission of the committee. This has been custom and practice for 40 years.
- It is already clear in the rules, and is current practice, that once an annual site is cleared it reverts to a casual site.
- 58 of the current 122 sites are annual: 48% of capacity. This fits with the Dept of Conservation preference for longer-term sites not exceeding half of the total capacity.
- From a financial point of view, there is significant advantage in retaining the status quo, i.e. Option 2. Annual site fees bring in approximately \$36,000, and as we are required to occupy the sites for 26 double (2 people) nights per year, that amounts to a guaranteed income in excess of \$100,000 per year, almost twice the figure stated in the Officer’s recommendation report.
- We note that over 85% overall of submissions support Option 2 which is surely compelling community feedback and a mandate for the Community Board and Council.
- The Reserves Act Section 59A (1) provides for the Minister to grant a concession, which would give compliance with Section 44 (2). It appears that this ability has been delegated to the CCC Chief Executive. Given that Option 2 has been custom and practice for over 40 years, and overwhelming community feedback supports Option 2, we believe that this should be the recommendation, otherwise the consultation has been a waste of time and money.

Re: Te Pātaka o Rākaihautū Banks Peninsula Community Board 20 April Board Meeting -  
Deputation & Additional Information

Brent Warren

Like other Duvauchelle site holders, I spent a lot of money on an onsite unit relying on the Council's documented actions over decades of accepting fees, issuing permits, and formalizing operating administration. It would be fair & reasonable for a normal person to assume the tenancy would be ongoing.

Under the Reserves Act the current status quo appears legal.

1. Section 10(4) of the Act states that any local authority purporting to act under a delegation is presumed to be acting within the terms of that delegation unless proven otherwise. Therefore, the law presumes the Councils and boards acted legally.
2. Under Section 10, the Minister delegated significant management powers to local authorities, in this case councils managing banks peninsular. Section 10(5) states: "Any such delegation may at any time be revoked by the Minister in whole or in any part, but that revocation shall not affect in any way anything done under the delegated authority." If the Minister changed their mind now, the Act explicitly protects things already done.
3. Previous Councils lawfully created the Long-term Occupation sites via their Reserve Management Plans, bylaws and bylaw reviews. When those Councils set Long-term fees, accepted payments, issued rules and permits, they were exercising their management powers under Section 40. These were not "informal arrangements"; they were formal legal administrative acts. Under the principle of functus officio, a decision-maker cannot simply re-decide or undo a completed legal act just because they have a different policy preference today.
4. Under the principle of Administrative Finality once an administrative body has made a decision that imposes an obligation, denies a right, or fixes a legal relationship, it is final and cannot be revisited. The Domain Board, Akaroa and Banks Peninsular Councils were the lawfully appointed administering bodies with delegated legal authority of the minister under the Reserves Act to manage the reserve. They granted the rights to Long Term Site Holders within their statutory authority. The CCC is the legal successor to its predecessors. The previous Council's decisions were not mistakes to be corrected, but lawful exercises of their statutory rights at the time. A change in current Council policy or personnel does not retroactively invalidate the lawful administrative acts of their predecessors. Legally, the Council cannot disown its own prior decisions. The Minister does not need to approve now, because the power was already in the Council's hands. The status quo is legally protected.

For decades, Council actions actively induced public investment in long term units. By accepting Annual Site Fees, managing waiting lists, setting rules, permitting site transfers and allowing sales to occur at market rates, the Council established a regulatory environment where market value was a legitimate expectation that this practice would continue. A sudden reversal that causes financial loss can be argued as "procedurally unfair.

The current proposal to prohibit on-selling is a retrospective destruction of private property value. There's about 30 units at say \$25k ea which is getting up to 3/4 million dollars people stand to lose. Because these units were permitted to remain stationary for decades, they are unlikely to be road-worthy and are essentially worthless today, plus expensive to remove. To take away the ability to sell in an open market now effectively destroys their value for the current generation of owners. If the Council moves to extinguish these long-standing rights, it must address the resulting loss of investment through fair compensation.

**Excluded from verbal presentation because of 5 minute time restriction**

*-For over 50 years with the Reserves Act in place, boards and councils have actively encouraged year round sites and profited from them. The lease like arrangement was formalized by the annual fee structure, issuing annual site holder agreements with occupancy rules which established contractual rights and obligations, managing the **waiting list that all public could get on** and overseeing the administration of the sites.*

*-As records show, the camp was and is heavily reliant on the stable income stream from long-term sites, which provided financial scale allowing infrastructure development like manager's residence and office, underground power connections, yearlong employment of camp staff, upgrade of kitchen and bathroom facilities, etc. The success of this strategy is evident today*

*-The Councils made clear and unambiguous representation to the public that the occupation was lawful and long-term and the public relied on this. Doctrines of Legitimate Expectation Substantive Protection and Administrative Estoppel would apply to protect the public.*

*-These sites should be classified as Existing Use Rights where a long-standing activity that was lawful when it started is allowed to continue even if new rules are introduced or old rules previously ignored are attempted to be applied.*

*-In respect of availability to the general public, realistically, the only time this is an issue is when the camp is full, typically a few days like Xmas & Easter. This should be compared both financially & public enjoyment to the year round ongoing utilization long term site holders, who are also the public, make of the camp. It's illogical to believe that the odd casual camper who wants to stay a couple of nights on the few times the*

*camp is full & can't, can outweigh the financial and public enjoyment benefit derived from the long term site holders who commit to 25+ nights per year.*

*- Weather plays a big factor, inclement & casuals disappear. Permanents have to do their stay nights*

*-Similarly the policy of loyal campers rebooking camp sites year to year, so called prevents others from using those sites.*

*-Financially, if the long term site were vacated they would generate a small fraction of the lost income from long termers & the council rate payers would bare the cost.*

*-In terms of equity, everyone had the opportunity to obtain a permanent site, by getting on the wait list & making the commitment to the camp & stay nights.*

Good afternoon,  
I'm Brenda Graham - annual site holder  
+ secretary of the Reserve Committee

I've had a site in the reserve since  
1988 when my late husband + I along  
with our 2 daughters come to the bay  
for the fishing

Originally we had a site up at Kūrypa  
Youth Hostel + when a waterfront site  
became available we moved on to it.  
- I've since moved back from the  
waterfront.

I said ~~at~~ at the time we would stay  
for 2 years - no longer as I wouldn't  
want to go to the same place year  
after year.

To my surprise I fell in love  
with the bay + here I am 38yrs on  
having spent many happy weekends  
+ holidays in the reserve. In this  
time I've only missed 4 Christmases

Although I couldn't live there I  
feel it's my home away from home  
+ enjoy being part of the community.

I hear a lot of comments that  
the caravans are all taking the best  
spots + although they have the best  
view they are also shady + subject  
to the good old Beastly Easterly  
- our prevailing chilly wind which  
often makes sitting outside unpleasant

Not everyone can afford or wants  
to buy a holiday home or land  
at the bay so the annual sites  
are the next best thing.

Therefore I ask that you  
recommend the Christchurch City  
Council grant the Pigeon Bay  
Reserve Committee ministerial  
consent to retain Annual  
sites within the Pigeon Bay  
Reserve. Please + thank you!

Nicola Luisetti

## Feedback on Annual Campground Sites

Supporting Retention of Annual Sites and Community Wellbeing

Thank you for the opportunity to address you today regarding the future of annual sites at the Pigeon Bay campground. My name is Nikki Luisetti and I am a member of the Pigeon Bay Boat Club and have a Bach in Pigeon Bay. I've read and considered all the submissions, and they have influenced my remarks today.

I wish to express my strong support for retaining the annual sites as they are. I urge the council to seek support from the Minister to allow this arrangement to continue, as it plays a vital role in the sustainability of both the Pigeon Bay Boat Club and the campground itself.

Let me highlight the importance of annual sites. They are crucial in not only ensuring the survival of the Boat Club but also providing a steady income for the campground. Outside the peak 10 days of summer, the campground is seldom fully occupied. Sailing events, which are held fortnightly in summer, have coincided with increased campground occupancy. If annual site holders were removed, we risk the closure of the Boat Club and correspondingly a drop in campground revenue.

It's important to note that the campground is rarely full, so the income generated by annual site holders necessary for its financial health. Also, annual site holders are more actively involved in the community; they contribute significantly to the management, care and safety of the campground and its users. Without them, this support will fade and these vital elements will be lost.

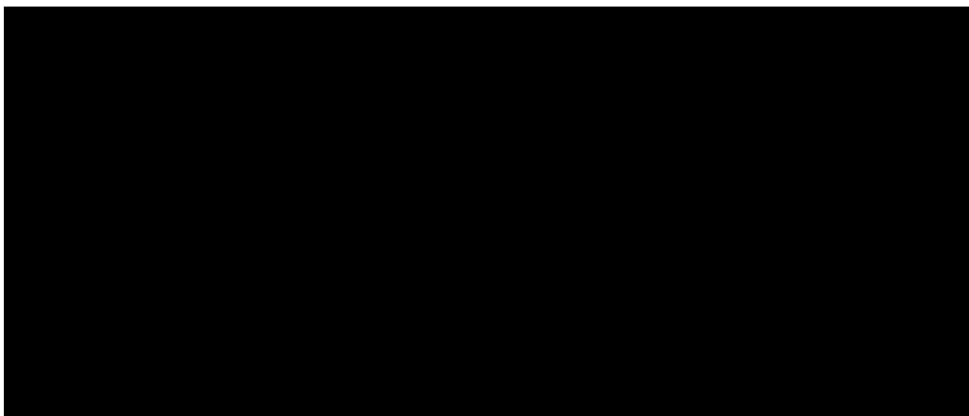
Having more campers during the busy summer holidays can put considerable strain on resources. By reserving some sites for annual users, the fluctuation in use helps spread this strain more evenly throughout the season. If the council feels that all sites should be available during peak times, a compromise could be reached by

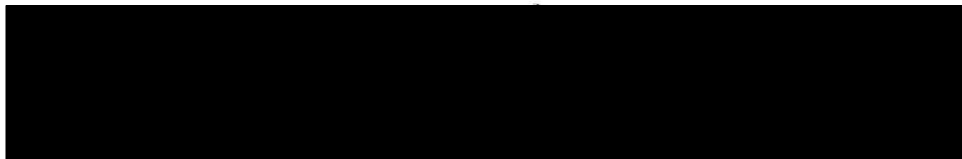
requesting annual site holders to vacate their caravans during identified periods. However, prior to this action being considered the question needs to be asked - can the campground support full occupancy? If not, then the current model preserves the facilities rather than overloads it.

Some submitters have noted that annual site holders occupy the best spots, limiting access for casual users. To improve fairness, vacant annual sites could be swapped with less desirable casual sites before offering the spot to someone on the waitlist.

I oppose phasing out annual sites in favour of casual ones. Our campground offers affordable accommodation for boat club members, and annual sites remove the logistical challenges of towing a boat and caravan for weekend trips. Preference on the waitlist for annual sites for our members or regular casual campground users would help us retain the sense of community while also supporting our boat club.

Several submitters believe that there should not be any annual sites rather that all sites should be available to all. While on the surface this sounds like an appealing argument, I don't think it stacks up: Clubs and accommodation providers often offer appealing choices to promote regular attendance and dedication among members. They do this to secure steady income and foster greater commitment and participation, beyond just fulfilling basic requirements. Casual users require more effort and input.





I respectfully request that the council explore all alternative options instead of recommending the natural attrition of annual sites. Possible solutions include temporary removal of caravans during the peak 10-day period, a more equitable distribution of annual sites to allow casual campers access to prime spots and introducing Warrant of Fitness requirements for caravans.

In conclusion, I urge you to consider these suggestions and prioritise the retention of annual sites, ensuring the continued success and vibrancy of our campground and boat club. Thank you for your attention.