



Stantec New Zealand
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Addington
Christchurch 8024
NEW ZEALAND
Mail to: PO Box 13052, Christchurch 8141

October 12, 2020
File: 20 Bay Road, Warrington

Attention: Tania Richardson
Aukaha
Level 1, 258 Stuart Street
PO Box 446
Dunedin 9054
NEW ZEALAND

Tēnā koe Tania,

Reference: Proposed NZMCA campground at 20 Bay Road, Warrington

Further to my letter dated 21 May 2020, I am writing to you following a hui on site at 20 Bay Road, Warrington with four representatives of Kāti Huirapa Runaka ki Puketeraki on Saturday 26 September 2020. The hui was for the purpose of discussing the resource consent application recently submitted to Dunedin City Council (DCC) by New Zealand Motor Caravan Association (NZMCA) for use of the site by members in their caravans and motorhomes as they travel around the country. We would like to extend our thanks to Brendan, Suzi, Hinerangi and Suzanne for taking the time to meet with us on their weekend, sharing their knowledge of the site and the Warrington area and their openness to discuss their views of the proposal.

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

- Expressed opposition to any additional discharge to the Warrington Wastewater Treatment Plant;
- 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.

Discharge to Warrington Wastewater Treatment Plant

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 be an option for Warrington. An option like this at Warrington would be costly

Reference: Proposed NZMCA campground at 20 Bay Road, Warrington

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, as you are aware, the discharge permit held by DCC for the Warrington Wastewater Treatment Plant will expire within the next few years. NZMCA also wants 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 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 (provided as **Attachment A**). 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 (see map taken from the NZMCA website, provided as **Attachment B**). 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.

Campground activity and physical works

We discussed aspects of site use and management which were generally outlined in our last correspondence (dated 21 May 2020) and provided clarification around site security. Provision of a gate is proposed, with a dual locking system for both NZMCA members and Kings College to gain access to the site via the driveway.

In order to minimise the potential to uncover or disturb heritage artefacts NZMCA is proposing to provide a capping solution/barrier over the surface area identified to be of Archaeological Significance. The area where this treatment is proposed is 2050m² and is shown on the plan attached (**Attachment C**) which we discussed during our visit. It is proposed to have a geogrid / geofabric separation layer placed over the area, followed by 100mm of coarse sand, and 200mm of topsoil then grass to be sown. This will result in fill of approximately 620m³ (205m³ of sand, and 415m³ of topsoil). Further details of the ground treatment are provided as part of the resource consent application prepared by Stantec, dated 1 July 2020, which the Runaka were provided with a copy of on site.

We understand that the Runaka are supportive of the proposed land treatment and would like to have a representative present during any physical site works. Attached is a copy of the conditions proposed as Appendix K of the consent application (see **Attachment D** of this letter). I have made specific mention of Kāti Huirapa Runaka ki Puketeraki in condition 14.

Reference: Proposed NZMCA campground at 20 Bay Road, Warrington

Additional ground excavations

We understand that while the site and what is underneath holds significance, the Runaka are supportive in principle of an alternative on-site wastewater storage system, even if that system requires excavation. As above, NZMCA agrees that a representative/s of Kāti Huirapa Runaka ki Puketeraki will be invited to monitor any ground excavations as part of an on-site underground wastewater storage facility. As outlined above, NZMCA proposes to monitor the situation with regard to the trial at another NZMCA campground as well as the plans for the upgrade of the existing Warrington Wastewater Treatment Plant before committing to any on-site underground wastewater storage facility.

Next steps

NZMCA plans to submit an application to Heritage New Zealand Pouhere Taonga (HNZPT) for an archaeological authority. The authority is required by a condition of both the subdivision consent¹ and land use consent² recently obtained by the current landowner, as discussed in our previous letter. Therefore, with regard to the heritage of the site we are seeking comment and support from Kāti Huirapa Runaka ki Puketeraki to enable NZMCA to undertake this process to obtain an archaeological authority from HNZPT.

In terms of the resource consent application made by NZMCA we are seeking comment and support regarding the proposed campground activity at 20 Bay Road. We acknowledge that comment and support from the Runaka may be conditional. In summary, NZMCA is not able to commit to the time and cost of providing an on-site wastewater system in the short term given the uncertainty of the use of the site as well as future plans by DCC to upgrade the Warrington wastewater infrastructure. NZMCA proposes to volunteer a condition to encourage members to discharge their waste tanks at one of the many other dump stations in the region. NZMCA will continue to monitor the effectiveness of the wastewater facility being trialled in Christchurch and will monitor the DCC's strategy for wastewater infrastructure upgrades.

Nāku noa, nā



Kelly Bombay
Senior Planner
Stantec NZ
Phone: +64 3 341 4719
Kelly.Bombay@stantec.com

Includes attachments A – D

¹ Obtained by Mr Hatherley (SUB-2018-148) to subdivide the property creating three freehold lots subject to conditions.

² Obtained by Mr Hatherley (LUC-2018-555) authorising the use of the existing Kings High School facility subject to conditions.

ATTACHMENT A

Attachment B

Freedom Camper Visitor Survey Findings Report 2019/2020

Between November 2019 and May 2020, Community Rangers distributed 360 surveys to freedom campers in Dunedin. These campers were approached at the Warrington Domain, Thomas Burns Trial Site, Ocean View Reserve and Brighton Domain; Dunedin's most popular freedom camping sites which accommodate approximately 75% of freedom camping visitors.

Surveys included a map showing the Dunedin district boundary and the findings within this report pertain to this area, unless otherwise stated. Community Rangers remained onsite while surveys were completed and were available to assist if campers were having trouble with survey questions.

Here is the key information:

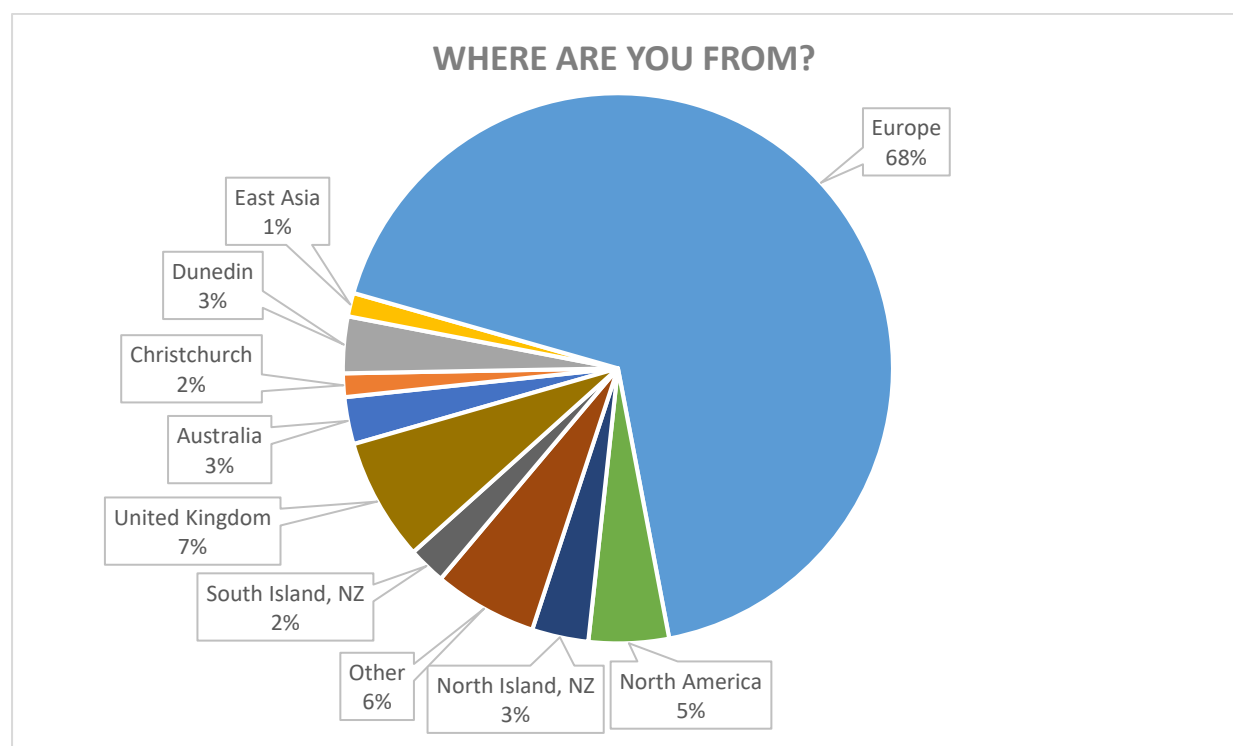


Figure 1

Europeans accounted for 68% of those surveyed with campers from the United Kingdom (7%) and North America (5%) making up the second and third-largest groups. Campers from New Zealand made up 10% of participants.

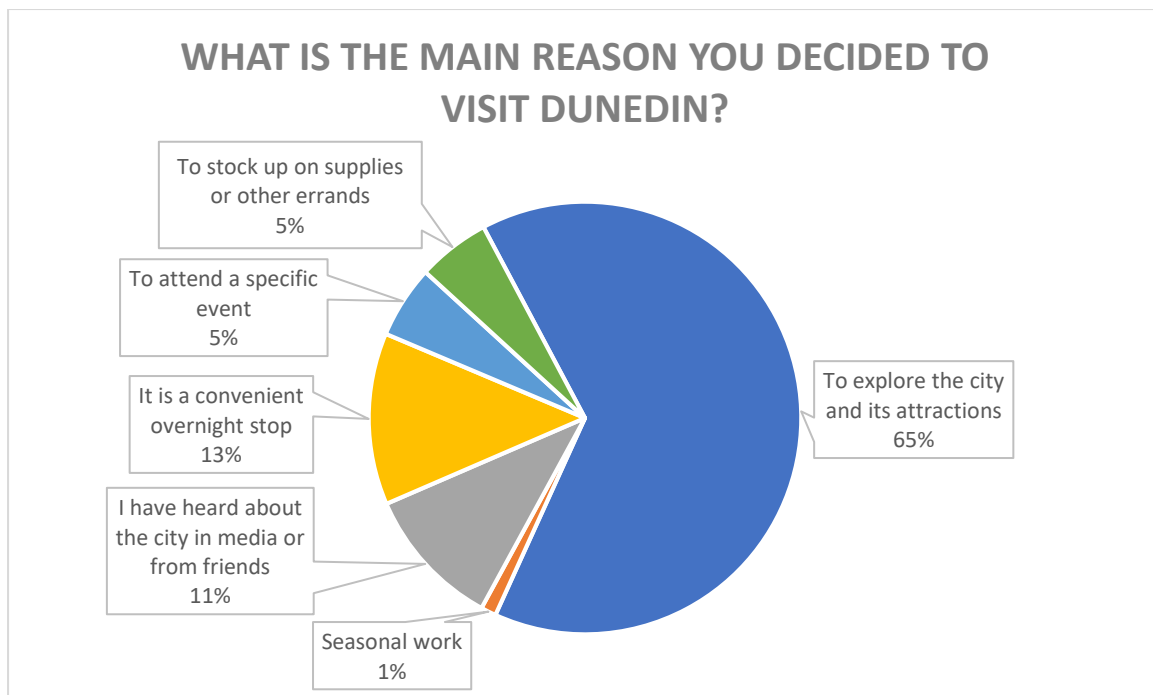


Figure 2

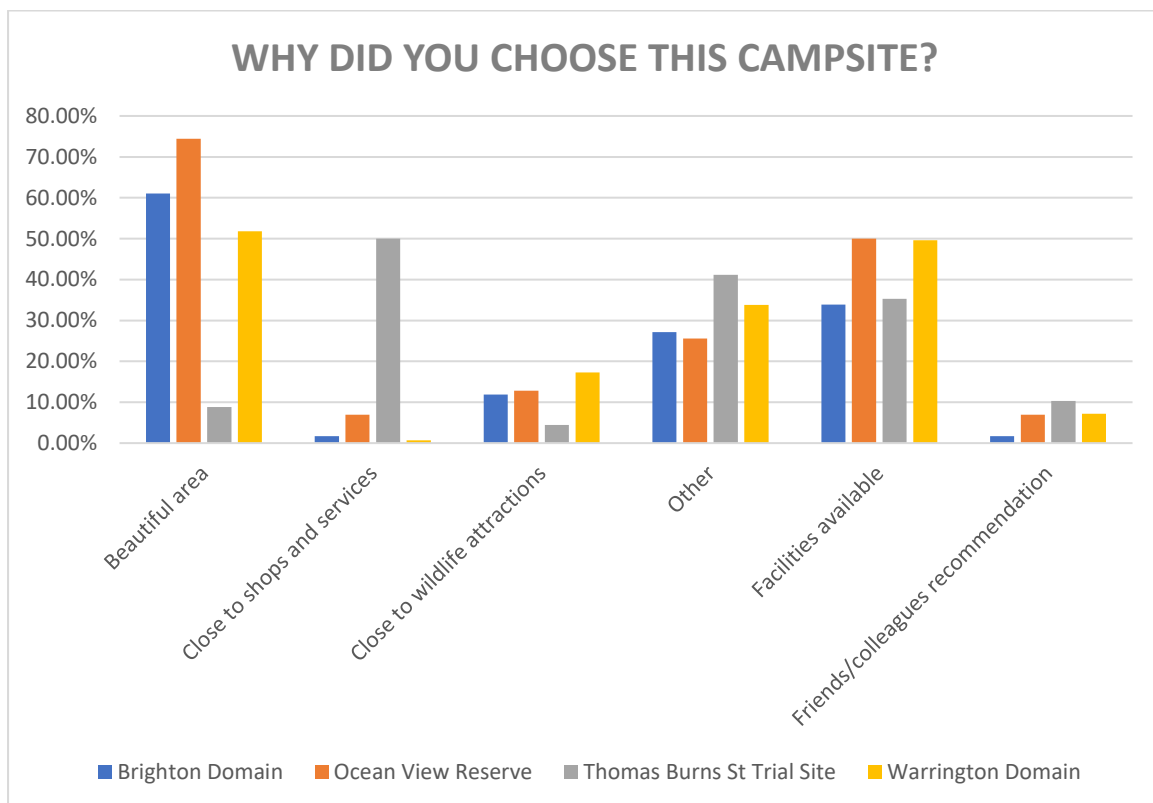


Figure 3

The Warrington Domain, Ocean View Reserve and Brighton Domain were primarily selected by campers who were attracted to the beauty of the area while the Thomas Burns site was popular due to its proximity to shops and services.

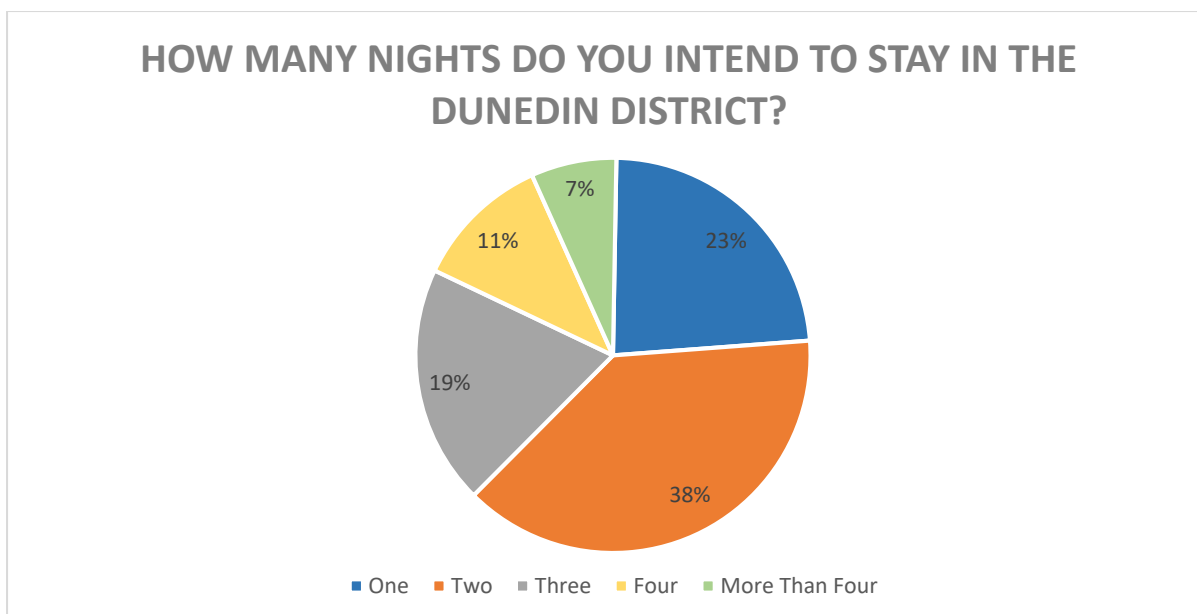


Figure 4

The average camper planned to stay 2.7 nights in the Dunedin district and had spent 2 days in the district at the time the survey was completed.

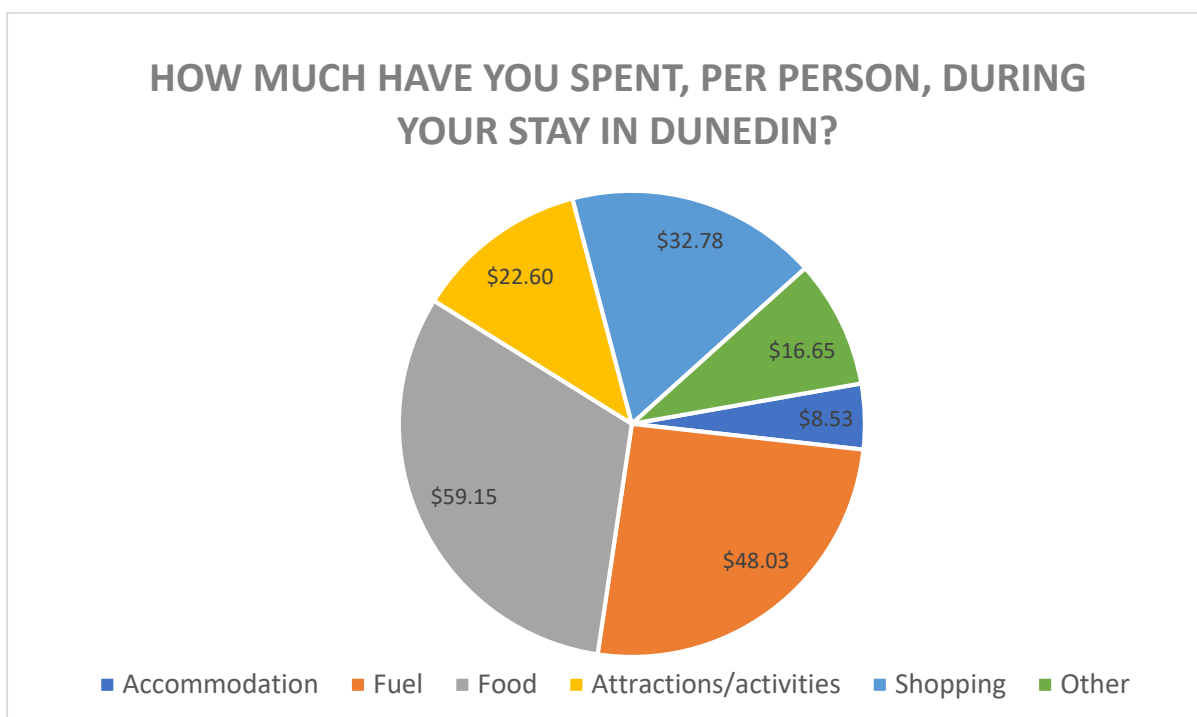


Figure 5

The average camper had spent \$175.69 in the Dunedin district when surveyed. By factoring the time campers had spent in Dunedin when surveyed we calculated an average daily spend of \$85.94 per person. A total of 21,661 freedom camping vehicles were counted citywide during the 2019/2020 camping season. By factoring the average number of occupants per vehicle and average daily spending data we can estimate a total economic contribution of \$3.7m over the 2019/2020 camping season.

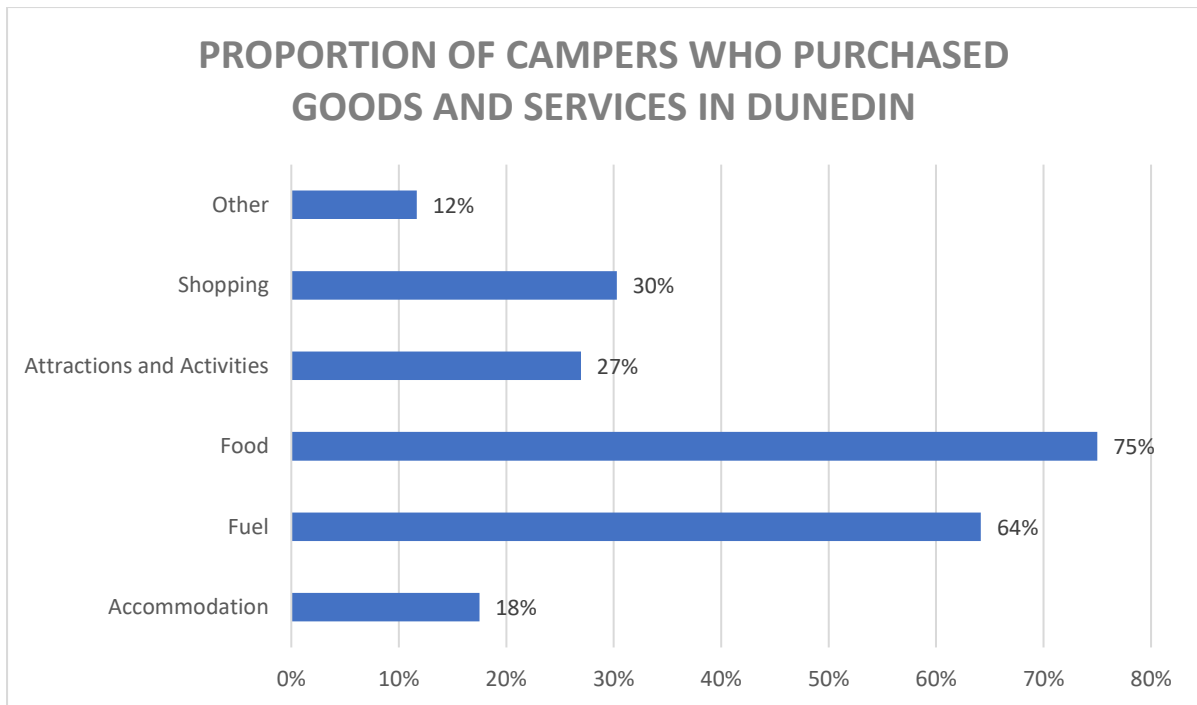


Figure 6

The majority of campers had purchased food and fuel in the Dunedin district when they were surveyed.

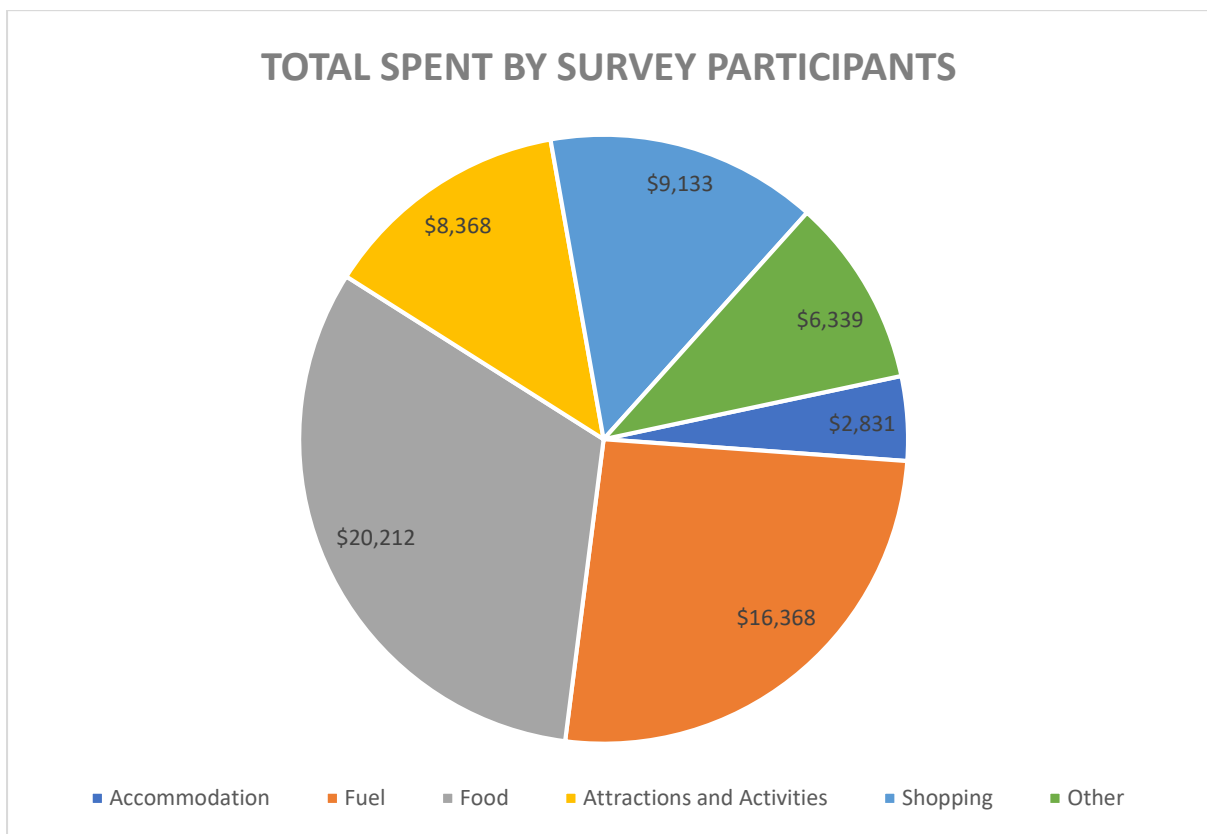


Figure 7

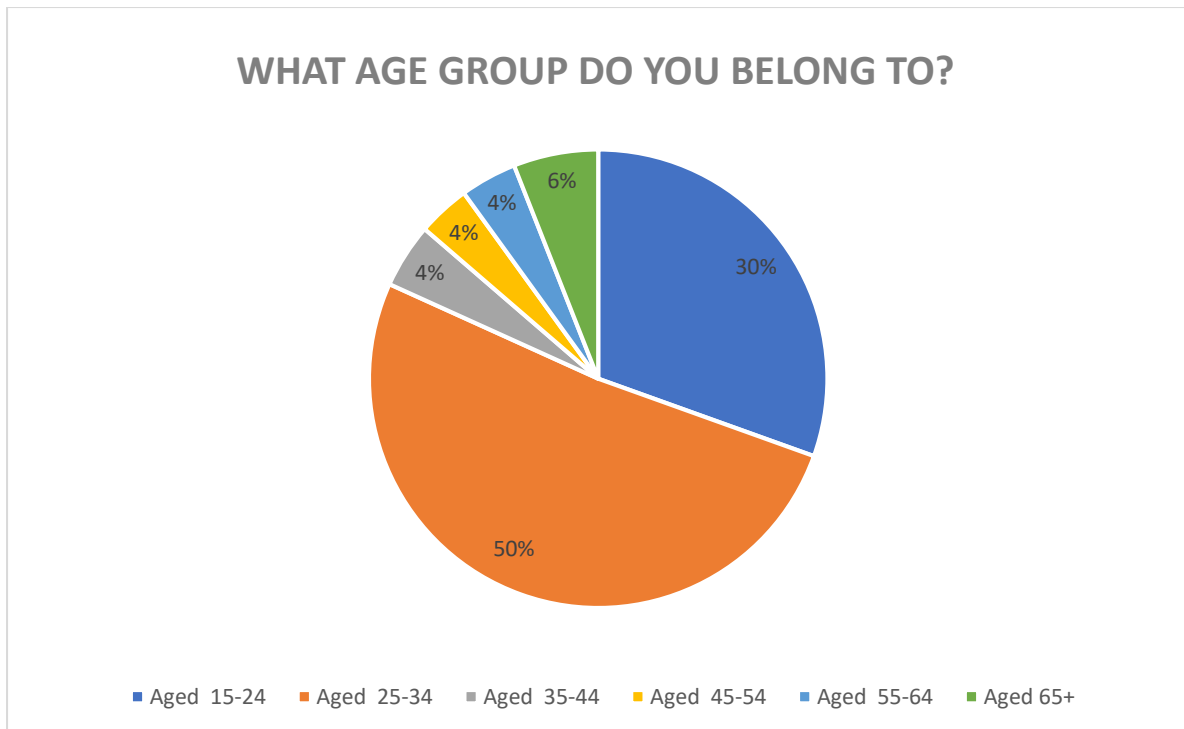


Figure 7

Data referring to age groups should be treated with care, especially those ranges above 35 years of age due to small sample sizes. Of the 360 campers surveyed, only 64 were 35 years of age or older.

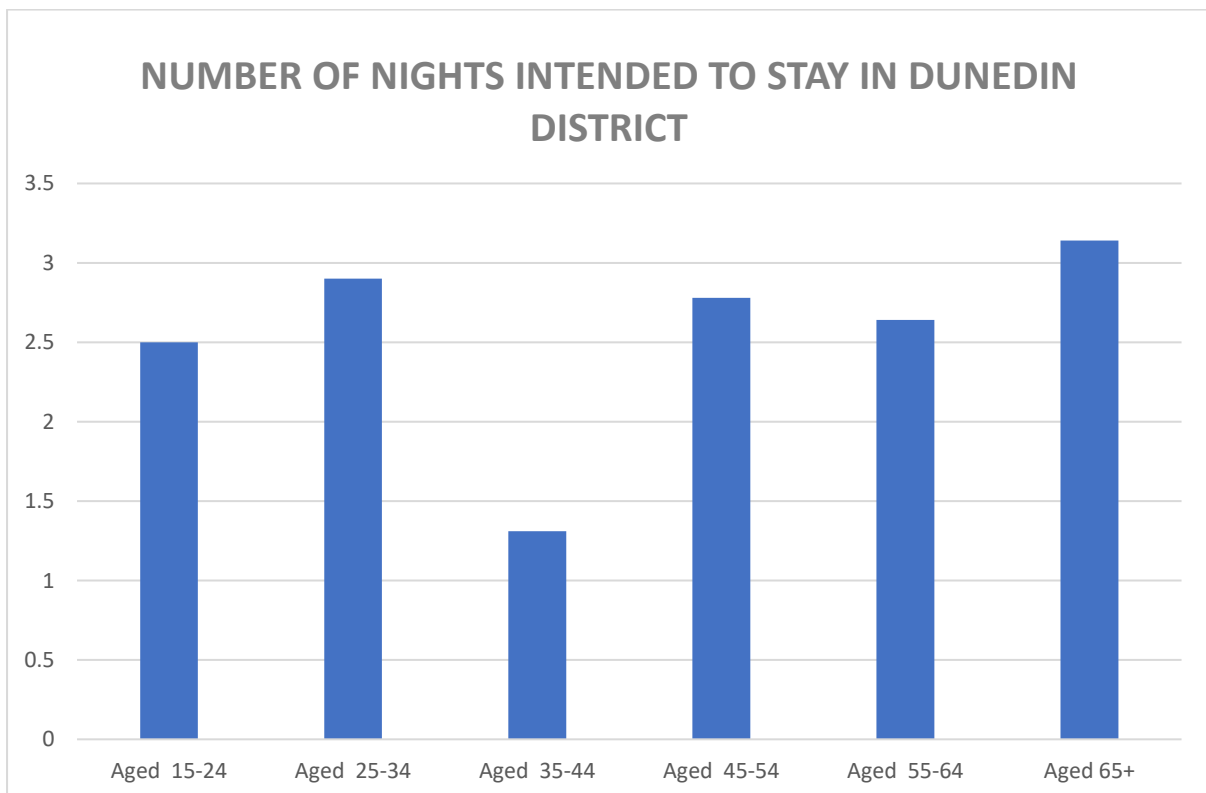


Figure 8

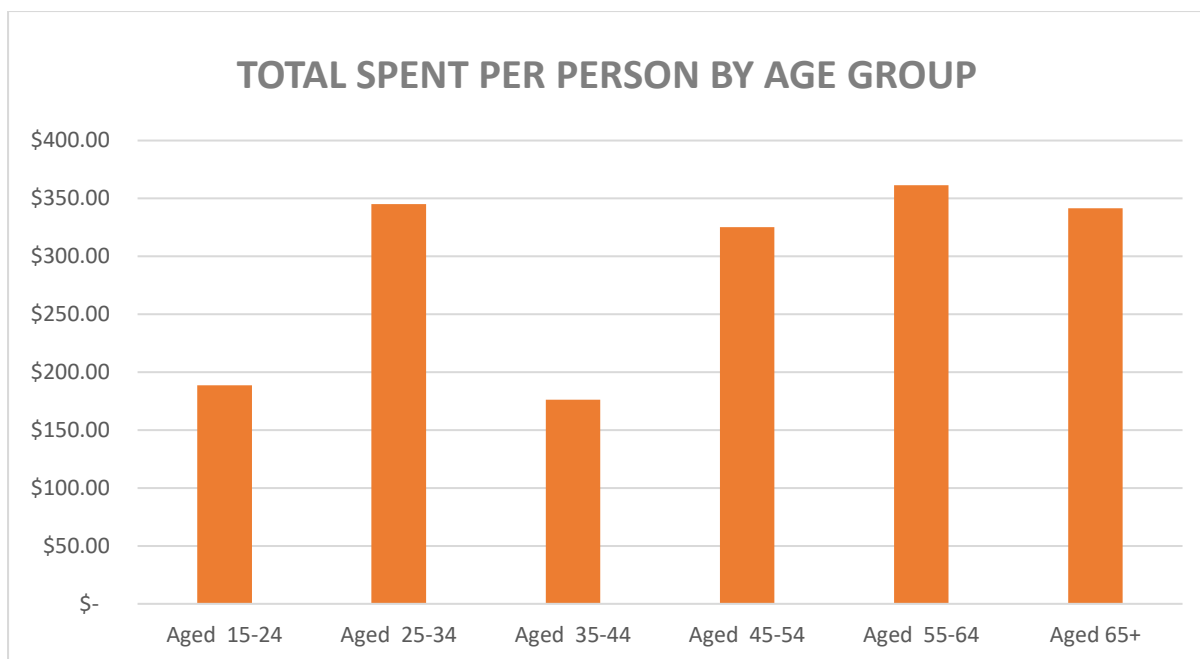


Figure 9

This graph shows the average total amount spent by campers of various age groups during their stay in the Dunedin district. These figures consider the average daily spend and average length of stay of campers within these age ranges.

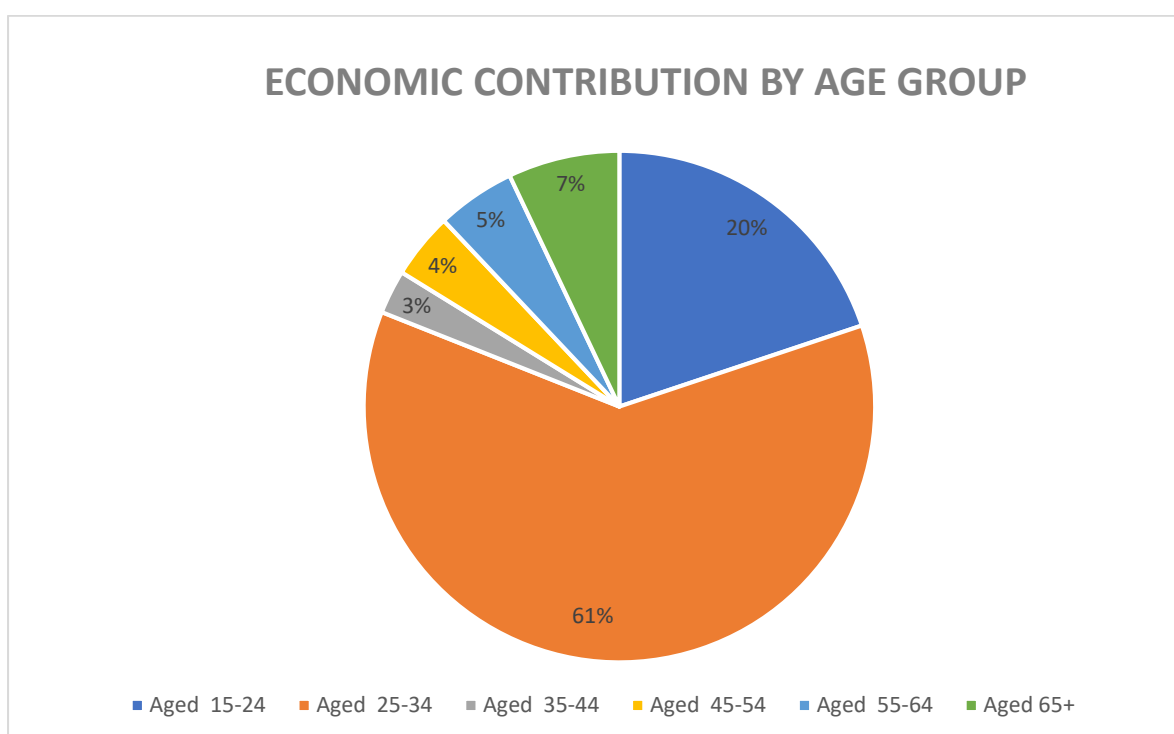


Figure 10

This graph shows the economic contribution of various age groups of freedom campers during their stay in the Dunedin District. It considers average daily spend, average length of stay and the proportion of campers within the various age ranges.

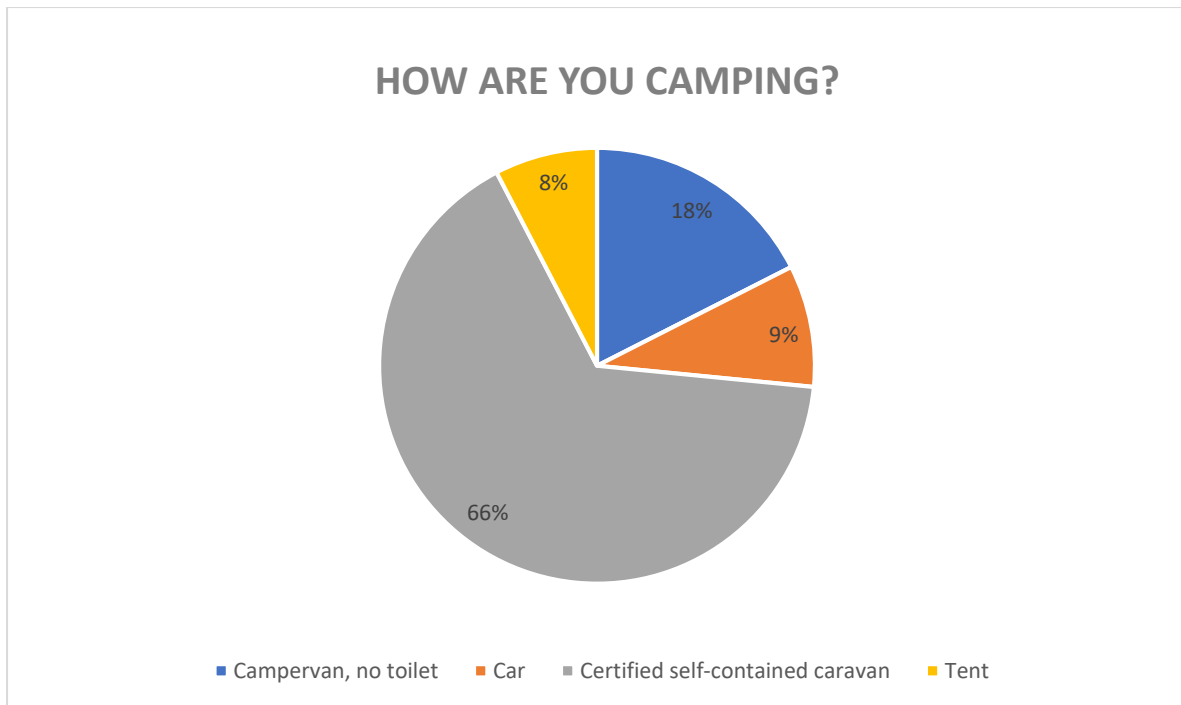


Figure 11

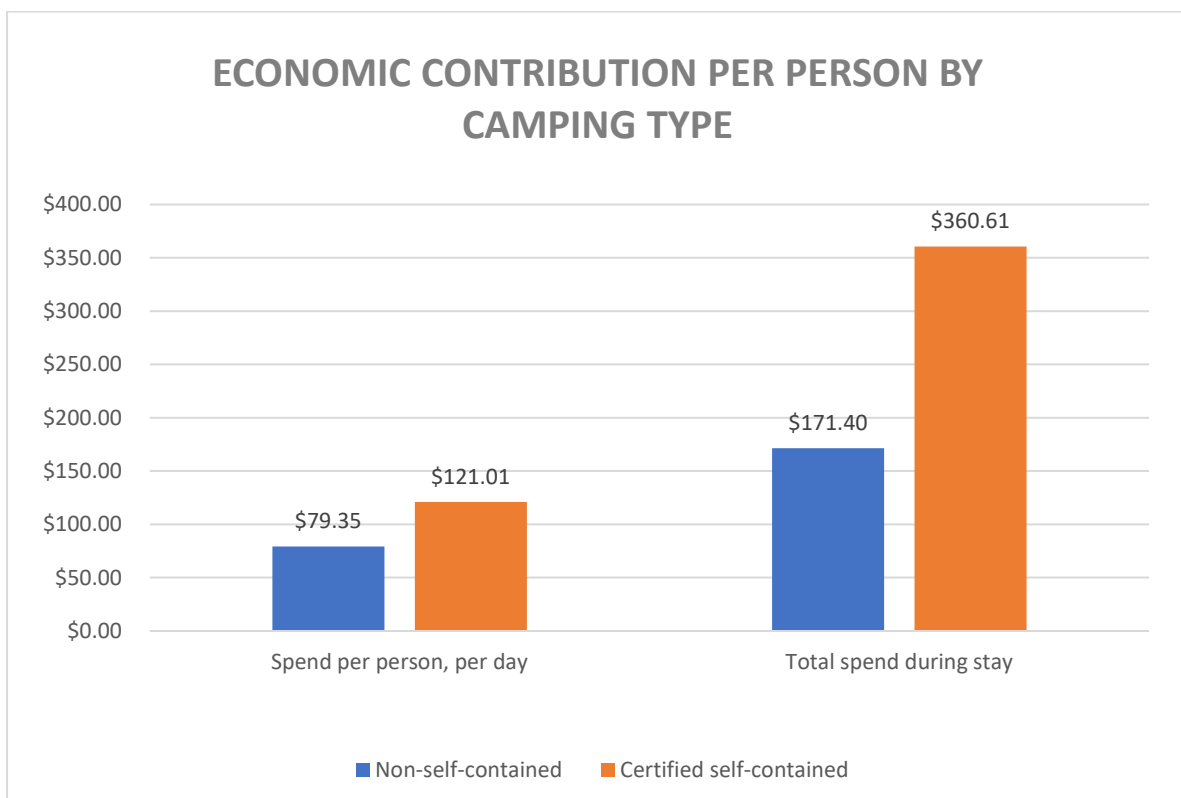


Figure 12

Campers traveling in Certified self-contained vehicles spent more per day and stayed longer than those campers who were non-self-contained, leading to a greater overall economic contribution per person.

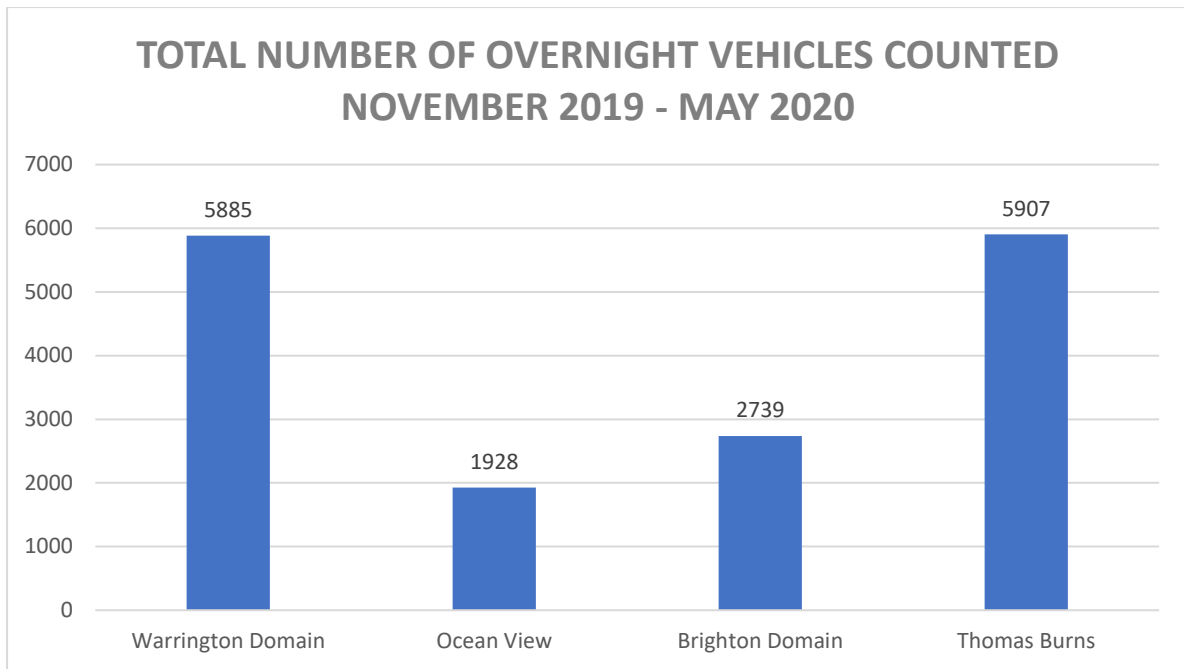


Figure 13

This data was collected outside the survey but included to show the volume and distribution of campers during the 2019/2020 season.

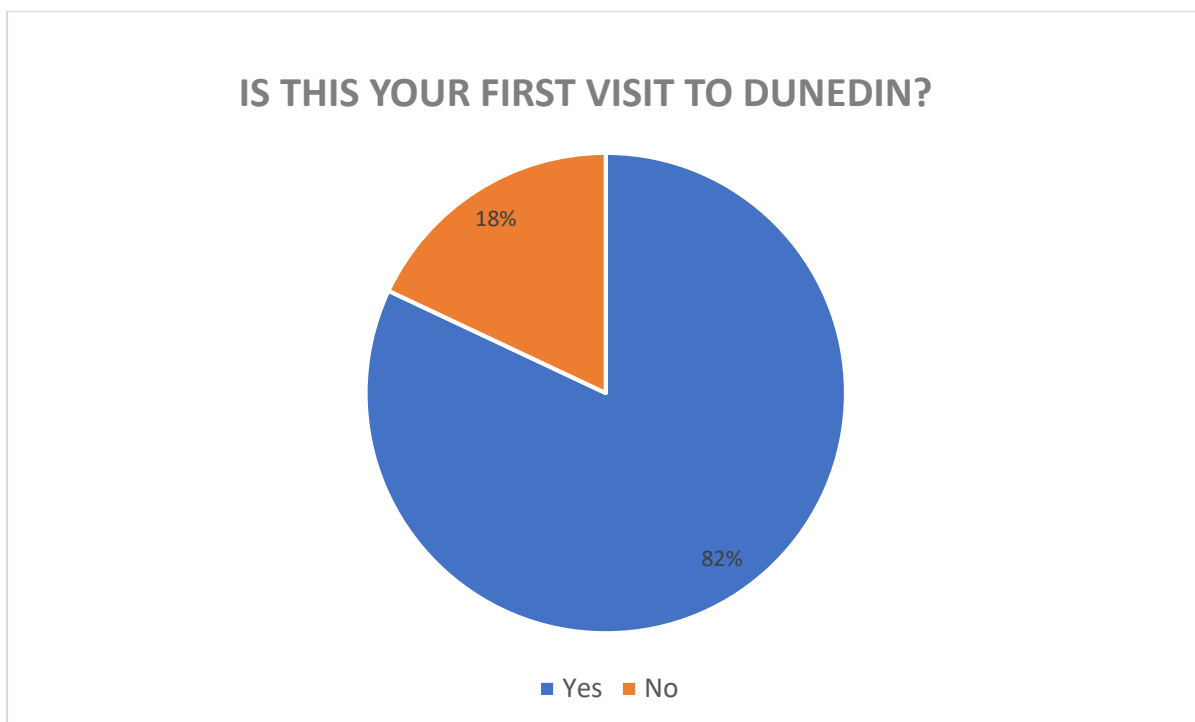


Figure 14

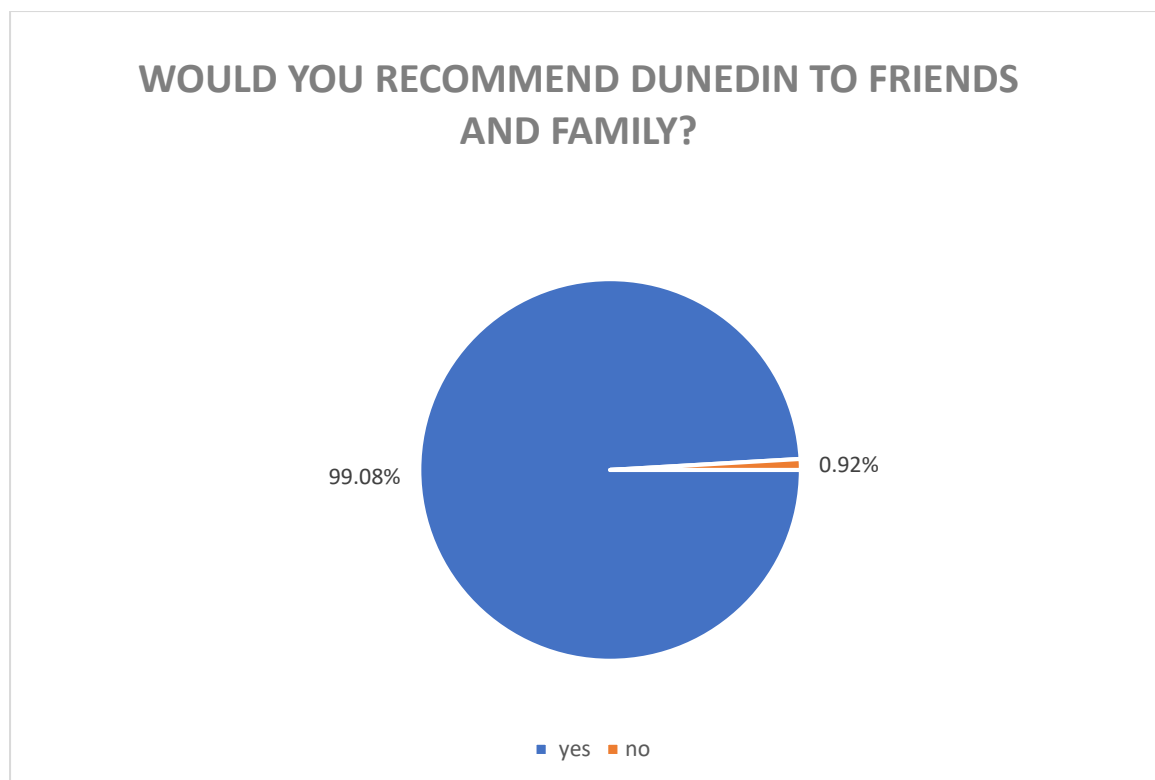


Figure 15

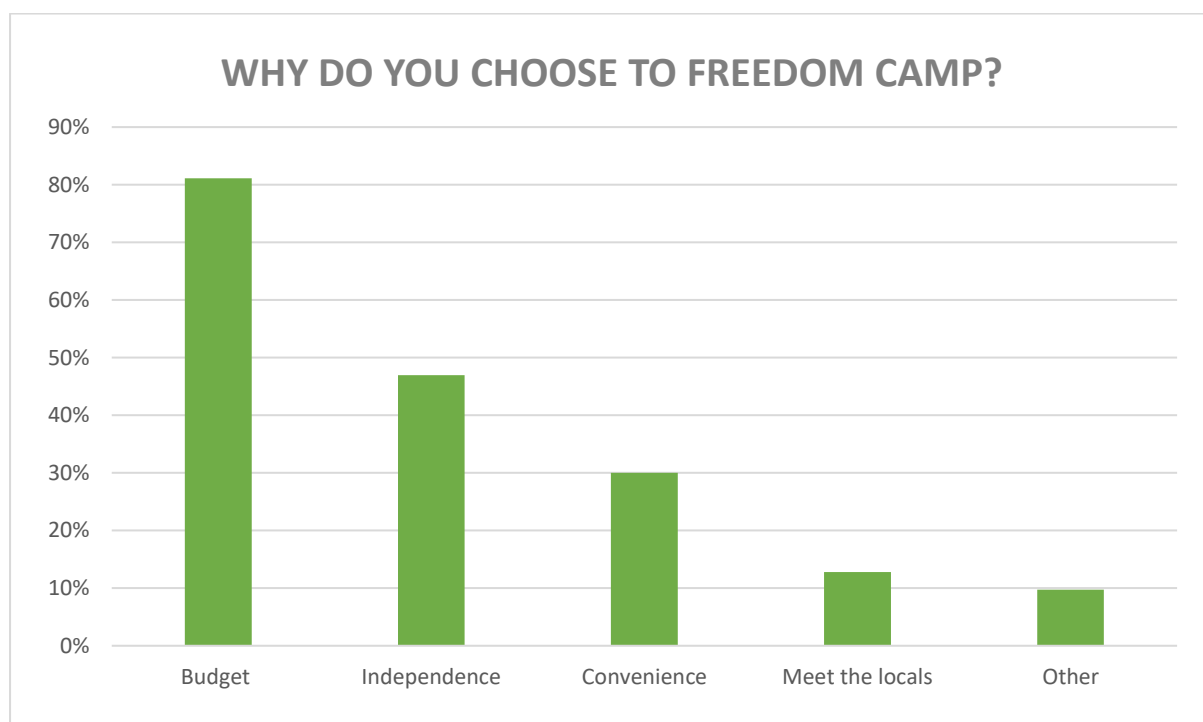


Figure 16

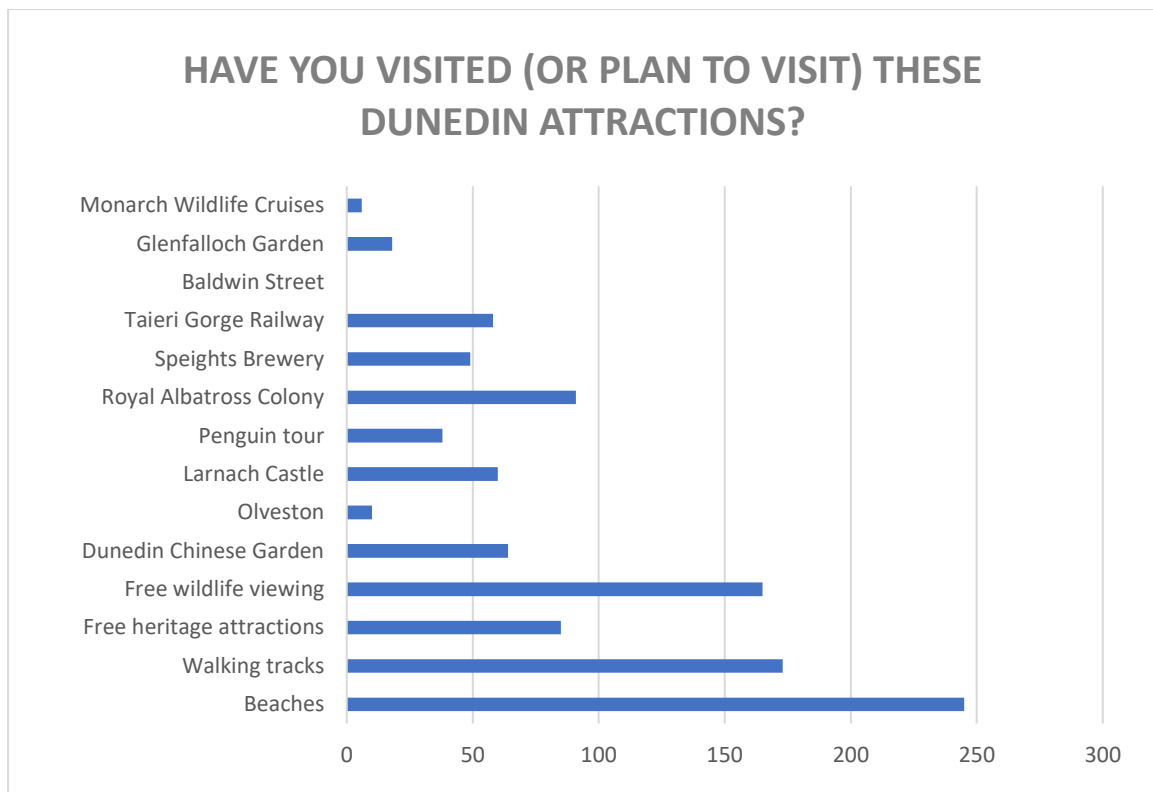


Figure 17

Comparisons with 2018/2019 Freedom Camper Visitor Survey

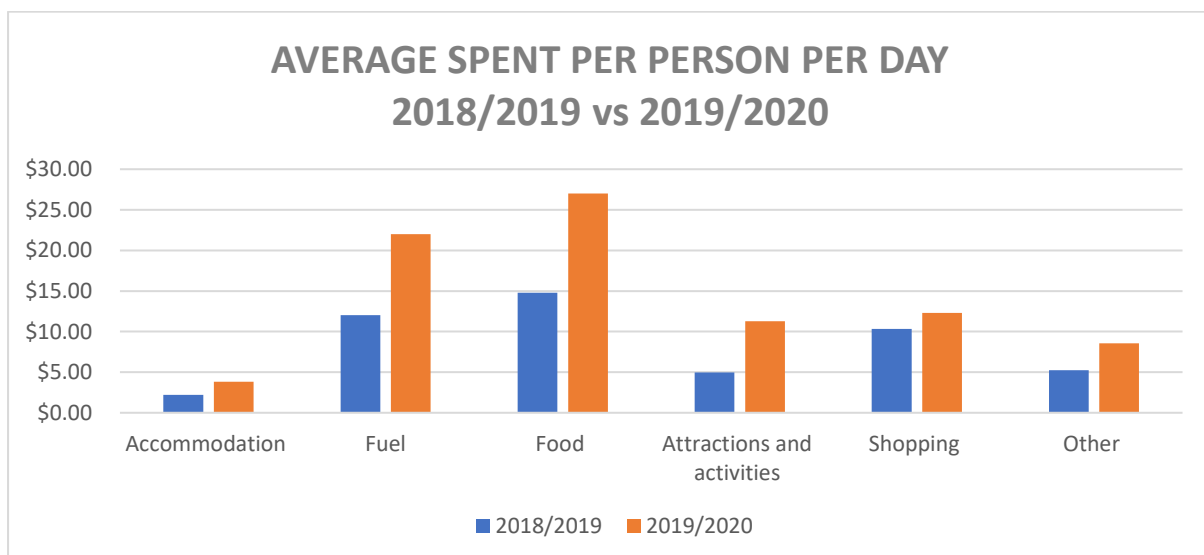


Figure 18

Results from the 2019/2020 survey were well aligned with those from the 2018/2019 survey and variations greater than 5% were rare. An exception was the daily expenditure amount which increased by 73% from \$49.60 to \$85.94 per person, per day. This increase is likely due to participants being better informed of the Dunedin district boundary and reporting expenditure that may have been considered 'outside Dunedin' in the previous season.

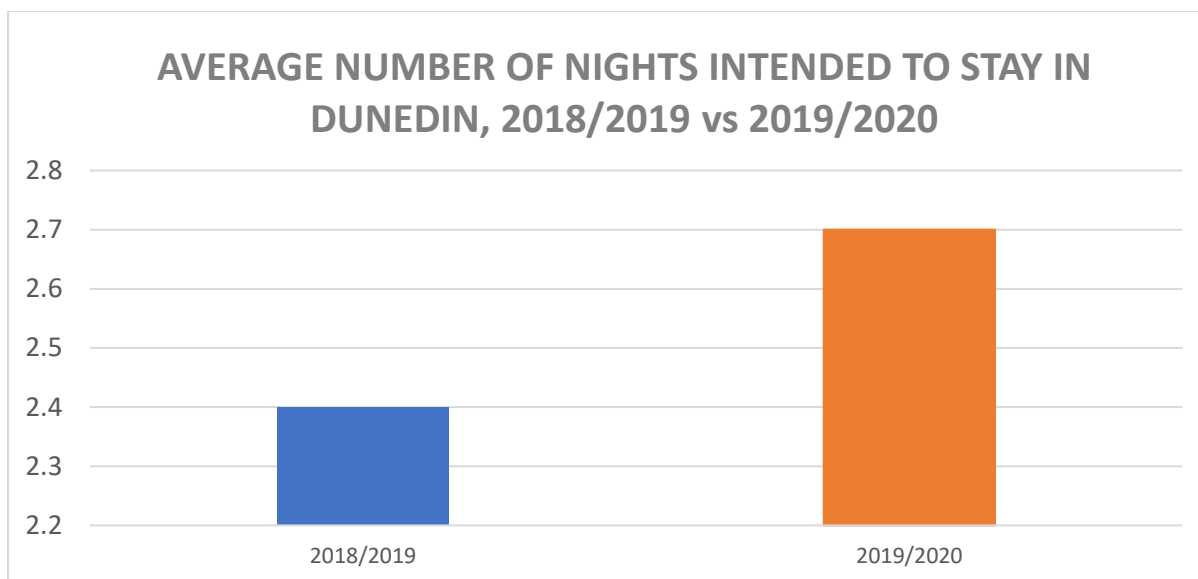


Figure 19

There was a 12% increase in camper's intended length of stay in Dunedin from 2.4 nights to 2.7 nights. This increase may also have been affected by campers having a better understanding of which locations were within the Dunedin boundary.

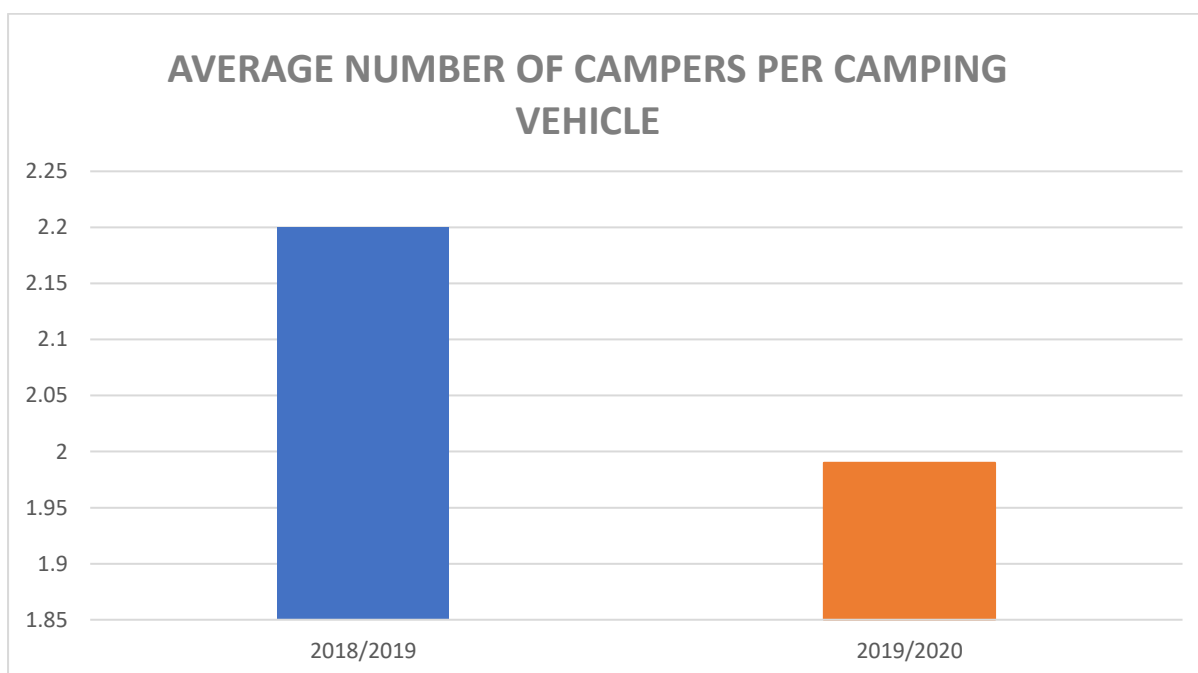


Figure 20

There was a decrease in the number of campers per vehicle reported during the 2019/2020 season. Nightly vehicle counts, intended length of stay and numbers of campers per vehicle can be used to estimate the number of distinct camping vehicles and campers visiting Dunedin. During the 2018/2019 season an estimated 13,600 freedom camping vehicles visited the city with 30,100 campers onboard. In the 2019/2020 season this decreased to 11,300 vehicles with 22,300 campers onboard.

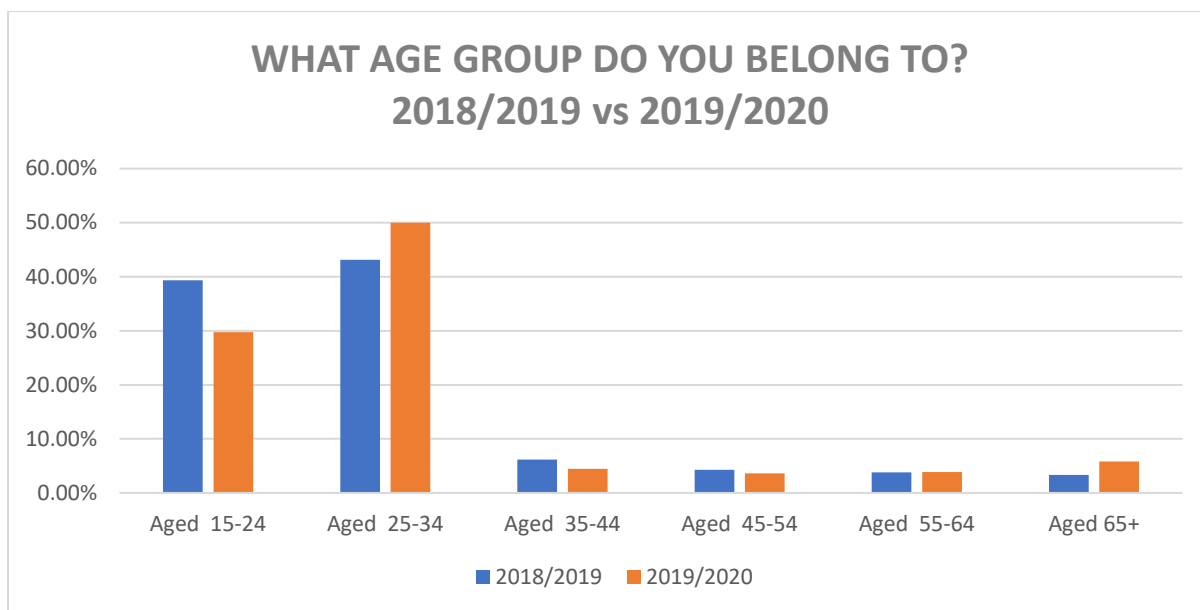


Figure 21

Campers who responded in the 2019/2020 survey were slightly older than respondents from the previous season.

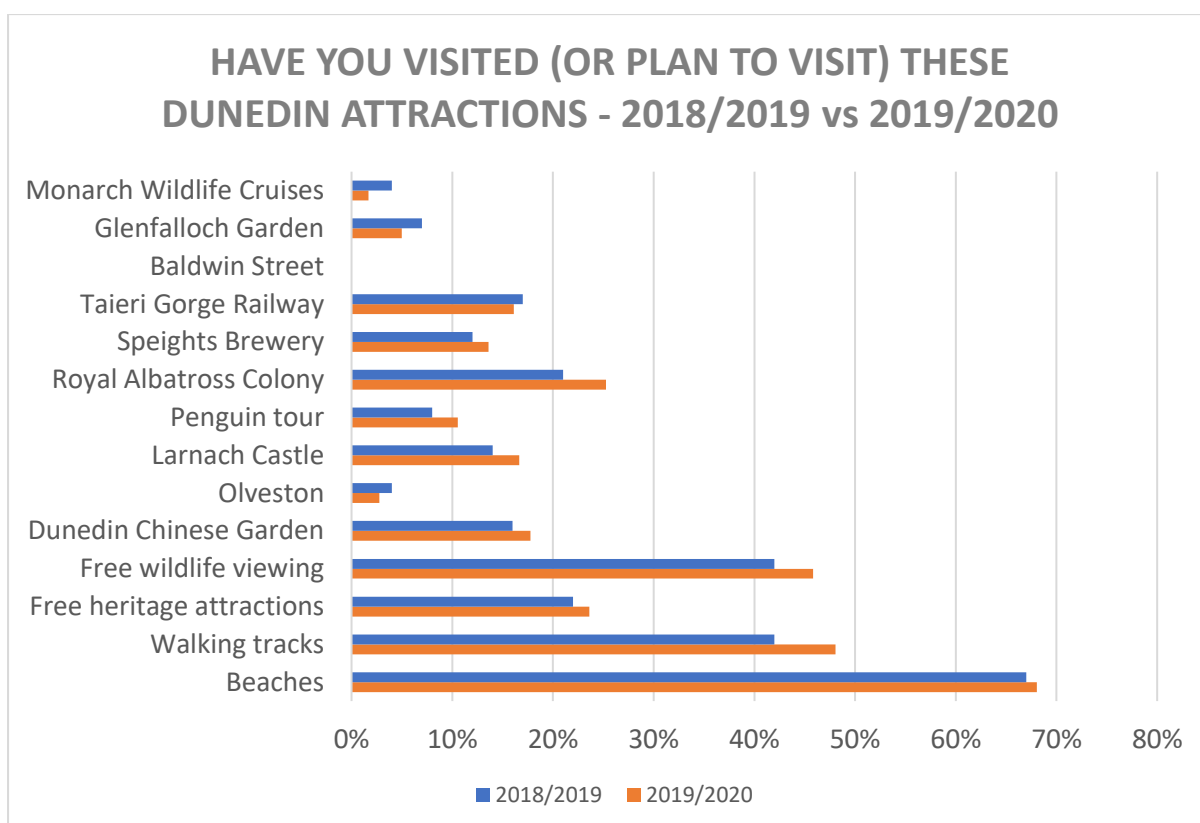
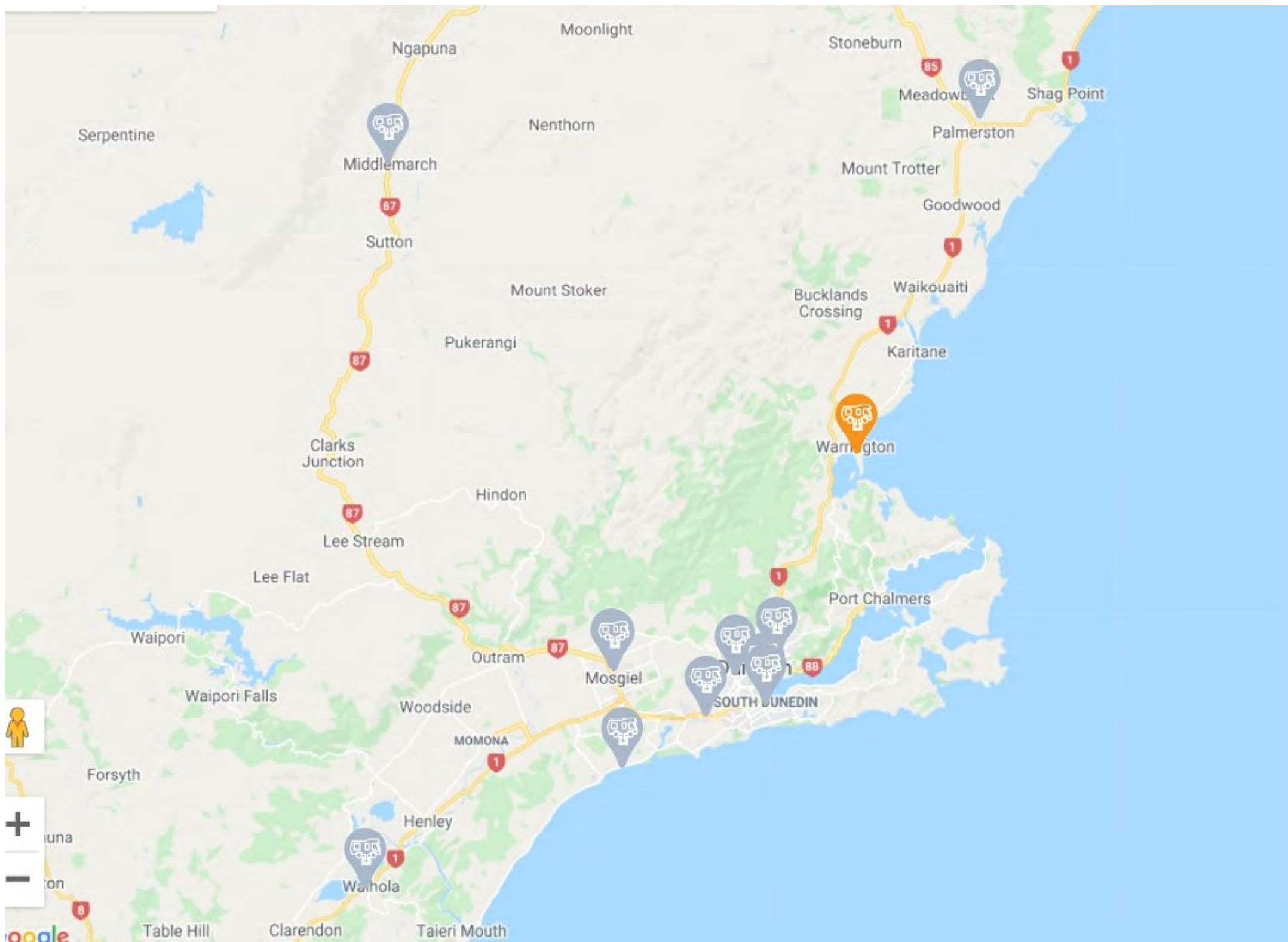


Figure 22

Respondents in both surveys planned to visit 3.4 Dunedin attractions during their stay. Dunedin's free attractions drew the most visitors and the Royal Albatross Colony was the most popular paid attraction.

ATTACHMENT B



ATTACHMENT C



Status Stamp	SKETCH	
Date Stamp	15.09.20	
Scales	AS SHOWN	
Drawing No.	310003165-01-001-SK004-1	Rev. A

						SURVEYED		
						DESIGNED		
						DRAWN	NIGEL LISTER	15.09.20
						CAD REVIEW		
						APPROVED		
A REV	FOR REVIEW		NL DRN	KB CHK	APP	15.09.20 DATE	PROF REGISTRATION:	
	REVISIONS							



20 BAY ROAD, WARRINGTON
ACCESS & SITE

STAGE 2 PAVEMENT / REINFORCED GRASS
SHEET 1 OF 1

ATTACHMENT D

- 1) The works shall be carried out in general accordance with the resource consent application RMXXXXXX received by Council on XXX 2018 unless otherwise inconsistent with the conditions of consent, in which case these conditions shall prevail.
- 2) The landscape planting shall be undertaken in general accordance with the approved Landscape Plan. Landscaping internal to the site will be used to delineate the camping bays but may not be established exactly as shown on the site plan.
- 3) The landscape boundary planting along the northern boundary of the site shall be maintained to a minimum height of 2m and a minimum width of 1 metre to provide adequate screening of the site. Any dead plants shall be replaced to maintain this screening function.
- 4) The plantings referred to in condition (2) above shall be implemented within 12 months of the motor caravan park commencing operation, and shall be maintained (and replaced, as necessary) thereafter.
- 5) Vehicle access to the site for the purpose of NZMCA members camping at the site shall be via Bay Road only.
- 6) The vehicle access to the motor caravan park shall be formed to a width of 6m, hard surfaced from the edge of the carriageway of Bay Road to a distance not less than 5m inside the property boundary, and be adequately drained for its duration.
- 7) Gas generators shall not be used within the site between the hours of 8:00pm and 8:00am, and advice to this effect shall be included on the sign erected on site.
- 8) The use of the site for camping on a temporary basis shall be restricted to NZMCA financial members travelling in NZS 5465:2001 certified self-contained vehicles only.
- 9) The activity shall result in no greater than 8 lux of light onto any other site used for residential purposes during night-time hours, measured at the windows of any such residentially occupied building.
- 10) Prior to earthworks, a technical specification of the pavement design shall be prepared in accordance with construction considerations recommended in the Pavement Options Memo submitted with the resource consent application.
- 11) As a first principle, every practical effort should be made to avoid damage to any archaeological site, whether known, or discovered during any redevelopment of the site.
- 12) A site instruction document and contractor briefing document shall be prepared for NZMCA. Before the start of any on-site works, all contractors should be briefed by an archaeologist on the legislative requirements of working within archaeological sites.
- 13) All subsurface works should be monitored by an archaeologist. Any archaeological features or recovered material should be appropriately recorded and analysed.
- 14) Before site works commence notification should be given with at least 2 working days' notice, to HNZPT, Aukaha. An invitation should be extended for a representative from Kōti Huirapa Runaka ki Puketeraki to attend site during all earthworks.
- 15) If at any stage during the redevelopment Māori material is discovered, NZHP should be called in the first instance. NZHP will assist the NZMCA to contact all relevant parties, including HNZPT, and Aukaha. If Māori material does exist in the area to be developed, damage to this should be minimised. Any Maori artefacts will be, prima facie, property of the Crown and will be submitted to the appropriate institutions.
- 16) A full report on any archaeological material that is found should be prepared and submitted to the HNZPT within one year of the completion of archaeological site works.

Advice Note:

- 17) An archaeological authority under Section 44 of the HNZPTA 2014 should be obtained from the HNZPT prior to any modification of the site.

28 October 2020

Stantec
P O Box 13052
CHRISTCHURCH 8024

Attention: Kelly Bombay

Resource Consent – New Zealand Motor Caravan Association (NZMCA)

Application

Kāti Huirapa Rūnaka ki Puketeraki understand that the NZMCA are applying for resource consents associated with establishing and operation of a NZMCA campground – 20 Bay Road, Warrington (as specified in the information provided).

The applicant for resource consent application is as follows:
NZMCA – New Zealand Motor Caravan Association

The Affected Party

Aukaha writes this written approval on behalf of Kāti Huirapa Rūnaka ki Puketeraki, the kaitiaki Rūnanga whose takiwā (area) includes the site the application relates to.

The representatives have received the full application provided and subsequent site visit held on 26 September 2020.

This letter is specific to the above proposal and any changes to the application will require further consultation and written approval from the Rūnanga.

I have the authority to sign on behalf of the Rūnanga and I have read the full application provided.

Kāti Huirapa Rūnaka ki Puketeraki represent the rangatira and are kaitiaki of all natural resources within the area to which the application relates.

Decision

Kāti Huirapa Rūnaka ki Puketeraki **do not** provide their written approval.

Kāti Huirapa Rūnaka ki Puketeraki thanks the applicant for the opportunity to view the site and the open discussion on this proposal. However, Kāti Huirapa Rūnaka ki Puketeraki still have concerns with the proposal in its entirety.

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).

The subject site is within two Dunedin City Council Wāhi Tūpuna mapped areas. Wāhi Tūpuna areas are landscapes and places that hold particular cultural and ancestral significance for Kāi Tahu (Ngāi Tahu) and our culture and traditions with our ancestral lands, water, sites, wāhi tapu, and other taonga.

ID. 14 – Pūrākaunui to Hikaroroa to Huriawa.

The broader landscape encompassing all the above features between the Waikouaiti River, Hikaroroa and Whareakeake. Many of these sites date from a similar period and were a significant area of Māori settlement and activity up to the period of European settlement.

Values:

Pā tawhito; kāika; urupā; wāhi tohu; mauka; mahika kai; wāhi taoka; archaeological remains

Threats:

Activities that affect the visual integrity of the peaks and ridgelines, including buildings, structures, public amenities, network utilities, mining, forestry, earthworks, new roads or additions and alterations to existing roads; earthworks

ID. 15 – Okahau (Warrington)

The site of an ancient Waitaha settlement and later Māori occupation. Archaeological remains are still present. This site has linkages with Blueskin Bay

Values: Kāika; Kai moana; indigenous vegetation; wāhi taoka; mahika kai; archaeological remains

Threats: earthworks, subdivision, natural hazard mitigation activities.

Kāti Huirapa Rūnaka ki Puketeraki suggest the application be Publicly Notified to allow residents of Warrington to also have a voice.

Please see Kāi Tahu ki Otago Natural Resource Management Plan 2005 appendices seen as relevant to this application.

Kāti Huirapa Rūnaka ki Puketeraki understand that they may withdraw written approval by giving written notice to the consent authority if there is a hearing, or if not, then before the application is determined.

Nāku noa, nā



Tania Richardson
Consents Officer

cc

Kāti Huirapa Rūnaka ki Puketeraki

Appendices

The following Issues/Objectives/Policies of the Kāi Tahu ki Otago Natural Resource Management Plan 2005 are seen as relevant to the above proposal. This relates to the holistic management of natural resources from the perspective of local iwi.

Kāi Tahu ki Otago Natural Resource Management Plan 2005

Otago Region / Te Rohe o Otago

Wai Māori

Wai Māori General Issues

Discharges

- Cumulative effects of discharges.
- Discharge of human waste and other contaminants from point and non point source discharges to water
- View that due to dilution rates, discharges to water have little or no effects.

Wai Māori General Objectives

- There is no discharge of human waste directly to water.
- Contaminants being discharged directly or indirectly to water are reduced.

Wai Māori General Policies

- To protect and restore the mauri of all water.

Discharges

- To require land disposal for human effluent and contaminants.
- To require consideration of alternatives and use of new technology for discharge renewal consents.
- To require monitoring of all discharges be undertaken on a regular basis and all information, including an independent analysis of monitoring results be made available to Kāi Tahu ki Otago.
- To encourage Management Plans for all discharge activities that details the procedure for containing spills and including plans for extraordinary events.
- To require all discharge systems be well maintained and regularly serviced. Copies of all service and maintenance records should be available to Kāi Tahu ki Otago upon request.

Wāhi Tapu

Wāhi Tapu General Issues

- Contamination by discharges and other activities seriously erodes the cultural value and integrity of wāhi tapu.

Wāhi Tahu Objectives

- All wāhi tapu are protected from inappropriate activities
- Kāi Tahu ki Otago have access to wāhi tapu.
- Wāhi tapu throughout the Otago region are protected in a culturally appropriate manner.

Wāhi Tapu General Policies

- To require consultation with Kāi Tahu ki Otago for activities that have the potential to affect wāhi tapu.

Discharges

- To discourage all discharges near wāhi tapu.