

**BEFORE THE HEARINGS COMMITTEE APPOINTED BY
THE DUNEDIN CITY COUNCIL**

IN THE MATTER OF A resource consent application
LUC-2020-293 to operate a motor
caravan park at 20 Bay Road,
Warrington

BETWEEN **THE NEW ZEALAND MOTOR
CARAVAN ASSOCIATION INC.**

Applicant

**BRIEF OF EVIDENCE OF ALEXANDER JAMES IMLACH FOR
THE NEW ZEALAND MOTOR CARAVAN ASSOCIATION**

**GALLAWAY COOK ALLAN
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INTRODUCTION

Qualifications and Experience

1. My full name is Alexander James Imlach. I am known as James.
2. I am the National Manager – Property and Policy at the New Zealand Motor Caravan Association Incorporated (**NZMCA**).
3. I have been employed by the NZMCA for the past twelve years. Prior to my current role I held the positions of Resource Management Planner and Resource Management Coordinator at the NZMCA.
4. I hold a Bachelor of Science (Geography) from the University of Auckland and a Master's degree in Resource and Environmental Planning from Massey University.
5. Throughout my employment with the NZMCA, I have been involved in the design, development, and operation of several NZMCA Parks nationwide. I advise the Association on a range of planning and resource management issues, prepare resource consent applications, and attend hearings. I also advise the Association on various national, regional, and local body policy matters, including proposed plan changes, camping-related policies, and bylaws, and assisting with judicial review proceedings.

SCOPE OF EVIDENCE

6. My evidence will:
 - (a) provide an overview of the NZMCA, including the requirement for vehicles to be self-contained, the types of people using 20 Bay Road, Warrington (**site**) and a description of NZMCA Parks more generally;
 - (b) provide a detailed overview of the proposal, including the reasons for choosing the site, its typical daily use, and the potential benefits of the proposal; and
 - (c) outline how the site will be managed.

OVERVIEW OF THE NZMCA

7. The NZMCA was formed in 1956 by a small group of like-minded enthusiasts. Today, the NZMCA represents over 108,000 individual New Zealanders who enjoy exploring our country at leisure in their certified self-contained motorhomes and caravans. The NZMCA is widely regarded as the foremost authority on motor caravanning in New Zealand.
8. The NZMCA aims to provide safe and enjoyable motorhoming and caravanning opportunities for its financial members, along with the information and services they need to experience all our country has to offer with their friends and family, while respecting New Zealand's natural environment. Two of the NZMCA's four guiding principles are centred on fostering positive social interactions between members, and promoting environmental protection, enhancement, and awareness.
9. The relevant objects of the NZMCA, as recorded in its Constitution, are to:
 - (a) Promote road safety, safe driving and courteous behaviour by all members;
 - (b) Promote and foster good fellowship and enjoyment of Motor Caravan activities amongst all members;
 - (c) Promote the provision of safe overnight Motor Caravan parking facilities for Members throughout New Zealand; and
 - (d) Promote environmental sustainability and protection of the natural environment.
10. The NZMCA collaborates with stakeholders, including neighbours, residents, iwi, commercial operators, other not-for-profit organisations, community groups and government entities, on a wide range of issues.

11. Prior to applying for consent, the NZMCA held informal discussions with a representative for the Warrington community and met with Dunedin City Council officers in respect of potential planning issues and resource consent requirements. The NZMCA has also engaged with Aukaha and, through its consultant planner Kelly Bombay and local committee chairman, Ken Foote, met with mana whenua on site.
12. The NZMCA will maintain an open dialogue with mana whenua, neighbours, and the Council, to ensure the park operates in a safe and appropriate manner, should this application be granted.

Certified Self-Containment

13. The NZMCA supports the NZ Standard (**Standard**) for self-containment of motor caravans and caravans (NZS 5465:2001). All NZMCA Parks restrict access to members travelling in self-contained vehicles only.
14. The Association has promoted the concept of vehicle self-containment to its members since the early 1970s. In 1990 the NZMCA, in partnership with government agencies and tourism industry representatives, developed the first NZ Standard for recreational vehicle self-containment (NZS 5465:1990).
15. The primary objective of the Standard is to set out the basic requirements for the proper containment of wastewater and solid waste. The purpose of this is to provide a solution to the problems associated with the use of motor caravans and caravans in areas where there are no sewage disposal facilities. The Standard provides for the containment of solid waste, toilet waste and grey wastewater resulting from occupants' daily activities, and to supply their minimum freshwater needs, for a minimum three days.
16. The NZMCA has financially supported subsequent reviews and amendments to the Standard, the most recent being an amendment to the onboard toilet requirements in 2017, at a cost of \$50,000. The NZMCA is the largest issuing authority currently operating under the Standard, and ~~is~~

self-containment programme is supported by over 500 volunteer self-containment officers nationwide: members who are trained and qualified to certify motorhomes and caravans.

17. Certified self-contained vehicles must display a warrant on the front windscreen and keep a certificate inside the vehicle, to verify compliance with the Standard. Vehicles also display a voluntary blue sticker on the rear to help council enforcement officers quickly distinguish between a certified and non-certified self-contained vehicle. If necessary, vehicle certification can also be verified online at www.nzmca.org.nz.
18. The self-contained vehicles permitted on site are designed to avoid the discharge of black and grey wastewater to ground. The NZMCA has offered a condition of consent for the Warrington site restricting access to members travelling in certified self-contained vehicles only.
19. The Standard is highly regarded throughout New Zealand and is relied upon by the Department of Conservation and nearly all local authorities within their freedom camping policies and bylaws. The Dunedin City Council's Camping Control Bylaw 2015 only allows self-contained vehicles to freedom camping in most available areas throughout the district.

NZMCA Membership

20. NZMCA members are predominately in the retiree / baby-boomer demographic. Our research suggests members are generally hybrid campers, frequently alternating between freedom camping sites, commercial holiday parks, Department of Conservation campsites, private low-cost parking sites and NZMCA Parks.
21. According to registration data collected at other NZMCA Parks, members generally stay, on average, 1-3 nights per visit. The South Island, including Otago, is a popular destination for NZMCA members, which is why the Association has persevered and invested a lot of time and money into this proposal. In 2012, the Association purchased land on Woodhaugh Street in Dunedin from the Council to operate a consented motor caravan park.
22. The NZMCA's roots are throughout New Zealand, and its large network of volunteer members are the backbone of the club. Members play an integral role in the club's affairs, including the advancement of its purpose and

objectives. Board members, area committee members and park custodians volunteer their time for the betterment of the club. Members take great pride in improving and protecting the club's assets, in particular maintaining NZMCA Parks to a high standard. **Appendix A** includes images of how club members take pride and care of NZMCA Parks.

NZMCA Parks

23. One of the benefits of membership includes exclusive access to NZMCA Parks. The NZMCA develops parks and, where practicable, provides basic amenities to support temporary overnight stays. Basic amenities may include free access to potable drinking water, rubbish and recycling bins, a wastewater dump station, and a common room for members to gather. Outside refuse bins are kept in sheltered areas to improve visual amenity and prevent rubbish from being scattered across the site.
24. While the installation of a wastewater dump station is not necessary for the site to operate, the NZMCA's proposal flags the possibility of installing a dump station down the track, subject to further investigation and costs. We understand that following a submission from Aukaha the Council's 3 Waters team has raised a potential issue with the capacity of the Warrington Wastewater Treatment Plan. The NZMCA will of course collaborate with 3 Waters, and any other Council department, if and when the Association decides to apply for building consent to install a dump station on site.
25. The NZMCA is an experienced land manager with 47 member-only parks currently operating nationwide. These parks are located in urban, residential, reserve, rural, commercial, and industrial environments. Fourteen additional parks are currently under various stages of development and investigation around New Zealand.
26. We understand some submitters are concerned about the level of noise generated from members camping on site and vehicle movements at night. The NZMCA operates several parks in urban/residential areas neighbouring people's homes. To my knowledge, members rarely move to and from our parks at night and if they do noise has not been an issue.
27. The NZMCA owns half of the parks in operation today with the remainder under individual lease, licence, or other land-use management agreements.

These agreements are held with local authorities, the Department of Conservation, Land Information New Zealand, and private landowners.

28. NZMCA Parks are only advertised and made available to financial members. They are not open to the public, nor do they permit permanent residence for NZMCA members. The appearance and operation of a typical NZMCA Park is quite distinct from a conventional public camping-ground. NZMCA Parks are more low-key, generating less noise, vehicle, and pedestrian traffic. NZMCA Parks operate differently to the congested freedom camping areas usually frequented by visitors travelling in small cars / non-self-contained vehicles, or residential trailer parks that are customary in other countries.
29. NZMCA Parks provide a safe space for financial members to park overnight while travelling on the road. Many parks provide members with a place to unwind and enjoy the company of others, while experiencing activities that the local area has to offer. Paragraph 9 of Ken Foote's evidence describes the sites key attributes that members look for, including its proximity to walking tracks, along with a quiet and peaceful environment. Most of our members use parks during their weekend getaways or as short-term stopovers while touring the countryside.

20 BAY ROAD, WARRINGTON

Rationale for purchasing the site

30. The NZMCA has a mandate to acquire land and establish new parks across New Zealand, to meet membership demand. For the past five years, the NZMCA has investigated other prospective sites in Otago to meet membership demand.
31. The NZMCA currently operates a park in a residential area at 57 Woodhaugh Street in Dunedin. While members enjoy staying at this site, it is not large enough to cater for the Association's growth and future needs in the region.
32. As referred to in Ken Foote's evidence, local members have previously camped on the site in their self-contained motorhomes and caravans. Mr. Foote and his Otago Area Committee members recommended purchasing the site due to its safe, convenient, and peaceful location. As locals, they believe members will enjoy visiting Warrington as a destination.

Typical daily use of the site

33. The application provides a detailed description of the proposal, including its future use. Research and observations at other NZMCA Parks suggest members will typically arrive and depart the site during daytime hours. The location of this 'destination' site is such that members would only likely move to and from the site at night in an emergency.
34. Members will park uniformly in one of the parking bays as shown on the site plan. Members are adept at parking in an appropriate and safe manner without the assistance of park markings (see **Appendix A** for example). However, to help minimise ground disturbance and control vehicle numbers the NZMCA will identify bays with small stakes (see **Appendix A**).
35. While on site, members will typically spend most of their time in and around their individual motorhomes, relaxing, reading, or conversing with neighbouring members. Members prefer to keep noise to a minimum as their primary purpose for visiting a park is to be able to unwind and relax in a peaceful environment. This is particularly so for members escaping the pressures of city life for short-weekend getaways. Members may also explore the bay and beach while making use of the public walking tracks.
36. Refuse facilities will be located near the registration kiosk providing easy access for both members and private contractors. Bins will be screened to improve amenity and minimise rubbish scattering across the site.
37. Some members enjoy travelling with their pets. The NZMCA has a policy requiring that dogs are always on leads and cats under control while visiting NZMCA Parks. We also inform members, who may walk their dogs outside the park, to abide by the local dog control bylaws. If necessary, the NZMCA is open to a condition that requires clear dog control signage to be erected on site.
38. In some instances, members may sit together in groups and hold social gatherings that traditionally start at 4pm and last for an hour or two (see **Appendix B**). These social interactions help foster camaraderie and add to the enjoyment of belonging to the NZMCA.

Social and economic benefits (positive effects) for members and Warrington

39. The NZMCA is an official partner of Local Government New Zealand and looks for opportunities to support local communities. The application refers to the potential environmental, social, and economic benefits of the site to members and the Warrington community. These benefits have been observed at NZMCA Parks across the country. Our members and volunteers are, first and foremost, citizens of their own local communities. They take pride in ensuring our parks operate safely, in an appropriate manner, while complimenting the surrounding environment.

40. In 2017, the New Zealand Tourism Research Institute surveyed members and communities at four NZMCA Parks located in rural/provincial towns. The following is a summary of the relevant survey results from the survey undertaken at our NZMCA park in Coromandel:
 - (a) Members stayed on average two nights per visit;
 - (b) 98% of members purchased goods and services during their visit, spending on average \$44.90 per person, per night;
 - (c) Members enjoyed eating out (78%), shopping (68%), and walking (48%);
 - (d) Over 90% of residents and 78% of the business respondents felt the park is good for the local economy, and half of the business operators and residents felt the park helps to create local employment;
 - (e) 91% of residents and 64% of businesses felt the park brought more vibrancy to the local area; and
 - (f) The majority (61% of residents and 78% businesses) felt that their interactions with members were positive for both parties and that Coromandel presents a warm welcome to members.

41. In 2018, the NZMCA commissioned AskYourTeam to survey members on a range of topics including the acquisition and development of more NZMCA Parks. By far the most important attributes in locating new NZMCA Parks are its location, proximity and closeness to the geographical area and facilities. 92% of members commented that they wanted new NZMCA parks to be close to places of interest, e.g., walkways and beaches, and sites with views and scenery. The site meets these requirements.

42. In 2018, the NZMCA interviewed a couple of Mayors of regional towns where NZMCA Parks operate. The NZMCA wanted to gauge their views on the value of a park to their local communities. Follow this link to view the Mayors feedback - https://youtu.be/OtI_bggsf_w.
43. The Mayors discuss the main benefits of having an NZMCA Park established in their respective townships, which include mitigating the adverse effects (e.g., vehicle congestion) commonly found at public overnight parking sites and economic support for local businesses.

MANAGEMENT OF THE SITE

44. The application outlines how the NZMCA proposes to manage the use of the site, which is consistent with its national regime for park management. This regime is modelled off the approach applied by the Department of Conservation.
45. Park custodians are appointed by the Association. Most Parks have a minimum of 2-4 appointed park custodians (depending on the size, use, and location of the site) and between them, they visit the parks on a regular basis, depending on the time of year and popularity of the site. The Park custodians have delegated powers to enforce all park site rules and, if necessary, move members on.
46. Further to this, members are very protective of their membership benefit and will proactively self-police the use of NZMCA Parks if/when required. Members will notify the park custodian(s) or national office if an incident occurs that needs urgent attention.
47. As a not-for-profit organisation, the NZMCA relies on its network of volunteers to promote the club's purpose and goals for the betterment of all members. Every member is expected to abide by the NZMCA's codes of conduct, copies of which were provided with the application. In essence, the codes require members to conduct themselves in a manner that is respectful to fellow members and neighbours alike, while promoting safety, enjoyment, and the protection of our shared environment.
48. The NZMCA has a formal process, including an independent disciplinary committee, to address any misconduct or behavioural issues. Complaints are treated seriously, carefully assessed by the committee, and can result in

the suspension or termination of membership privileges.

CONCLUSION

49. The NZMCA is a well-established, not-for-profit organisation. The very nature of our activity is different in scope and scale to commercial public camping-grounds, hot-spot freedom camping areas, and stereotypical trailer parks. The site will be low-key and provide basic services.
50. The site will accommodate NZMCA financial members who are passive recreational campers and enjoy exploring the country at leisure in their self-contained vehicles.
51. NZMCA members respect the environment, and we expect them to always adhere to the membership codes of conduct alongside the principles of kaitiakitanga. It is in their best interests to protect the environment and ensure the site operates appropriately.
52. As discussed in Kelly Bombay's planning evidence and as referred to in Richard Buxton's section 42A officers report, our proposal will maintain the general undeveloped character of the site, while avoiding the potential for permanent buildings/dwellings associated with residential development. The NZMCA is very mindful of the historical and cultural significance of the site and has therefore proposed to reduce the extent of site development with a view to minimising ground disturbance.
53. The NZMCA's agreement to purchase the site has gone unconditional and we are awaiting new title. We are committed to developing and operating the motor caravan park to a high standard, however if the Council declines this application for consent, or if it introduces conditions that are not workable or acceptable to the Association, the NZMCA will be forced to resell the land. Given the market, we are aware the site may be attractive to a property developer.
54. I ask that you take all these matters into account when making your decision.

APPENDIX A

Woodhaugh NZMCA Park



Planted bunds, Napier NZMCA Park



Drone shot of the Napier NZMCA Park



Overlooking the main non-delineated parking area at the Napier NZMCA Park



Waimate NZMCA Park



Using stakes to help delineate parking bays

APPENDIX B



Members' social gathering while attending a rally in 2017



Members' social gathering while attending a rally in 2018