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November 5, 2020  
File: 310003165

**Attention: Connor Marner**  
[SENT BY EMAIL]  
[connor.marner@dcc.govt.nz](mailto:connor.marner@dcc.govt.nz)

Dear Connor,

**Reference: Supplementary response to request for further information – 20 Bay Road, Warrington  
(Council Ref: LUC-2020-293)**

The New Zealand Motor and Caravan Association (the applicant) has applied to Dunedin City Council (DCC) for resource consents to develop a new site for camping by NZMCA members at 20 Bay Road, Warrington. A part response to your request for further information (RFI dated 18 August 2020) was provided on 18 September 2020. This letter provides a further response addressing items 2, 3 and 4 of the RFI as well as comment in response to the review by Dunedin City Council's (DCC) Environmental Health Officer (dated 13 August 2020).

#### **Item 2: Further details of earthwork activities**

A hui on site at 20 Bay Road, Warrington was had with four representatives of Kāti Huirapa Runaka ki Puketeraki on Saturday 26 September 2020. Ken Foote from the NZMCA and I attended. The hui was for the purpose of discussing the resource consent application and obtain their feedback for the purpose of applying for an archaeological authority and to understand the effects from the proposal on cultural heritage. Following the hui, a letter was sent to Aukaha (dated 12 October 2020) to be passed on to the Runaka which outlined our understanding of the feedback received on site and requested feedback and/or written approval from the Runaka.

The feedback received from Runaka representatives during our hui is summarised below and was focused on the following aspects of the proposal:

- Expressed opposition to any additional discharge to the Warrington Wastewater Treatment Plant; and
- Except for the discharge of wastewater, generally not opposed to the campground activity and supportive of the measures proposed to protect areas in situ that have been identified as being of archaeological significance; and
- Support in principle for an alternative on-site wastewater storage system which would require excavation, provided any excavations could be monitored by a representative/s of Kāti Huirapa Runaka ki Puketeraki.

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We received a response from Aukaha on behalf of Kāti Huirapa Runaka ki Puketeraki (dated 28 October 2020) stating that the Runaka do not provide their written approval. Both letters are provided as **Attachment A** to this response.

Having consulted and obtained feedback from Kāti Huirapa Runaka ki Puketeraki, the NZMCA are now in the process of finalising their application seeking an archaeological authority from Heritage New Zealand Pouhere Taonga (HNZPT).

### **Item 3: Confirm details of Stage 2 (earthworks)**

The area of the site (from the southern end of the driveway) to be used for the Stage 1 and Stage 2 of the proposed campground activity is approximately 9260m<sup>2</sup>. This includes the driveway to the kiosk (780m<sup>2</sup>), circulation areas between lanes (590m<sup>2</sup>), area of archaeological significance (2050m<sup>2</sup>) and balance i.e. majority of Stage 1 area (5840m<sup>2</sup>).

Appendix F of the lodged application (prepared by Stantec, dated 1 July 2020) describes different types of 'paving' which are outlined as follows:

- Pavement Type 1 - Reinforce pavement design calling for the top 50mm of ground to be stripped to remove the existing turf, followed by importing topsoil material to level the site prior to laying of the reinforcement matts, which are backfilled with a further layer of topsoil before sowing grass. Levelling the site would take nominally 100mm of topsoil (not placed uniformly) to remove undulations in the existing surface, plus 50mm of additional topsoil to fill the reinforcement mat.
- Pavement Type 2 (archaeological Significance) – Area is to have a geogrid / geofabric separation layer placed, followed by 100mm of coarse sand, and 200mm of topsoil then grass to be sown.
- Pavement Type 3 - Area to remain as unreinforced grass paddock. Area is to be levelled with a varying depth of topsoil to remove any undulations. Nominal 150mm of topsoil to be placed (not to a uniform layer depth).

The Stage 1 area is proposed to be used from the outset with minimal earthworks proposed. Earthworks will be limited to an area of 760m<sup>2</sup> along the northern aisle (east to west direction) to clear the area of the existing overgrown vegetation (approximately 400m<sup>2</sup>) including gorse which the row of parking is proposed over (see Image 1 below). Earthworks will only be undertaken as required for the row of parking and landscaping along its northern edge. This will involve some fill to be imported as required, where the vegetation is to be removed. We estimate this to be nominally 300mm over the 400m<sup>2</sup> area (fill 120m<sup>3</sup>). A further nominal 150mm of topsoil will be placed (not to a uniform layer depth) to provide a level surface along this parking row (fill 114m<sup>3</sup>).

The planting strip along the eastern side of the parking row for smaller vehicles has an area of approximately 120m<sup>2</sup> (60m x 2m) which will require stripping of the first 100mm of topsoil (cut 12m<sup>3</sup>) and placement of 150mm of topsoil for planting (fill 18m<sup>3</sup>). The planting strip along the northern internal boundary with Kings College will have an area of approximately 195m<sup>2</sup> and will require stripping of the first 100mm of topsoil (cut 20m<sup>3</sup>) and placement of 150mm of topsoil for planting (fill 29m<sup>3</sup>).

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We have identified the area of archaeological significance on the plan title 'Stage 2 Pavement / Reinforced Grass' (see **Attachment B**) which has an area of 2050m<sup>2</sup> over which 'Pavement Type 2' is proposed (Geogrid/Geofabric protection layer, sand, topsoil and grass). Stage 2 will not be used until the 'paving' treatment has been applied. Until that time, the area will be cordoned off from vehicular traffic by temporary cattle fencing (i.e. pigtail posts and tape). This will be communicated through NZMCA site information and enforced by local park custodians.

The balance of the area including the area from the driveway, circulation areas and parking rows, will remain undisturbed and grassed. It is proposed to monitor the ground conditions over the first winter season, in which the consent holder will provide visual documentation (photos) to DCC's monitoring and compliance. Should the integrity of the ground be disturbed, i.e. grass or soil being exposed due to frequent circulation, then Pavement Type 3 shall be considered in the first instance, followed by Pavement Type 1 to remediate the situation.



*Image 1: Gorse and vegetation to be removed for parking row*

The defined earthworks do not change the assessment previously provided against the performance standards in Chapter 8 of the Proposed Second Generation Dunedin City District Plan (2GP).

#### **Item 4: Written approval / Cultural Impact Assessment**

The RFI states that *'As the application does not currently include the written approval from Manawhenua, and Heritage New Zealand, the effects on cultural heritage from the proposal are largely uncertain. A Cultural Impact Assessment is therefore requested to identify any adverse impact on the cultural*

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*significance of the site and to determine, in particular, the effects on Manawhenua and identified wahi tupuna mapped areas’.*

After continued efforts to obtain the relevant approval from Kāti Huirapa Runaka ki Puketeraki, written approval has not been provided for the proposal in its entirety based on their key concern regarding wastewater.

As advised in the letter from Aukaha:

*Kāti Huirapa Rūnaka ki Puketeraki do not feel the current Warrington Wastewater Treatment Plant is fit for purpose. The increased volume of sewage that would be incurred from the proposed campground, will put the Wastewater Treatment Plant under added pressure, furthering the potential of wastewater discharge limit exceedances to Papatūānuku (Mother Earth) and ultimately to Tangaroa (God of Sea/Rivers/Lakes and all that live within them).*

Rule 14.7.1(1) states that where Manawhenua are considered as an affected person, a cultural impact assessment may be required (the notification rules within the relevant management zone, major facility or city-wide activities section provide advice on when Manawhenua will be considered an affected person).

Manawhenua are identified as an affected party in relation to the visitor accommodation being a discretionary activity within the Rural Coastal zoned part of the site pursuant to Rule 16.4(3). It is noteworthy that the visitor accommodation is a restricted discretionary activity within the Residential zoned part of the site and therefore Manawhenua are not considered as an affected party over that part of the site. Consultation with Kāti Huirapa Runaka ki Puketeraki identifies their position with regard to cultural effects.

Given the extent (in terms of split zoning) by which the activities identify Manawhenua as an affected party, the consultation undertaken to date and the identification of the cultural values which are of importance in relation to the proposed activity, we ask that the request for a Cultural Impact Assessment be reconsidered.

In terms of Manawhenua being considered an affected party, an assessment of effects on cultural and historic values has been undertaken in Section 6.2 of the AEE prepared by Stantec dated 1 July 2020. The NZMCA has sought feedback on the mitigation proposed with regard to the heritage of the site. Feedback received from the four representatives during the hui on site was that generally they were not opposed to the campground activity and supportive of the measures proposed to protect areas in situ that have been identified as being of archaeological significance.

Following the hui, and as outlined in our letter to Aukaha dated 12 October 2020, we now have a better understanding of the fundamental concerns held by the Runaka with regard to the management of wastewater in Warrington. Runaka representatives advised that as far as they were aware the DCC has for some time been in breach of nitrogen discharge limits set by their Otago Regional Council resource consent (Ref: 2006.861). We understand that to this end, any additional reliance on the public wastewater system (which conveys wastewater to the Warrington oxidation pond) is opposed by the Runaka.

In response, NZMCA has considered options for on-site wastewater storage and removal off-site or disposal on-site via dispersal fields. These options are still being investigated and may form part of NZMCA's long term plan for the site. NZMCA recently installed a 25,000L holding tank at a park in Christchurch with a telemetry system which notifies a local contractor when the tank needs emptying. The effectiveness of this system is being monitored before rolling it out to other parks. If successful, this could

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be an option for Warrington. An option like this at Warrington would be costly and would take time and careful planning to work through. As such, it is difficult for NZMCA to commit to installation of an on-site wastewater system at this stage in the consent process as the ability to use the site is uncertain.

In addition, the discharge permit held by DCC for the Warrington Wastewater Treatment Plant will expire within the next few years. NZMCA therefore want to consider the costs versus the benefits of installing a system in light of any upgrades that may be proposed by DCC for the management of wastewater for the Warrington community.

The resource consent application currently proposes that members will utilise the existing dump station in the Warrington Domain, with plans to establish another dump station on the site at 20 Bay Road in the future. We understand use of the existing dump station in the Warrington Domain is still a concern for the Runaka as wastewater is conveyed from the dump station to the Warrington Wastewater Treatment Plant. We note however, that in September, NZMCA received a copy of a report from DCC (refer **Attachment A** of the letter sent to Aukaha dated 12 October). Figure 1 of the report suggests the community can expect a significant reduction in the number of freedom campers visiting the domain over the next few years (due to border restrictions). A review of the Camping Control Bylaw 2015 was discussed at a DCC public meeting on Friday 31 January 2020. Meeting minutes identified a 36% reduction in the volume of freedom campers at Warrington over the 2018/2019 season due to other options being available to freedom campers that summer in Dunedin. NZMCA members also make up a proportion of the number of people in caravans and self-contained motor vehicles visiting the Warrington Domain.

If 20 Bay Road is not used by NZMCA as a campground for members, then members will continue to use the alternative site at the Warrington Domain and the dump station which is available. By establishing the proposed campground, NZMCA will have the ability to encourage members to discharge their waste tanks at one of the many other dump stations in the region (refer **Attachment B** of the letter sent to Aukaha dated 12 October). Therefore, in addition to the anticipated decreased use of the Warrington Domain, this will assist in reducing the waste discharged to the Warrington dump station at least in the short term. For these reasons, the effects on Manawhenua are assessed to be less than minor.

#### **Item 5: Noise assessment**

The DCC Environmental Health Officer (EHO), Tanya Morrison, has provided a memo outlining her review dated 13 August 2020. The memo concludes that *“Environmental health has no concerns over the granting of this consent from a noise point of view, however would agree with the proposed condition by the applicant for limiting the use of gas generators between 8pm and 8am on any given day. In addition, Environmental Health would like a condition of consent (if success) to be that dump station facilities be installed/available onsite for campers to use”*.

In response to the EHO's comment regarding the dump station, the NZMCA operate several motorhome parks nationwide without dump stations on site. Further to correspondence with Carlo Bell (DCC Team Leader Environmental Health) the NZMCA will apply for an exemption to the Camping Ground Regulations. Carlo has indicated that DCC would not consider an application for exemptions until a decision had been made on the consent. Therefore, it is not considered necessary to provide a dump station for the purpose of the consent and the exemption will be considered as part of a separate process from the resource consent process.



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Furthermore, as discussed above, consultation with Kāti Huirapa Rūnaka ki Puketeraki raised concerns regarding discharge to the existing public wastewater infrastructure. We have sought clarification from DCC (email to Jakob Kochan 5/11/2020) as to any issues with the use of the existing wastewater infrastructure, namely the existing dump station at the Warrington Domain and any future installation of a dump station at 20 Bay Road.

Notwithstanding, NZMCA propose that instead of adding to the issue as raised by the Runaka, they will encourage members to discharge their waste tanks at one of the many other dump stations in the region. Therefore, in addition to the anticipated decreased use of the Warrington Domain, this will assist in reducing the waste discharged to the Warrington dump station at least in the short term.

### Summary

In terms of addressing the matters raised in the RFI, we trust the information provided to date now satisfies items 1, 3 and 5 in full. We will report on our progress in obtaining the relevant approval from HNZPT in response to Item 2. We await further confirmation from you regarding the assessment of item 4 and the request for a Cultural Impact Assessment.

Please contact me via email ([kelly.bombay@stantec.com](mailto:kelly.bombay@stantec.com)) or phone 03 341 4719 should you wish to discuss any of the responses provided to date or the proposed way forward regarding the outstanding matters.

Regards,

**Stantec New Zealand**



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Attachment A: Consultation with Aukaha

Attachment B: Plan 'Stage 2 Pavement / Reinforced Grass'