
TO: Hearings Committee

FROM: Robert Buxton, Consultant Planner

DATE: 16 August 2021

SUBJECT: **RESOURCE CONSENT APPLICATION**
LUC-2020-293
20 Bay Road, Warrington
New Zealand Motor Caravan Association

INTRODUCTION

- [1] This report has been prepared on the basis of information available on 16 August 2021. The purpose of the report is to provide a framework for the Committee's consideration of the application and the Committee is not bound by any comments made within the report. The Committee is required to make a thorough assessment of the application using the statutory framework of the Resource Management Act 1991 (the Act) before reaching a decision.

SUMMARY OF RECOMMENDATION

- [2] For the reasons set out below, I consider that the proposed camping site for up to 60 self-contained vehicles or caravans will have minor adverse effects provided that the effects on the Warrington wastewater treatment system can be addressed. In terms of the applicant using the Council Reserve as an alternative vehicle access, as raised as an option in the original application and requested by some submitters, this is considered not acceptable due to Reserves Act matters regarding private use of a reserve and adverse effects of additional vehicles travelling through the reserve. I also consider that the proposal is generally consistent with the relevant objectives and policies of both District Plans. The proposal is considered to be located on a unique site that is split between residential and rural zones in an area that has a recreational character. As a result, I have concluded that the application should be granted, subject to conditions.

BACKGROUND, DESCRIPTION OF SITE AND LOCATION

- [3] The application site is comprised of relatively flat to undulating low lying sand dunes, located on the spit between Warrington Domain and Blueskin Bay.
- [4] The application site is 3.24ha, an irregular shape and is accessed by a leg-in from Bay Road, between 10 Bay Road to the west and 22 and 24 Bay Road to the east. The leg-in is approximately 17m wide, 135m long and 0.23ha and is centrally located to the bulk of the site. The bulk of the site is bordered to the east and south by a site generally known as the Warrington Domain (and includes the recently created freedom camping area), and is bordered to the west by an unformed road that forms the coastal edge of Blueskin Bay. To the east of the leg-in, the northern boundary of the bulk of the site borders a 4m wide strip of land that runs along the rear of 22, 28 and 30 Bay Road. This strip of land is owned by the Council and is attached to the Warrington Domain at the east, but finishes at the leg-in. To the west of the leg-in, the northern boundary of the bulk of the site borders the

rear of 10 Bay Road. The bulk of the site contains the Kings High School education facility, which is located in the northwest portion.

- [5] A 4 lot subdivision was granted consent by council (A93059, now referenced as RMA-1993-357867). Certification pursuant to Section 223 of the Resource Management Act was granted in May 1995 and the resulting survey was approved by Land Information New Zealand in November 1995. However, as the formation and partial sealing of the Right of Way (ROW) and piping of the watercourse was incomplete, Section 224c certification was unable to be sought and the consent lapsed.
- [6] The Kings High School education facility was granted land use consent on 10 June 1998 (RMA960388, now referenced as RMA-1996-359585). In that consent decision, the 'site' for the education facility was referred to as being 0.5793ha and accessed by a ROW, therefore, the site was Lot 1 of consent RMA93059. This site was also referred to in the application and in the notification of the application. The lapse period for RMA960388 was extended twice, first by RMA 2000-0730 and then RMA 2001-0714, to lapse on 10 November 2006.
- [7] An application, SUB-2010-78, was made for the subdivision of the subject site into nine lots, however, this application was withdrawn.
- [8] A subdivision and land use consent (SUB-2011-30 & LUC-2011-121) was granted on 5 May 2011, which provided for a two lot subdivision that separated the Residential zone portion (proposed Lot 2 SUB-2011-30) from the Rural zone portion (proposed Lot 1 SUB-2011-30) and vesting of the Rural zone portion as Local Purpose Reserve. The associated land use consent authorised the existing education facility within a 4000m2 curtilage (undefined) on proposed Lot 2 SUB-2011-30. The subdivision never proceeded, and the status of the land use consent LUC-2011-121 is uncertain, but possibly lapsed, as it was related to the lapsed subdivision.
- [9] A recent subdivision and land use consent (SUB-2018-148 & LUC-2018-555, issued 31 October 2019) was originally intended to reinstate the previous 4 lot subdivision (DCC consent number A-93059) that never proceeded beyond the s224 stage. However, following consideration of a number of matters, the applicant amended the scheme plan to a 3-lot subdivision. In this subdivision, Lot 1 of 0.5793ha will contain the existing Kings High School education facility and will be gifted to the school. Lot 1 will be accessed from Bay Road via a Right of Way (ROW) over Lot 2. Lot 2 (2.84ha) will make up the residual site including the leg-in, except for Lot 3 (315m2) which will be vested as reserve. Lot 3 will be a 4m wide strip that runs along the rear boundary of 10 Bay Road, and will be connected to the existing 4m wide strip to the east of the leg-in via a 4m wide Right of Way over the southern end of the leg-in. The application stated that the proposed strip: "will be gifted to council as reserve, to honour a long-standing agreement between the applicant and council regarding access between council's reserve and the estuary. This land was pledged in lieu of a Reserves Contribution, and its acceptance is documented in the report dated 17 May 1993".
- [10] SUB-2018-148 included the following requirement for a consent notice, which have been issued by the Council but the titles have not been issued at this point of time:
 - a. The following consent notices must be registered on the certificate of title for Lots 1 and 2:
 - i. No earthworks or development other than the removal of vegetation using hand tools shall occur on the site until:

- a) an archaeological assessment has been prepared by an appropriately qualified and experienced person; and
 - b) that any necessary approvals from Heritage New Zealand Pouhere Taonga have been obtained.
 - ii. In the event that an unidentified archaeological site is located during any works on the site, the Heritage New Zealand Pouhere Taonga Archaeological Discovery Protocol in Attachment 1 applies.
 - iii. This site shall not be subdivided or built upon without further engineering investigation of the natural hazards affecting this land. The engineering report shall identify any hazards present (including amplified movement and liquefaction, and potential inundation) and suitable mitigation measures, and shall be submitted to the Council with any building consent or resource consent application. No work is to commence on-site until Council is satisfied the hazards can be appropriately and adequately avoided, remedied or mitigated.
- [11] Section 224(c) certification was issued for subdivision SUB-2018-148 in February 2021 (Land Transfer Plan 555827) and consent notices have been issued in conjunction with the 224(c) certificate. However, Land-on-line records indicate that the plan has not been deposited to date.
- [12] The subject site is currently legally described as Part Lot 1 Deposited Plan 5855 and Lot 1 Deposited Plan 10272 (held in Record of Title OT13B/973), and is 3.2407ha.
- [13] The immediately surrounding properties consist of the following,:

Site	Area	Owner (from DCC Ratepayer info)
Adjoining Sites		
10 Bay Road	9373m ²	KJ and PM Muschamp
16 Bay Road	667m ²	KJ and PM Muschamp
22 Bay Road	2594m ²	TN and KL Price
24 Bay Road	3198m ²	QR Johnston, LM Marsh, GCA Legal Trustee 2020 Limited
Lot 2 Bay Road)Strip of land at rear of 22, 28 and 30 Bay Road	364m ²	DCC
1 Esplanade	65.4489ha	DCC
Road Reserve (to west of site	-	DCC

DESCRIPTION OF PROPOSAL

- [14] The current application proposes to establish a camping site for up to 60 self-contained vehicles or caravans. This camping site will be on the eastern half of Lot 2 of Subdivision SUB-2018-148, being 2.84ha, adjacent to the existing freedom camping site in the domain

to the east. The existing access from Bay Road will be used. The activity is proposed to be undertaken in two stages. The first stage will involve 46 parking spaces shown as light blue on the landscape plan (Appendix A of the application), 20 parking spaces will be 7m deep and 6m wide to accommodate smaller vehicles and 26 parking spaces will be 13m deep and 6m wide to accommodate larger vehicles. The second stage will involve 10 parking spaces shown as red on the landscape plan to accommodate larger vehicles and removal of 2 smaller parking spaces. Although the Landscape Plan indicates a total of 56 parking spaces, the application requests consent for up to 60 vehicles. The application states that members would be permitted to stay on a temporary basis only, not semi-permanent or permanent, and the average length of stay is 2 – 3 consecutive nights.

- [15] Access will be via the existing leg-in from Bay Road, and for the length of the leg-in the driveway will be formed to 6m width. A gate will be set back 15m from the road frontage so that vehicles can pull off Bay Road to open the gate. As further information the applicant has advised that the first 15m section will be hard surfaced and the gate will include a sign stating “NZMCA members only”. The remainder of the driveway through the leg-in would be gravelled.
- [16] Beyond the gravel driveway the site will have various “pavement” treatments, and there will be landscaping for screening. Three types of pavement are proposed: Type 1 involving stripping 50mm of turf, a layer of topsoil to level the site, followed by reinforcement mats backfilled with topsoil that would then be sown in grass; Type 2 (over the identified archaeological area) involving a layer of geofabric, 100mm of coarse sand then 200mm of topsoil sown with grass; and Type 3 involving levelling with topsoil to level the site and sown in grass. The actual volume cannot be fully determined at this time and only estimates have been provided. Also, further information provided on 5 November 2020 noted that the balance of the area will remain undisturbed and grassed, but that if the integrity of the ground is disturbed due to frequent circulation, then Pavement Type 3 or, if need be, Pavement Type 1 would be considered. Given that the proposal may require upgrades to the paving, the proposed earthworks that form part of this application must include the potential for that paving to occur, as well as that for the formation of the gravel driveway.
- [17] In response to a further information request from the Council’s Transportation Planner, the applicant has offered conditions that will require them to upgrade the eastern portion of Bay Road from the driveway to the intersection with Hill Road. This upgrade would involve constructing a gravelled/metalled shoulder on the northern side of Bay Road (between the site access and the Bay Road/Hill Road intersection). The shoulder would be generally 1.0m wide and no less than 0.8m wide, and would need to meet the Council’s engineering standards. In addition, the applicant has offered a condition requiring a safety audit to be undertaken by its transportation engineer to determine whether the intersection is operating to an appropriate level of safety/efficiency or make recommendations to the Council on the necessary improvements. The northwest corner of the Bay Road/Hill Road intersection has a large hedge and a carport beside the hedge that encroach approximately 6m onto the road reserve, and are not authorised. A condition is also offered by the applicant that its members will be encouraged to use the use the same route into Warrington as those campervans accessing the Warrington Domain, and a sign would require those leaving the site to turn right towards the Bay Road/Hill Road intersection so as to avoid the confined bend at the western end of Bay Road into Bank Road.
- [18] Structural elements will be a kiosk (no bigger than 10m²), refuse and recycling facilities, and a potable water supply. The application does not include a dump station facility, although as further information the applicant has advised they may look at adding one in

future, either connecting to the Warrington Wastewater system, or using a separate tank system that would be regularly emptied.

ACTIVITY STATUS

- [19] Dunedin currently has two district plans: the Operative Dunedin City District Plan 2006 (the “2006 District Plan”, and the Proposed Second Generation Dunedin City District Plan (the “Proposed 2GP”). Until the Proposed 2GP is made fully operative, both district plans need to be considered in determining the activity status and deciding what aspects of the activity require resource consent.
- [20] The activity status of the application is fixed by the provisions in place when the application was first lodged, pursuant to section 88A of the Resource Management Act 1991. However, it is the provisions of both district plans in force at the time of the decision that must be had regard to when assessing the application.

2006 District Plan

- [21] Under the 2006 District Plan, the definition of site “means land held in one Certificate of Title”. As titles under SUB-2018-148 have not been issued, the site under the 2006 District Plan is Part Lot 1 Deposited Plan 5855 and Lot 1 Deposited Plan 10272 (held in Record of Title OT13B/973), and is 3.2407ha. This site includes the area containing the Kings High School education facility.
- [22] The subject site is zoned partly **Residential 1** (approximately 54.5% or 1.77ha) and partly **Rural** (approximately 45.5% or 1.47ha) under the Dunedin City District Plan. The Rural zoned portion is L-shaped being approximately 60m wide from the western side boundary and 43m wide along the southern boundary, and encompasses the land within the Residential 1 zone. To the east and south of the site, the site borders the North Coast Coastal Landscape Preservation Area. The Blueskin Bay boundary, which is within the unformed road to the west of the site, is mapped as “Esplanade Reserve Required” and Area of Significant Conservation Value (ASCV) Estuarine Edge C104, which is described as “Estuary - mudflat, salt rush and reed swamp, succulent herb swamp”. Bay Road is classified as a Local Road.
- [23] Note the site is not mapped in the 2006 District Plan or included in Schedule 25.2 as an “Archaeological Site registered by the NZ Historic Places Trust”.
- [24] The application refers to advice from the DCC that the Residential zone rules of the Proposed 2GP relevant to this application are not subject to appeal, therefore the Residential zone rules of the 2006 District Plan that apply to this activity are considered effectively inoperative. In terms of the Rural zone rules of the Proposed 2GP, as these were understood to be under appeal at the time, the applicant has applied for consent in terms of the Rural zone rules. The application notes that the proposed activity does not appear to be provided under in the Rural zone, and therefore, under Rule 6.5.7 the activity is considered a **non-complying activity**. This activity status will remain, regardless of whether the appeals are resolved.
- [25] Rule 6.7 outlines matters, in addition to the matters contained in the Fourth Schedule of the RMA, that the Council will have regard to, but not be restricted to.

Proposed 2GP

- [26] The definition of site includes:

An area of land which is either:

- ...
- contained in a single allotment on an approved survey plan of subdivision for which a separate certificate of title could be issued without further consent from the DCC.
- ...”

[27] As mentioned above Subdivision SUB-2018-148 has progressed beyond the s224(c) stage and consent notices have been issued. Therefore, although the plan has not been deposited, under the Proposed 2GP the application site can be considered to be Lot 2 of SUB-2018-148 (Lot 2 LT 555827) which is 2.8418ha.

[28] The application site is zoned partly **Township and Settlement** (approximately 1.17ha or 42%) and partly **Rural – Coastal** (approximately 1.67ha or 58%). For a split zone site, the definition of site in the Proposed 2GP states:

if any site is crossed by a zone boundary under this Plan, with the exception of a boundary between two rural zones, the site is deemed to be divided into two or more sites by that zone boundary.

[29] Based on this definition, the application can be considered to span two sites: one in the **Township and Settlement** zone of approximately 1.17ha or 42% of Lot 2 of SUB-2018-148 (“the residential site”) and the other in the **Rural – Coastal** zone of approximately 1.67ha or 58% of Lot 2 of SUB-2018-148 (“the rural site”). Note that the access leg of the residential site is approximately 0.24ha, giving a net site area of approximately 0.93ha for the residential site.

[30] Both sites include the following Mapped Areas: Wahi Tupuna (ID 14 “Purakanui to Hikaroroa to Huriawa” and ID 15 “Okahau (Warrington)”; and Archaeological Site A040 “Warrington moa hunting site”.

[31] The rural site includes the following Overlays: Natural Coastal Character “Warrington to Doctors Point sand spits” (NCC) which covers all the rural site; and the Hazard 3 (coastal) overlay which covers the lower lying portion of the rural site beside the Blueskin Bay estuary. Along the coastal strip beside Blueskin Bay there is also a thin slither of Mapped Area Wahi Tupuna (ID 16 “Blueskin Bay”).

[32] Bay Road is classified as a Local Road.

CITY WIDE ACTIVITIES

[33] The proposal falls under the definition of the following city-wide activities:

Temporary activities – Construction

Earthworks activities – Large Scale

[34] The temporary activity being construction (i.e. site development) does not meet all the development standards i.e. earthworks standards, and as such it considered to be a **restricted discretionary** activity under Rule 4.5.1.3. Matters that discretion is restricted to (and assessment guidance) are covered in Rules 4.7.2.1 and 4.7.2.2 (which links to the earthworks rules).

[35] In terms of earthworks, the maximum change in finished ground level appears to be no greater than 1.5m, so Rules 8A.5.1.3.a.i and 8A.5.1.3.a.v will not be exceeded.

- [36] Under Rule 8A.5.1.4.a.iii the small-scale earthworks maximum area is 200m² for permitted activity within an NCC. The precise extent of the earthworks has not been identified. In providing some further information dated 31 March 2021, the areas of landscaping have been considered to be excluded in the definition of “earthworks”, however, the exclusion is for “earthworks associated with the maintenance of landscaping” and therefore the area of new landscaping would need to be included. Although the precise extent of the earthworks is not known it is considered that the earthworks on the rural site exceeds 200m² in area.
- [37] Under Rule 8A.5.1.5.a.i the small-scale earthworks maximum volume for the Township and Settlement zone is 30m³ per 100m² of site for permitted activity. The residential site is approximately 11,700m², giving a maximum volume for small-scale earthworks of 3510m³. The rural site is completely within the NCC, and the maximum volume is 50m³. As noted above, the precise extent of the earthworks is not known, however, it is considered that the volume of earthworks on the rural site will exceed 50m³.
- [38] Therefore, under Rule 8A.3.2.3 the earthworks are large-scale which is a **restricted discretionary** activity and the matters that discretion is restricted to are effects on: visual amenity (Rule 8A.7.2.1.a); amenity of surrounding properties (Rule 8A.7.2.1.b); the stability of land, buildings and structures (Rule 8A.7.2.1.c); natural character of the coast (Rule 8A.7.3.2) and assessment guidance is covered in Rules 8A.7.2.1 and 8A.7.3.2.
- [39] Under Rule 8A.5.2, earthworks (irrespective of being small-scale or large-scale) on a scheduled archaeological site are required to meet Rule 13.3.3, which requires an archaeological authority. At this point in time, the applicant has not obtained an archaeological authority, and therefore under Rule 13.3.3.2 the earthwork on both sites is a **non-complying** activity, and assessment guidance is listed under Rules 8A.8.2.1, 8A.8.2.2, 13.8.2.1 and 13.8.4.1.
- [40] Note that Rule 8A.5.4.1.b requires earthworks greater than 0.6m in depth to be setback from the property boundary. The application does not refer to any earthworks greater than 0.6m depth and therefore it is assumed that this rule does not apply. However, it is noted that the 10 parking spaces of Stage 2 are close to the eastern side boundary.

MANAGEMENT ZONE ACTIVITIES

Land Use

- [41] The proposal falls under the definition of visitor accommodation. Under the Proposed 2GP, activities have both a land-use activity and a development activity component.

Land Use

A) Township and Settlement Zone

- [42] Rule 15.3.3.22 lists visitor accommodation as a **restricted discretionary** activity. Under Rule 15.11.2.7 discretion is restricted to effects on: accessibility (Rule 15.11.2.1.a); the safety and efficiency of the transport network (Rule 15.11.2.1.b); effects on surrounding sites' residential amenity (Rule 15.11.2.1.c and Rule 15.11.2.7); and streetscape amenity and character (Rule 15.11.2.1.d). Assessment guidance is given in Rules 15.11.2.1 and 15.11.2.7. Note that Variation 2 adds the effects efficiency and affordability of infrastructure as a matter for discretion to Rule 15.11.2.7, but this addition does not have legal effect.

[43] Rule 15.5.2.1.i states that the minimum density for visitor accommodation is 1 residential unit per 500m² of site area. A camper/caravan is not considered to be a residential unit as the definition of residential unit refers to “Building”, the definition of which refers to “Structure” which is defined as “if movable, greater than 10m² or 2m in height and stored or placed undisturbed on a site for more than 12 months”.

[44] Rule 15.5.8.6 Minimum Car Parking requires 1 parking space per visitor accommodation unit on a campground. A visitor accommodation unit does not apply to camping sites. Rule 15.5.8.9 Minimum Vehicle Loading requires 1 loading space for more than 50 visitor accommodation units, which does not apply to camping sites.

B) Rural – Coastal Zone

[45] Rule 16.3.3.38 lists visitor accommodation within an NCC as a **discretionary** activity. Priority considerations (Note Variation 2 clarifies that these are Assessment Guidance) are given in Rules 16.11.2.1 and 16.11.2.5.

[46] Note there is no Minimum Car Parking requirement for visitor accommodation in the Rural zone.

Development

A) Township and Settlement Zone

[47] Rule 15.3.4.20 lists a new structure, visible from an adjoining public place, that is greater than 2.5m high or having a footprint of 2m² or more on a scheduled heritage site as a **restricted discretionary** activity. Rule 15.3.4.21 lists new buildings, visible from an adjoining public place, that is on a scheduled heritage site as a **restricted discretionary** activity, noting that the definition of “building” refers to buildings greater than 10m². The application states that the proposed kiosk on the residential site will not exceed 10m². Rule 15.3.4.22 lists parking, loading and access on a scheduled heritage site visible from an adjoining public place as a **restricted discretionary** activity. Discretion is restricted to the effects on heritage values (Rule 15.11.5.5) and assessment guidance is listed in Rules 13.6.2.1 and 13.6.3.1.

[48] Rule 15.3.4.22 requires that the parking, loading and access standard be met. The applicant has advised that performance standard Rules 6.6.1.4 (gradient of car parking areas), 6.6.1.5 (surfacing and marking of parking areas) and 6.6.1.6 (lighting of parking areas) will not be met. Under Rules 6.6.1.4.2, 6.6.1.5.b and 6.6.1.6.b contravening these standards is a **restricted discretionary** activity. Discretion is restricted to the effects on the safety and efficiency of the transport network (Rules 15.10.4.12 and 6.10.5.1) and assessment guidance is listed in Rules 15.10.2.1, 6.10.2.1 and 6.10.5.1.

B) Rural – Coastal Zone

[49] No structures or buildings are shown to be within the rural site.

[50] Rule 16.3.4.19 lists parking, loading and access on a scheduled heritage site visible from an adjoining public place as a **restricted discretionary** activity. Discretion is restricted to the effects on heritage values (Rule 16.10.5.9) and assessment guidance is listed in Rules 13.6.2.1 and 13.6.3.1.

[51] Rule 16.3.4.19 requires that the parking, loading and access standard be met. The applicant has advised that performance standard Rules 6.6.1.4 (gradient of car parking areas), 6.6.1.5 (surfacing and marking of parking areas) and 6.6.1.6 (lighting of parking

areas) will not be met. Under Rules 6.6.1.4.2, 6.6.1.5.b and 6.6.1.6.b contravening these standards is a **restricted discretionary** activity. Discretion is restricted to the effects on the safety and efficiency of the transport network (Rules 16.9.4.8 and 6.10.5.1) and assessment guidance is listed in Rules 16.9.2.1, 6.10.2.1 and 6.10.5.1.

Summary

- [52] Overall, the proposal is considered to be a **non-complying** activity under the Proposed 2GP. However, it is noted that this is only due to the status of the application under Rule 13.3.3.2. Were an Archaeological Authority to be obtained the activity status of the proposal under the 2GP would change to a discretionary activity.

Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ("NESCS")

- [53] The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESCS) came into effect on 1 January 2012. The National Environmental Standard applies to any piece of land on which an activity or industry described in the current edition of the Hazardous Activities and Industries List (HAIL) is being undertaken, has been undertaken or is more likely than not to have been undertaken. Activities on HAIL sites may need to comply with permitted activity conditions specified in the National Environmental Standard and/or might require resource consent.

- [54] The following was noted in the decision for SUB-2018-148:

The applicant applied for a HAIL report from the DCC (HAIL-2018-134). That report concluded "No explicit information found regarding HAIL activity". The applicant also states that a search of the Otago Regional Council Contaminated Land database has been undertaken and have advised that the subject property "does not currently appear on the database". The applicant makes the following conclusion:

Whilst none of the information sources that we've used, provide absolute evidence that no contamination exists on any part of the site; when all the results from the various information sources are taken in their totality, the likelihood of contamination at a level that would raise concern seems extremely remote. It seems unlikely that anything present on the site, resulting from past activities, will create issues that require mitigation as part of the Resource Management process that is under way. In the event of a "discovery" of evidence to the contrary during our involvement in the development process, we would undertake to bring the new information to the applicants and Council's attention and develop the appropriate mitigation response.

In conclusion, we have reviewed retrievable information from a number of sources and have found no evidence of activities or industries on the site that would potentially have led to contamination of the site.

I have checked the HAIL report which includes historic aerial photography that shows the site does not appear to have ever been developed. Taking the applicant's advice and the HAIL report into account, it is considered that the NESCS is not applicable to this site.

- [55] The above assessment is considered to apply to this current application as no new information has been identified for the site in relation to HAIL activities.

[56] There are no other National Environmental Standards relevant to this application.

Overall Status

[57] Where an activity requires resource consent under more than one rule, and the effects of the activity are inextricably linked, the general principle from case law is that the different components should be bundled and the most restrictive activity classification applied to the whole proposal.

[58] In this case, there is more than one rule involved, and the effects are linked. As a result, having regard to the most restrictive activity classification under both district plans, the proposal is considered to be a **non-complying** activity.

NOTIFICATION AND SUBMISSIONS

[59] The application was limited notified to all those parties the Council considered affected by the proposal, being the immediate adjacent properties to the driveway, Kings High School, Heritage New Zealand Pouhere Taonga and Manawhenua (via Aukaha), on 2 June 2021.

[60] Submissions closed on 5 July 2021. Five submissions were received by the close of the submission period, with four opposing and one supporting.

[61] The submissions are summarised in the table below, and a full copy of the submissions is attached in Appendix 2.

Name of Submitter	Address	Support/ Oppose	Summary of Submission	Wish to be heard?	Delegate to commissioners
Trevor and Terry Price		Oppose	Concerned about: Noise, privacy and visual impact House is on a higher level so they will see motor homes and caravans. Can hear people and vehicles on domain and proposal will be closer, so noise will be unreasonable. Request reduced number of motor caravan parks and use and upgrade existing access.	No, but would present a joint case with others.	No
Richard Hatherly	Owner of 20 Bay Street	Support	On purchasing the site commissioned an archaeological assessments to ensure historical integrity of site. Site was levelled against his instructions destroying a pre-European occupation site and compromising a pre1900-European tip site. A further archaeological assessment advised the sand protected these site from further damage, including vehicles driving over the sites. Abandoned plans to development of site and considered offer from applicant to buy site, as he considered their use would have least development effect. Provided opportunity for applicant to trial the site and considered there were no detrimental effects from the trial. Has been involved in protecting the site and surrounding for over 50years, and considers the applicant has demonstrated the care necessary to protect this taonga. Requests application be granted.	Yes, and would present a joint case with others.	No

Kevin Jack, Prudence Moira, Jye and Jessica Muschamp		Oppose	Considers the applicant's land should only be used for residential development. Considers existing freedom camp sufficient, and proposal will be over-development. Concerned about: Noise, light, dust and toxic fumes; Impact of users on estuary coastline; Impact of traffic on residents, neighbours and themselves; Additional pressure on wastewater treatment plant causing contamination of coast and estuary; No positive effects. Requests application be declined. Issues interested in are: Number of vehicles; Traffic, specifically options for access; Environmental factors and vegetation; and Waste disposal. If NZMCA pursue application then the wider Warrington residents are included and involved in future decision -making.	Yes, and would present a joint case with others.	Not specified
Quenton Johnston and Louise Marsh	24 Bay Road	Oppose	Concerned about: Noise, light pollution, emissions and dust from vehicles; Transport safety on Bay Road for pedestrians, dogs and horses. The proposed improvements to Bay Road would be confusing. NZMCA vehicles would need to travel to domain to use dumping station, and rubbish collection day would reduce space and safety; Residential coherence from increased transient population, additional demand on wastewater system, noise from campers and their generators, increased fire risk, impact of additional people and dogs on wildlife; and Cumulative effects. No need for camping additional to freedom camping site. Request application be declined, but if Council grants it, they request access be the existing access from the Domain, or proposed access is sealed, and overall numbers of camper parks be reduced.	Yes	Not specified
Aukaha on behalf of Kāti Huirapa Rūnaka ki Puketeraki		Oppose	Application site is of high cultural value and historical significance as proven by the archaeological site, which includes a traditional travel route. The proposal has potential to disturb and damage the site. The proposal will add further pressure on the wastewater treatment plant, affecting the mauri of the inlet and sea. Request application be declined.	No	No

[62] The owner of the site was not included in the list of affected parties, and it may be considered that the submission cannot be accepted as a submission. However, the applicant may wish to adopt it as part of their application.

ENVIRONMENTAL EFFECTS OF ALLOWING THE ACTIVITY

[63] Section 104(1)(a) of the Act requires that the Council have regard to any actual and potential effects on the environment of allowing the activity. 'Effect' is defined in Section 3 of the Act as including-

- a) *Any positive or adverse effect; and*
- b) *Any temporary or permanent effect; and*
- c) *Any past, present, or future effect; and*
- d) *Any cumulative effect which arises over time or in combination with other effects—
regardless of the scale, intensity, duration or frequency of the effect, and also includes –*
- e) *Any potential effect of high probability; and*
- f) *Any potential effect of low probability which has a high potential impact.*

Permitted Baseline

[64] An important consideration for the assessment of effects is the application of what is commonly referred to as the permitted baseline assessment. The purpose of the permitted baseline assessment is to identify the non-fanciful effects of permitted activities and those effects authorised by resource consent in order to quantify the degree of effect of the proposed activity. Effects within the permitted baseline can be disregarded in the effects assessment of the activity.

[65] If an archaeological authority has not been obtained there is no permitted baseline for work that may involve earthworks. Permitted activities that may not involve earthworks may include Farming, Conservation; and Grazing.

[66] On the assumption that an archaeological authority can be obtained for any earthworks, then the maximum permitted earthworks on the residential site will be 3510m³. However, under Rule 15.3.4.20, any structure associated with a permitted land use and visible from a public place would need to be no greater than 2.5m high or have a footprint of no more than 2m², and any new building associated with a permitted land use and visible from a public place would need to have a footprint of no more than 10m² and the land use could not have any requirement for access or car parking (Rule 15.3.4.22). Activities that could meet these requirements would include: Conservation; and Grazing.

[67] For the rural site of 1.67ha, on the assumption that an archaeological authority can be obtained, then the maximum permitted earthworks will be less than 200m² in area and 50m³ in volume. However, under Rule 16.3.4.16, any structure associated with a permitted land use and visible from a public place would need to be no greater than 2.5m high or have a footprint of no more than 2m², and any new building associated with a permitted land use and visible from a public place would need to have a footprint of no more than 10m², and the land use could not have any requirement for access or car parking (Rule 16.3.4.19). Activities that could meet these requirements would include: Farming; Grazing; Conservation; Mineral Prospecting; and Mineral exploration that does not involve blasting.

[68] It is considered that this is the appropriate baseline if an archaeological authority can be obtained.

[69] The existing and reasonably foreseeable receiving environment is made up of:

- The existing environment and associated effects from lawfully established activities;
- Effects from any consents on the subject site (not impacted by proposal) that are likely to be implemented;
- The existing environment as modified by any resource consents granted and likely to be implemented; and
- The environment as likely to be modified by activities permitted in the district plan.

[70] For the subject site, the existing and reasonably foreseeable receiving environment comprises coastal grassland.

[71] For adjacent land, the existing and reasonably foreseeable receiving environment comprises: public reserve to the east, south and west (with a freedom camping area, playground and surf lifesaving club to the east), the Kings High School education facility immediately to the north and, beyond that, residential development consisting of single residential units.

[72] It is against these that the effects of the activity, beyond the permitted baseline, must be measured.

Assessment of Effects

[73] The following parts of this report represent my views on the effects of the proposal, having regard to the application, the submissions, and my visit to the site. Comments by Council's Officers are contained in Appendix 3.

Landscape, Amenity and Visual Effects

[74] The application was initially considered by the Council's Consultant Landscape Architect and, since close of submission was considered by the Council's Inhouse Landscape Architect due to the retirement of the Consultant Landscape Architect. The Consultant Landscape Architect noted the following key points:

- *The site is well recognised for its recreational pursuits, situated at the landward end of a peninsula extending between Blueskin Bay and the Pacific Ocean. There is a DCC recreational reserve with toilets and playground facilities to the east, and there are a number of surrounding bike and walking trails.*
- *There is considerable existing natural character on the site, with a mixture of exotic and native vegetation, with sand dunes to the west and east. The site is mainly surfaced in pasture grass, supplemented by ngaio, bracken and gorse. Taller vegetation, predominantly pines, provide an existing perimeter screen function for the majority of the site.*

[75] The Consultant Landscape Architect made the following comments:

There is no doubt that this site occupies a pivotal part of an important natural character zone at Warrington. It is located between the residential areas on more elevated land to the north; the peninsula which has a predominantly natural character; and Blueskin Bay which provides a natural and visual focus for the surrounding area. A newly established activity here would be potentially very visible, if it were not for the moderating effect of existing vegetation. The application provides a good concept of proposed landscape treatment, including preserving and enhancing existing screen vegetation, and allowing for appropriate new planting.

In my opinion the natural and amenity character of the site will be changed to some extent with the introduction of a considerable number of caravans and associated supporting installations. However, with the introduction of sensitive site treatment to preserve and enhance existing vegetation screening, I consider that any adverse landscape, amenity and visual effects will be no more than minor.

To ensure that the intentions outlined in the Landscape Plan included as Appendix A in the application are implemented and there is use of the recommended planting species in point 3.3.3 of the application, I recommend the inclusion of the following (or similar) condition, should consent be granted:

As part of the development, the concepts outlined in the Landscape Plan included in the application as Appendix A shall be fully implemented. Additional detailed planting designs shall be provided prior to major work commencing. These shall indicate which tall exotic trees will be retained as noted in the original plan, and which native planting, using species outlined in section 3.3.3 of the application, will be used. New planting shall be completed within one year of major site works commencing.

- [76] The Inhouse Landscape Architect agrees with that initial assessment that both existing vegetation and proposed planting will be important to mitigate potential adverse visual amenity and natural character effects associated with the proposed development. He notes that the effects of up to 60 motor homes will differ from potential residential development on the site, due to the predominantly white colour of the campervans, the coming and going of the vehicles and the camping activity around the vehicles. To address this, landscaping will be important, and the Inhouse Landscape Architect notes that there is good buffer along the southern and eastern sides, but mitigation planting will be required along the accessway, along the northern boundary of the property, west of the southern-most parking rows and internal to the site to mitigate potential adverse effects on the visual amenity of surrounding residential sites and nearby walkway users. In terms of visual effects on the owners of the properties adjoining the accessway, the Inhouse Landscape Architect notes that there is sufficient width of the leg-in to provide screen planting which once established will keep visual impact to a low level.
- [77] I agree that overall the development will have no more than minor adverse effects on landscape, amenity and visual effects. The proposal will retain much of the open space currently on-site, and the presence of campervans amongst screening vegetation will be in keeping with the adjoining recreational uses of the area, as noted by the Consultant Landscape Architect “*well recognised for its recreational pursuits*”. Although there is no permitted baseline, it is also noted a significant portion of the site is zoned residential, which provides for permanent structures into an area of Warrington that has a more open character.
- [78] As noted by the Inhouse Landscape Architect, mitigation screening planting will be required to screen the camping site as well as the driveway. To ensure that the planting is properly established, a thorough landscaping plan will be required, including good ground preparation in order for the vegetation to establish and thrive. To some extent this is counter to protecting the remaining archaeological material, and therefore a suitably qualified archaeologist should supervise the ground preparation. The landscaping plan will also need to identify the existing established vegetation to be retain and use of locally appropriate coastal planting, as well as the ongoing maintenance of all landscape planting.
- [79] The Inhouse Landscape Architect notes the concern of the Council’s Biodiversity Officer regarding increased usage of the area and its effect on the nearby saltmarsh turf, and the use of landscaping to protect the natural character of the estuary edge and amenity for

users of the walkway in that area. To address this, I consider the existing direct access from the site to the estuary edge should be planted and fenced, so that users of the site would walk out of the existing access at the southeastern corner of the site (noting that this access will not be available to vehicles). The users of the site will then join a well-established road that gives them options to access either the beach or estuary using the same tracks as other users of the area. This would also address the concerns of the Council's Parks and Recreation Planner about access between a private site and the surrounding reserve.

Biodiversity

[80] The application was forwarded to Council's Biodiversity Officer for comment. The Biodiversity Officer concluded that:

- *The effects on indigenous biodiversity values on the property from the proposal are negligible provided existing ngaio trees are avoided [i.e. they are retained];*
- *The proposed native plantings will improve biodiversity values at the site provided they are comprised of plant species indigenous to the Dunedin Ecological District that are ecologically appropriate for sand dune ecosystems; and*
- *Potential significant adverse effects on indigenous biodiversity in the adjacent area of indigenous saltmarsh vegetation can be anticipated and should be avoided.*

[81] I concur with the Biodiversity Officer, and note that the concern regarding the adjacent area of indigenous saltmarsh vegetation relates to a likely significant increase in the usage of the site and resulting foot traffic down to the estuary. As noted above, I consider this can be managed through conditions that discourages direct access to the estuary and that the consent holder provide information to the campers to avoid damaging the area of indigenous saltmarsh vegetation.

[82] I note that the proposal will potentially improve biodiversity on the site, although preparation of the ground for any planted areas will need to be carefully undertaken so as not to disturb any archaeological features.

Archaeology

[83] The site is identified as an archaeological site, and an Archaeological Authority is required from Heritage New Zealand Pouhere Taonga (HNZPT). The applicant has provided an Archaeological Assessment by New Zealand Heritage Properties (NZHP) that assessed the effects of the proposed development for its effects on previously recorded archaeological sites I44/177 and I44/178, and NZHP recommended consent conditions which have been adopted by the applicant.

[84] A conclusion from the site survey by NZHP states:

From the findings of the site survey, it is clear that sub-surface archaeology is still present across the site in varying forms with some surface archaeology occurring where erosion is taking place. As this archaeology is likely to be impacted by the proposed development, NZHP recommends that standover monitoring by an archaeologist takes place during all earthworks in the project area as there is the potential for the previously recorded archaeological sites to extend further than is currently recorded. Furthermore, NZHP recommends post-excavation analysis

of any artefactual finds, as well as reporting as per standard archaeological practice.

[85] The application has been considered by Council's Consultant Archaeologist whose summary states:

- *Warrington moa hunting site (A040) is a complex of scattered deposits of archaeological material that dates back to the earliest period of human settlement in New Zealand.*
- *There have been numerous previous excavations that have encountered archaeological material in the vicinity of 20 Bay Road.*
- *There have been numerous previous instances of land modification and site damage, though the specific effects of this damage on archaeological material is unclear.*
- *Earthworks between 50-250mm deep are proposed in localised areas across the property.*
- *There is the potential for these earthworks to encounter archaeological material, but the actual effect of excavation is unknown.*
- *The applicant has proposed a good mitigation strategy to avoid/minimise the impact/potential impact of excavation on archaeological material.*
- *An Archaeological Authority is required for the proposed work. HNZPT have not yet received an Authority application.*

Ultimately, despite the mitigation strategy, the full impact of the proposed earthworks is still unclear. Accordingly, the approval of this application should be conditional on the applicant securing an Archaeological Authority for the work.

[86] I note that the Consultant Archaeologist advises that the NZHP survey did not exclude the possibility of additional material elsewhere at the property, hence the statement that the full impact is unclear. This is the primary concern, both at the time that earthworks are undertaken and also during the use of the site if the surface for access and parking areas is damaged. Children of campers could also disturb the site if playing in the sand dunes areas. I also note that for adequate establishment of vegetation (as suggested by the Inhouse Landscape Architect) the ground preparation will need to be to a reasonable depth to ensure a suitable growing medium. I consider that these concerns can be addressed through conditions that require the presence of an archaeologist during any earthworks, and through monitoring of the pavement options for access and parking, as well as addressing any future disturbance to the ground.

[87] I also consider that the proposed activity is one that can have little impact on the site, compared to any land use involving permanent occupation of the site, as no substantial foundations or excavation are proposed.

Transportation

[88] The application was forwarded to Council's Transportation Operations Department for comment. The Transportation Planner raised concerns particularly about the safety and efficiency of the Hill Road/Bay Road intersection (to the east of the site entrance), the limited width and future maintenance of the surface (particularly the edge between seal and compacted shoulder) of Bay Road from the Hill Road/Bay Road intersection to the site access, and the narrowness of the bend at the Bay Road/Bank Road (to the west of the site entrance). Following discussion over further information requirements, the applicant provided conditions regarding these matters (as noted earlier). The Transportation Operations Department is satisfied that the issues associated with the Hill Road/Bay

Road intersection, and the width and surface of Bay Road can be managed by the conditions offered by the applicant. It should be noted that the Transportation Operations Department accepts that the unauthorised encroachment of the hedge and carport on the Hill Road/Bay Road intersection is an existing situation that will require the Council to address rather than requiring works to be undertaken by the applicant. However, the conditions offered by the applicant will require the applicant to undertake an audit to confirm the assessment of the suitability of the intersection and width of Bay Road by the applicant's traffic engineer.

- [89] I concur that any adverse effects of campervans on Bay Road between the applicant's site and Hill Road can be managed so that they will be less than minor. Although the seal width of Bay Road is considered insufficient for two-way movement of large vehicles, I note that the applicant's traffic engineer considers that there is very low likelihood of two large vehicles meeting on Bay Road (partly due to the tidal nature of generated traffic from the proposal, whereby generally departures from the site will occur in the morning and arrivals will occur in the afternoon), and the additional shoulder on the northern side will provide room for safe passing should they meet. The applicant's traffic engineer estimates that the proposal will increase traffic on Bay Road by up to 20% at peak usage, which they consider may be noticeable to residents, but will not generate any adverse effects on the roading network. I also note that campervans can be expected to occur on the local roads of Warrington, so will not be unusual or unexpected on Bay Road.
- [90] In terms of ensuring that vehicles arriving and leaving the site avoid the bend at the Bay Road/Bank Road (to the west of the site entrance), information provided to campers about the campsite should alert users to the requirement to follow the existing route through Warrington and a sign at the exit to the site is recommended to alert users to turn right.
- [91] Regarding the request by some submitters that the applicant use the Council Reserve as an alternative vehicle access, this matter has been considered by the Council's Parks and Recreation Planner, who has advised that the use of the reserve for access to a private property would place additional pressure on the reserve. There would also be legal matters to address, including the private use of a public reserve. While the use of the road through the reserve appears a logical option, I agree that the additional traffic within the reserve, as well as the general principle that public reserves should not be used for private use, means that this option is not supported. During a site visit I noted that the vehicle track beyond the freedom camping area is used primarily by walkers, and therefore additional traffic on this section of the track, particularly large vehicles, would create conflicts.

Infrastructure

- [92] The application was forwarded to the Council's 3-Waters Policy Analyst. They advised that there are water and wastewater services in Bay Road, and that there is a 200mm diameter wastewater pipe that runs through the access road and then from North to South-East close to the boundary line between the recently consented Lots 1 and 2. The primary concern is that there are no works undertaken near the pipe through the property that could damage the pipe. SUB-2018-148 addresses this matter by requiring an easement in gross to protect the pipe.
- [93] In the consultation with Manawhenua by the applicant, and reinforced by submissions, there is concern about any additional demands placed on the Warrington wastewater treatment plant, either through the use of the existing dump station at the freedom camping site by the applicants members, or the installation of a dump site on the applicant's site. In discussions with the Council's 3 Waters team prior to notification, the

applicant was advised that there did not seem to be any obvious technical issues with utilizing the existing pump station or with the capacity of treatment plant. Following close of submission, the Council's 3 Waters has advised that there is a capacity issue, and that they will need to work with the applicant on an alternative solution. The applicant, in its further information, has identified that it may be able to install a tank that would be regularly pumped out and the contents removed to a system that has capacity, similar to a system they have installed in Christchurch. The applicant will need to advise how this concern will be addressed.

- [94] The applicant had advised that they do not wish to undertake work that may in the future be not required if the wastewater treatment plant was upgraded. I consider that, subject to discussions with 3 Waters, that no matter what option is determined, the users of the site should be discouraged from using the public dump station at Warrington and encouraged to empty their tanks prior to arriving at Warrington, or at another facility when they leave.

Noise and glare

- [95] Council's Environmental Health Officer considered the proposal and provided comments prior to limited notification. The Environmental Health Officer has also considered the submissions received and confirmed that they consider their original comments do not need to be added to.
- [96] The Environmental Health Officer advised that the proposal is not too dissimilar to the freedom camping that already occurs on the Warrington Reserve, and notes that there have not been any noise complaints received from that activity. The Officer also considers that increased traffic to the site and potential noise from vehicles is unlikely to cause noise issues such as disrupting sleep to any nearby residential dwellings or cause additional impact on the current receiving environment. However, they recommend a condition that vehicles are not to arrive on-site in the 'night time period' as per Proposed 2GP (10pm – 7am) to minimise potential for sleep disturbance due to vehicle noise. The Officer also suggests vehicles be encouraged to not arrive/depart on-site during the evening shoulder period between 7pm – 10pm. The Environmental Health Officer supports the condition offered by the applicant that gas generators must not be used between 8pm and 8am. They also recommend that if consent is granted, a dump station be installed.
- [97] Regarding the arrival or departure of some vehicles late at night or early morning, I agree that access to and from the site should not occur during the 'night time period' to address any potential sleep disturbance. As noted by the Landscape Architect, there may be some distraction for adjoining owners from the movement of vehicles on the driveway, and this can be addressed through appropriate screening of the accessway. Glare from vehicles using the driveway will not be directly into the adjoining properties, and within the site, the landscape screening will assist in reducing glare from headlights. There may be some potential for vehicle lights to be directed towards the dwellings at 22 and 28 Bay Road, although this would generally be when the vehicles leave, which is not likely to be at night.
- [98] Regarding the dump station, the applicant was proposing to not install one at this stage, and advised they would apply to Environmental Health for a dispensation from Health Regulations if resource consent is granted. However, given the concerns regarding the use of the existing public dump station capacity of the Warrington Wastewater treatment station, alternatives will need to be considered as noted above.
- [99] Overall, I consider that with the recommended conditions, any adverse effects associated with noise and glare are likely to result from the proposed activity that will be no more than minor.

Hazards

[100] The site is annotated in the Hazards Register as:

- *Hazard ID 10111 : Intensified Shaking (Possible Earthquake Amplification)*
- *Hazard ID 11407 : Liquefaction (Domain C)*
The ground is predominantly underlain by poorly consolidated marine or estuarine sediments with a shallow groundwater table. There is considered to be a moderate to high likelihood of liquefaction-susceptible materials being present in some parts of the areas classified as Domain C.
- *Hazard ID 11394 : Coastal Inundation – Projected Sea Level Rise.*

[101] The 2GP Maps include Hazard 3 (coastal) overlay which covers the lower lying portion of the rural site beside the Blueskin Bay estuary. The proposed camping site will be away from this overlay. Given that the proposal will not involve any significant building (and the proposal has little implication for liquefaction), and is located near to and in what appears to be slightly higher land than the freedom camping site, it is considered that there are no significant risks from natural hazards.

Manawhenua

[102] The site has obvious interest to Manawhenua as noted in the report by NZHP, and Manawhenua have submitted in opposition to the application. While they are opposed to the application in its entirety, I consider the proposed activity is one that is generally suitable for such an important site as no substantial foundations or excavation is proposed. Effects on the additional demand of activity on the estuary is addressed above in terms of restricting direct access from the site to the estuary, and the proposed conditions on landscaping will reduce the visual impact. The Manawhenua's concern about the effects on the wastewater treatment plant has been confirmed by the Council's 3 Waters team, and the applicant will need to address those concerns.

Cumulative Effects

[103] The proposal will create a cumulative effect, as it will increase the amount of camping within the immediate area, and therefore the number of users on the surrounding reserves, estuary and beach. It is noted that the Proposed 2GP definition of Campground "excludes freedom camping which is managed through a DCC by-law". The number of users of the site will be limited to a maximum of 60 vehicles and the number of vehicles using the freedom camping site can be controlled by the Council. Overall the area for the freedom camping and proposed campsite is considered to be in a location having a recreational character (as noted by the Council's Consultant Landscape Architect) and provided effects on the sensitive saltmarsh are managed, additional screening planting is provided, and the capacity of the Wastewater treatment Plant is not further compromised, any cumulative effects are considered to be no more than minor.

Positive Effects

[104] The proposal will introduce additional planting on to the site, and will retain the general undeveloped character of the site in terms of lack of permanent buildings. The applicant may wish to consider undertaking additional planting beyond screen planting to enhance the biodiversity of the area. The applicant is proposing to undertake as little disturbance of the archaeological site as possible, and any disturbance can be supervised by a suitably qualified archaeologist.

Effects Assessment Conclusion

- [105] Overall I consider that any adverse effects of the proposed campsite will be no more than minor.

OFFSETTING OR COMPENSATION MEASURES ASSESSMENT

- [106] Section 104(1)(ab) of the Resource Management Act 1991 requires that the Council have regard to any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity.
- [107] In this case, no offsetting or compensation measures have been proposed or agreed to by the applicant.

OBJECTIVES AND POLICIES ASSESSMENT

Assessment of Objectives and Policies of the District Plan (Section 104(1)(b)(vi))

- [108] In accordance with Section 104(1)(b) of the Resource Management Act 1991, the objectives and policies of the 2006 District Plan and the Proposed 2GP were taken into account in assessing the application.

2006 District Plan

- [109] Although many of the objectives and policies of the 2006 District Plan may be deemed inoperative, as there are appeals against some of the Objectives and Policies of the Rural zone of the Proposed 2GP, the following Rural zone provisions have been considered as a conservative approach. It is noted that the 2006 District Plan did not map any of the site within a landscape protection area, and did not include any mapped archaeological sites.

Rural

	<u>Objective/Policy</u>	<i>Is the proposal Consistent or Inconsistent with the Objectives and Policies?</i>
Objective 6.2.1	Maintain the ability of the land resource to meet the needs of future generations.	The site is not considered to be productive land, and is not located in an area where farm production occurs. I consider the proposal is therefore not inconsistent with the objective and policies.
Policy 6.3.1	Provide for activities based on the productive use of rural land.	
Policy 6.3.2	Sustain the productive capacity of the Rural zone by controlling the adverse effects of activities.	
Policy 6.3.3	To discourage land fragmentation and the establishment of non-productive uses of rural land and to avoid potential conflict between incompatible and sensitive land uses by limiting the density of residential development in the Rural zone.	While the proposal may not enhance amenity values, it will retain the spaciousness and separation of activities in the immediate area,
Objective 6.2.2	Maintain and enhance the amenity values associated with the character of the rural area.	

Policy 6.3.5	Require rural subdivision and activities to be of a nature, scale, intensity and location consistent with maintaining the character of the rural area and to be undertaken in a manner that avoids, remedies or mitigates adverse effects on rural character. Elements of the rural character of the district include, but are not limited to: a) a predominance of natural features over human made features; b) high ratio of open space relative to the built environment; c) significant areas of vegetation in pasture, crops, forestry and indigenous vegetation; d) presence of large numbers of farmed animals; e) noises, smells and effects associated with the use of rural land for a wide range of agricultural, horticultural and forestry purposes, f) Low population densities relative to urban areas; g) Generally unsealed roads; h) Absence of urban infrastructure.	recognising that the area is not typical for the rural zone. The proposal is considered to be generally consistent with these objectives and policies.
Policy 6.3.6	Avoid, remedy or mitigate the adverse effects of buildings, structures and vegetation on the amenity of adjoining properties.	
Policy 6.3.11	Provide for the establishment of activities that are appropriate in the Rural Zone if their adverse effects can be avoided, remedied or mitigated.	
Objective 6.2.5	Avoid or minimise conflict between different land use activities in rural areas.	The site is not considered to be productive land, and is not located in an area where farm production occurs.
Policy 6.3.12	Avoid or minimise conflict between differing land uses which may adversely affect rural amenity, the ability of rural land to be used for productive purposes, or the viability of productive rural activities.	I consider the proposal is therefore not inconsistent with these objectives and policies.
Objective 6.2.6	Maintain and enhance the life-supporting capacity of land and water resources.	
Policy 6.3.14	Subdivision or land use activities should not occur where this may result in cumulative adverse effects in relation to: (a) amenity values. (b) rural character (c) natural hazards, (d) the provision of infrastructure, roading, traffic and safety, or (e) Irrespective of the ability of a site to mitigate adverse effects on the immediately surrounding environment	The cumulative effects have been considered above. I consider the proposal is therefore not inconsistent with this policy.

Proposed 2GP

The following Proposed Plan objectives and policies are considered relevant to the proposal (noting that the shaded objective or policy indicates that it is subject to appeal). Note the Natural Hazards section is not included as the camping sites are not within the mapped Hazard overlay:

Transportation

	<u>Objective/Policy</u>	<i>Is the proposal Consistent with or Inconsistent with the Objective?</i>
<u>Objective 6.2.3</u>	Land use, development and subdivision activities maintain the safety and efficiency of the transport network for all travel methods.	The applicant has discussed the use of Bay Road with the Transport Department and agreed to upgrade the formation of Bay Road to address the potential of two large vehicles meeting on the road. Regarding the Intersection of Bay Road and Hill Road, this was considered to be an existing issue which the applicant will audit, but any remediation would be a matter for the Council. I consider the proposal is consistent with these objectives and policies.
<u>Policy 6.2.3.9</u>	Only allow land use and development activities or subdivision activities that may lead to land use or development activities, where: a. adverse effects on the safety and efficiency of the transport network will be avoided or, if avoidance is not practicable, adequately mitigated; and b. any associated changes to the transportation network will be affordable to the public in the long term	

Earthworks

	<u>Objective/Policy</u>	<i>Is the proposal Consistent with or Inconsistent with the Objective?</i>
<u>Objective 8a.2.1</u>	Earthworks necessary for permitted or approved land use and development are enabled, while avoiding, or adequately mitigating, any adverse effects on: a. visual amenity and character; b. the stability of land, buildings, and structures; and c. surrounding properties.	The earthworks will be at a low level. The primary concern of the earthworks is on the archaeological values and adverse effects on these values are to be managed. I consider the proposal is consistent with this objective and policies.
<u>Policy 8A.2.1.3</u>	Only allow earthworks that exceed the scale thresholds (earthworks - large scale) and any associated retaining structures, where the following effects will be avoided or, if avoidance is not practicable, adequately mitigated: a. adverse effects on visual amenity and character; b. adverse effects on the amenity of surrounding properties, including from changes to drainage patterns; and c. adverse effects on the stability of land, buildings, and structures.	

Public Health and Safety

	<u>Objective/Policy</u>	<i>Is the proposal Consistent with or Inconsistent with the Objective?</i>
<u>Objective 9.2.1</u>	Land use, development and subdivision activities maintain or enhance the efficiency and affordability of public water supply, wastewater and stormwater infrastructure.	This matter has been discussed above. Unless appropriate solutions are provided to ensure adverse effects on the existing wastewater treatment system are addressed, I consider the proposal is inconsistent with this objective and policy.
<u>Policy 9.2.1.1</u>	Only allow land use or subdivision activities that may result in land use or development activities where: a. in an area with public water supply and/or wastewater infrastructure, it will not exceed the current or planned capacity of that infrastructure or compromise its ability to service any activities permitted within the zone; and b. ...	
<u>Policy 9.2.1.1A (Var 2)</u>	Only allow land use or subdivision activities that may result in land use or development activities in a wastewater serviced area where: a. it will not exceed the current or planned capacity of that infrastructure	

	at the time of development or compromise its ability to service any permitted activities; or b. ...	
Objective 9.2.2	Land use, development and subdivision activities maintain or enhance people's health and safety.	Council's Environmental Health Officer has advised they have no concerns over the granting of this consent from a noise point of view, provided generators are limited in the hours they are used. In terms of glare, the lights of the vehicles using the driveway will not be facing directly into the neighbouring properties, and as noted by the Inhouse Landscape Architect, screen planting will assist in reducing any light spill from headlights. There may be some potential for vehicle lights to be directed towards the dwellings at 22 and 28 Bay Road, although this would generally be when the vehicles leave, which is not likely to be at night. I consider the proposal is consistent with this objective and policy.
Policy 9.2.2.1	Require activities to be designed and operated to avoid adverse effects from noise on the health of people or, where avoidance is not practicable, ensure any adverse effects would be insignificant.	
Policy 9.2.2.4	Require activities to be designed and operated to avoid adverse effects from light spill on the health of people or, where avoidance is not practicable, ensure any adverse effects would be insignificant.	

Natural Environment

	<u>Objective/Policy</u>	<i>Is the proposal Consistent with or Inconsistent with the Objective?</i>
Objective 10.2.1	Biodiversity values are maintained or enhanced, including by protecting areas of significant indigenous vegetation and the significant habitats of indigenous fauna.	As noted by the Council's Biodiversity Officer, planting within the site can enhance biodiversity. There is potential for the sensitive indigenous salt marsh vegetation to be affected, although this can be managed through strategic plantings, pathways and possibly fencing to direct camp users from the salt marsh, and by providing signs and information to members about the site. I consider the proposal can be consistent with these objectives and policies.
Policy 10.2.1.1	Only allow land use, development and city-wide activities where biodiversity values are maintained or enhanced.	
Policy 10.2.1.5	Encourage conservation activity in all zones.	
Objective 10.2.2	The biodiversity values and natural character of the coast and riparian margins are maintained and enhanced.	
Policy 10.2.2.1	Encourage conservation activity in coastal and riparian margins.	
Policy 10.2.2.6	Only allow activities adjacent to water bodies and the coast where the biodiversity values and natural character of the coast and riparian margins are maintained or enhanced.	
Objective 10.2.3	Areas of outstanding natural coastal character (ONCC), high natural coastal character (HNCC), and natural coastal character (NCC) are protected from inappropriate use and development; and their values, as identified in Appendix A5, are preserved or enhanced.	As noted by the Council's Inhouse Landscape Architect, planting within the site can enhance the natural character. I consider the proposal can be consistent with this objective and policy.
Policy 10.2.3.5	Only allow mining, landfills, crematoriums, large buildings and structures, forestry, earthworks-large scale and indigenous vegetation clearance-large scale in the Natural Coastal Character Overlay Zone (NCC) where adverse effects on the natural character values identified in Appendix A5 will be avoided or, if avoidance is not practicable, no more than minor.	
Policy 10.2.3.9	Require buildings and structures in a Natural Coastal Character Overlay Zone (NCC) to have exterior colours and materials that avoid or minimise, as far as	The proposed kiosk will be small, but can be required to have appropriate colours. As noted by the Inhouse Landscape Architect, the campervans are generally white. This cannot be

	practicable, adverse visual effects caused by reflectivity	controlled; however, the effect can be mitigated through screening planting.
Policy 10.2.3.10	Provide for small buildings (no larger than 60m ²) in the Natural Coastal Character Overlay Zone (NCC) but limit the number of these clustered together with each other or existing large buildings to a level that avoids or, if avoidance is not practicable, ensures cumulative visual effects are no more than minor.	I consider the proposal can be consistent with these policies.
Policy 10.2.3.11	Require ancillary signs in coastal character overlay zones to be located and designed so that any adverse effects on natural character values, as identified in Appendix A5, are insignificant	Very few signs are proposed, and will be of a small scale (being for the purpose of providing instruction) and will have less than minor adverse effect on the natural character values. I consider the proposal can be consistent with this policy

Heritage

	<u>Objective/Policy</u>	<i>Is the proposal Consistent with or Inconsistent with the Objective?</i>
Objective 13.2.2	The heritage values of scheduled heritage sites are protected.	The proposed development of the site will involve minimal earthworks in terms of cuts, with most earthworks resulting in fill being placed over the existing ground. Where cuts will be required (including when preparing the ground for landscape planting) the presence of an archaeologist will be required. There is a concern that the proposal to undertake minimal work on the site may result in damage, and therefore monitoring will be required. I consider the proposal is consistent with this objective and policy.
Policy 13.2.2.1	Only allow new buildings and structures, additions and alterations, network utility activities, public amenities, natural hazard mitigation activities, transportation activities, and parking, loading and access on a scheduled heritage site where the heritage values of the site are protected, including by ensuring: a. ... d. scheduled heritage sites that are primarily open space are protected from inappropriate development; and; e.	
Objective 13.2.4	Dunedin's archaeological sites are protected from inappropriate development and use.	
Policy 13.2.2.1	Require an archaeological authority to be obtained, if one is required, prior to undertaking earthworks on a scheduled archaeological site.	

Manawhenua

	<u>Objective/Policy</u>	<i>Is the proposal Consistent with or Inconsistent with the Objective?</i>
Objective 14.2.1	The relationship between Manawhenua and the natural environment is maintained or enhanced, including the cultural values and traditions associated with: a. wāhi tūpuna; b. mahika kai; and c. occupation of original native reserve land through papakāika.	The proposed development of the site will involve minimal earthworks in terms of cuts, with most earthworks resulting in fill being placed over the existing ground. Where cuts will be required (including when preparing the ground for landscape planting) the presence of an archaeologist will be required, and Manawhenua will be invited to attend. There is a concern that the proposal to undertake minimal work on the site may result in damage, and therefore monitoring will be required. Effects on the additional demand of activity on the estuary is addressed above in terms of restricting direct access from the site to the estuary, and the proposed conditions on landscaping will reduce the visual impact.
Policy 14.2.1.1	Only allow activities in or adjacent to wetlands and coastal and riparian areas that are wāhi tūpuna and are identified as having mahika kai values in Appendix A4, where adverse effects on mahika kai are avoided or, if avoidance is not practicable, are no more than minor.	
Policy 14.2.1.4	Only allow activities that are identified as a threat to wāhi tūpuna in Appendix A4,	

	where adverse effects on the relationship between Manawhenua and the wāhi tūpuna are avoided or, if avoidance is not practicable, are no more than minor.	In terms of effects on mahika kai, the capacity of the wastewater treatment system is a concern. I consider the proposal is consistent with this objective and policies, provided the adverse effects from increased demand on the wastewater treatment system can be addressed.
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Residential Zones

	<u>Objective/Policy</u>	<i>Is the proposal Consistent with or Inconsistent with the Objective?</i>
Objective 15.2.1	Residential zones are primarily reserved for residential activities and only provide for a limited number of compatible activities, including: visitor accommodation, community activities, major facility activities, and commercial activities that support the day-to-day needs of residents.	The proposed development, being visitor accommodation, is considered to be a compatible activity. I consider the proposal is consistent with this objective and policy.
Policy 15.2.1.2	Provide for a limited range of major facility activities and commercial activities, including dairies, registered health practitioners, training and education, and visitor accommodation, where the effects of these activities will be managed in line with objectives 15.2.3 and 15.2.4, and their policies.	
Policy 15.2.1.4	Require activities ancillary to visitor accommodation to be located and designed to cater to patrons of the primary activity rather than the general public.	No other ancillary activities are proposed. I consider the proposal is consistent with this policy.
Objective 15.2.3	Activities in residential zones maintain a good level of amenity on surrounding residential properties and public spaces.	The proposed activity involves minimal buildings. The campervan parking spaces will have suitable setback from the site boundaries, which will include landscaping, and will be located well away from existing residential sites and dwellings. The restriction on hours will address concerns about noise from the driveway. I consider the proposal is consistent with this objective and policies.
Policy 15.2.3.1	Require buildings and structures to be of a height and setback from boundaries that ensures there are no more than minor effects on the sunlight access of current and future residential buildings and their outdoor living spaces.	
Policy 15.2.3.4	Only allow schools, emergency services, early childhood education, community and leisure - large scale, sport and recreation, registered health practitioners, training and education, visitor accommodation, supported living facilities, service stations and stand-alone car parking where they are designed and located to avoid or, if avoidance is not practicable, adequately mitigate, adverse effects on the amenity of surrounding residential properties.	
Objective 15.2.4	Activities maintain or enhance the amenity of the streetscape, and reflect the current or intended future character of the neighbourhood.	The amenity values of the residential area will be maintained. In terms of streetscape, the site is a rear site and the campsite will not be visible from Bay Road. In terms of the character of the neighbourhood, the proposal will retain the open character of the site. I consider the proposal is consistent with the objective and policies.
Policy 15.2.4.1	Require development to maintain or enhance streetscape amenity by ensuring: a. garages, carports and car parking do not dominate the street; b. there are adequate green space areas free from buildings or hard surfacing;	

	c. buildings' height and boundary setbacks, and scale reflect the existing or intended future residential character; d. shared service areas are not visible from ground level from outside the site; and e. outdoor storage is managed in a way that does not result in unreasonable visual amenity effects or create nuisance effects.	
Policy 15.2.4.7	Only allow schools, emergency services, early childhood education, community and leisure-large scale, sport and recreation, registered health practitioners, training and education, visitor accommodation, supported living facilities, restaurants or retail ancillary to sport and recreation, service stations and stand-alone car parking where they are designed and located to avoid or, if avoidance is not practicable, adequately mitigate, adverse effects on streetscape amenity.	
Policy 15.2.4.4	Require fences to be of a height and design that contributes positively to the streetscape amenity and character of the neighbourhood.	Any fences required to direct pedestrians away from sensitive indigenous salt marsh vegetation, due to costs. will most likely be a simple post and wire construction. I consider the proposal is consistent with this policy.
Policy 15.2.4.5	Require ancillary signs to be located and designed to maintain residential amenity including by being of an appropriate size and number to convey information about the name, location and nature of the activity on-site to passing pedestrians and vehicles and not being oversized or too numerous for what is necessary for that purpose.	Very few signs are proposed, and will be of a small scale in keeping with the residential character. I consider the proposal is consistent with this policy.

Rural Zones

	<u>Objective/Policy</u>	<u>Is the proposal Consistent with or Inconsistent with the Objective?</u>
Objective 16.2.1	Rural zones are reserved for productive rural activities and the protection and enhancement of the natural environment, along with certain activities that support the well-being of communities where these activities are most appropriately located in a rural rather than an urban environment. Residential activity in rural zones is limited to that which directly supports farming or which is associated with papakāika.	The proposed development, being visitor accommodation, partly occurs on the Rural zone and partly on the Residential zone. The Rural zone portion of the site is not particularly suited for productive rural activities, but is suited for protection and enhancement of the natural environment. The proposed development will mean that productive rural activities are unlikely to occur, and does provide for potential conservation activities (including protection of the archaeological sites) on land not used as camping sites, although significant conservation activities have not been proposed.
Policy 16.2.1.1	Enable farming, grazing and conservation in the rural zones.	
Policy 16.2.1.4	Only allow visitor accommodation in the rural zones where it supports productive rural activities or a significant conservation activity on the same property.	I consider the proposal is in general inconsistent with this objective and policies.
Objective 16.2.2	The potential for conflict between activities within the rural zones, and between activities within the rural zones	The proposed activity would not conflict with rural activities, and as noted above is compatible with the adjoining residential zone.

	and adjoining residential zones, is minimised through measures that ensure: - the potential for reverse sensitivity in the rural zones is minimised; - the residential character and amenity of adjoining residential zones is maintained; and - a reasonable level of amenity for residential activities in the rural zones.	I consider the proposal is consistent with this objective and policies.
Policy 16.2.2.5	Only allow rural tourism-large scale, rural research-large scale (outside the Invermay Farm mapped area), rural contractor and transport depots-large scale, community and leisure-large scale, sport and recreation, veterinary services, visitor accommodation, cemeteries, crematoriums, intensive farming, domestic animal boarding and breeding (including dogs), rural industry, mining, service stations, or landfills where adverse effects on the amenity of residential activities on surrounding properties will be avoided or, if avoidance is not practicable, adequately mitigated.	
Objective 16.2.3	The rural character values and amenity of the rural zones are maintained or enhanced, elements of which include: - a predominance of natural features over human made features; - a high ratio of open space, low levels of artificial light, and a low density of buildings and structures; - buildings that are rural in nature, scale and design, such as barns and sheds; - a low density of residential activity, which is associated with rural activities; - a high proportion of land containing farmed animals, pasture, crops, and forestry; - extensive areas of indigenous vegetation and habitats for indigenous fauna; and - other elements as described in the character descriptions of each rural zone located in Appendix A7.	The character values and amenity will be maintained. Much of the site will remain as open space, and there will be no significant building development. The small kiosk and campervan parking spaces will have suitable setback from the site boundaries. I consider the proposal is consistent with the objective and policies.
Policy 16.2.3.1	Require buildings and structures to be set back from site boundaries and of a height that maintains the rural character values and visual amenity of the rural zones	
Policy 16.2.3.6	Only allow community and leisure - large scale, sport and recreation, early childhood education, service stations, and visitor accommodation where the adverse effects of development on rural character and visual amenity are avoided or, if avoidance is not practicable, no more than minor.	
Policy 16.2.3.7	Require ancillary signs to be located and designed to maintain rural character and visual amenity, including by being of an appropriate size and number to convey information about the name, location, and nature of the activity on-site to passing pedestrians and vehicles and not being oversized or too numerous for that purpose.	Very few signs are proposed, and will be of a small scale in keeping with the rural character. I consider the proposal is inconsistent with this policy.

Overall Objectives and Policies Assessment

- [110] Although consideration should be given to the weight each Plan has, it is considered that the proposed activity is generally consistent with the objectives and policies of both district plans, except for Policy 16.2.1.4 of the Proposed 2GP which requires visitor accommodation to only be allowed where it supports productive rural activities or a significant conservation activity on the same property.

DECISION MAKING FRAMEWORK

Part 2 Matters

- [111] Consideration is given to the ability of the proposal to meet the purpose of the Act, which is to promote sustainable management of natural and physical resources. Other resource management issues require consideration when exercising functions under the Act. The relevant sections are:

- 5(2)(a) “sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations”;
- 5(2)(b) “safeguarding the life-supporting capacity of air, water, soil, and ecosystems”;
- 5(2)(c) “avoiding, remedying or mitigating any adverse effects of activities on the environment”,

Matters of National Importance:

- 6(a) “the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development”.
- 6(e) “the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga”.
- 6(f) “the protection of historic heritage from inappropriate subdivision, use, and development”.

Other Matters to have particular regard to:

- 7(a) “kaitiakitanga”;
- 7(aa) “the ethic of stewardship”;
- 7(b) “the efficient use and development of natural and physical resources”;
- 7(c) “the maintenance and enhancement of amenity values”;
- 7(f) “maintenance and enhancement of the quality of the environment”; and
- 7(g) “any finite characteristics of natural and physical resources”.
- 7(i) “the effects of climate change”.

- [112] I consider the purpose of the RMA will be met, provided that the effect on the capacity of the wastewater treatment plant is addressed.

- [113] With regard to Sections 6(a), 7(c) and 7(f), it is considered that the proposed activity can be managed so that the natural character will be preserved, and that the proposal is not inappropriate development for the location, noting that some of the site is zoned Residential.

- [114] With regard to Sections 6(e), 6(f), 7(a) and 7(aa), it is considered that the proposed activity will have minor adverse effects on the relationship of Maori to the site and on historic

heritage, provided earthworks are supervised by an archaeologist, and the local iwi is invited to be present when earthworks are occurring.

- [115] With regard to Section 7(b), it is considered that the proposed activity is an efficient use and development, as it will provide a recreational use within an area that is predominantly recreational in nature.
- [116] With regard to Section 7(g), it is considered that the proposed activity will lock up future uses of the site, such as residential activity, as no permanent structures are proposed on the land.
- [117] With regard to climate change, while the use of fossil fuel powered campervans and generators is something that will ultimately need to be replaced, at present their use is part of the current society. In terms of sea level rise, the site is at a higher level than the freedom camping site, and in the event of a storm surge, the vehicles could be moved if sufficient warning is provided.

Section 104D

- [118] Section 104D of the Act specifies that a resource consent for a non-complying activity must not be granted unless the proposal can meet one of two limbs. The limbs of Section 104D require either that the adverse effects on the environment will be no more than minor, or that the application is for an activity which will not be contrary to the objectives and policies of either the relevant plan or the relevant proposed plan. Only one of the two tests outlined by Section 104D need be met in order for Council to be able to assess the application under Section 104 of the Act.
- [119] As discussed above in the assessment of effects, overall I consider that the actual and potential adverse effects associated with the proposed development will be able to be mitigated by imposing consent conditions so as to be no more than minor and therefore the first 'gateway' test of Section 104D is met.
- [120] In order for a proposal to fail the second test of Section 104D, it needs to be contrary to the objectives and policies of both the Dunedin City District Plan and the proposed 2GP. In order to be deemed contrary, an application needs to be repugnant to the intent of the District Plan and abhorrent to the values of the zone in which the activity was to be established. It is noted that in this instance, the proposal is assessed as being generally consistent with the relevant objectives and policies of both plans. The proposed development is therefore considered to also satisfy the second 'gateway' test outlined by Section 104D.
- [121] In summary, the application passes both the threshold tests in Section 104D of the Act and therefore, in my opinion, it is appropriate for the Committee to undertake a full assessment of the application in accordance with Section 104 of the Act. In turn, consideration can therefore be given to the granting of the consent.

Section 104

- [122] Section 104(1)(a) states that the Council must have regard to any actual and potential effects on the environment of allowing the activity. This report assessed the environmental effects of the proposal and concluded that the likely adverse effects of the proposed development overall will be minor and can be adequately avoided remedied or mitigated provided recommended conditions of consent were adhered to.

- [123] Section 104(1)(ab) requires the Council to have regard to any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects. As noted above no specific measures have been proposed, although the implementation of landscaping on the site will improve the biodiversity for the area.
- [124] Section 104(1)(b)(vi) requires the Council to have regard to any relevant objectives and policies of a plan or proposed plan. This report concluded that the application would be generally consistent with the relevant objectives and policies of both district plans.
- [125] Sections 104(1)(b)(iv) and (v) requires the Council to have regard to any relevant coastal and regional policy statement. Having viewed the various versions of the Regional Policy Statement for Otago and the New Zealand Coastal Policy Statement, they are not considered to provide any specifically relevant provisions that are not addressed under the district plans..

Other Matters

- [126] Section 104(1)(c) requires the Council to have regard to any other matters considered relevant and reasonably necessary to determine the application.
- [127] Case law indicates that for the Council to grant consent to a non-complying activity, the application needs to be a 'true exception', otherwise an undesirable precedent may be set and the integrity of the District Plan may be undermined.
- [128] In this regard, I do not consider that the proposed activity represents a challenge to the integrity of the 2006 Plan and the Proposed 2GP. The proposal involves a site that is unique for Dunedin, being split zoned and in an area where recreational activity occurs, I consider that its potential approval would be unlikely to undermine public confidence in the plans' provisions.
- [129] For the above reasons, I consider that approval of the proposal will not undermine the integrity of the Plans as the activity will produce only localised and minor effects. I therefore do not consider that the Committee needs to be concerned about the potential for an undesirable precedent to be set in this regard.

CONCLUSION

- [130] Having regard to the above assessment, I recommend that the application be granted subject to appropriate conditions

DRAFT DECISION IF THE COMMITTEE DECIDES TO GRANT THE APPLICATION

Land Use LUC-2020-293

*That pursuant to section 34A(1) and 104C and after having regard to section 104 of the Resource Management Act 1991, and the Operative Dunedin City District Plan 2006 and the Proposed Second Generation Dunedin City District Plan (Proposed 2GP), the Dunedin City Council **grants** consent to a **non-complying** activity being the establishment of a camping site for self-contained vehicles or caravans and associated earthworks at 20 Bay Road, Warrington Dunedin, legally described as Part Lot 1 Deposited Plan 5855 and Lot 1 Deposited Plan 10272 (held in Record of Title OT13B/973), subject to conditions imposed under section 108 of the Act.*

Conditions

LUC-2018-293

1. *The proposed activity must be undertaken in general accordance with the approved plans attached to this certificate as Appendix One, and the information provided with the resource consent application received by the Council on 2 July 2020 and a range of further information which was collated, finalised and received on 22 April 2021, except where modified by the following conditions:*
2. *The consent holder must provide notice to the Resource Consent Monitoring team by email to rcmonitoring@dcc.govt.nz of the start date of the works. This notice must be provided at least five (5) working days before the works are to commence. This notice must also be provided at least five (5) working days before the works are to commence to Heritage New Zealand Pouhere Taonga (HNZPT) and Aukaha. The notice to Aukaha must include an invitation for a representative from Kāti Huirapa Runaka ki Puketeraki to attend the site during all earthworks.*
3. *The consent holder must:*
 - a. *be responsible for all contracted operations relating to the exercise of this consent; and*
 - b. *ensure that, prior to undertaking work on the site, all personnel (contractors) working on the site are made aware of the conditions of this consent, have access to the contents of consent documents and must be briefed by a suitably qualified archaeologist on the legislative requirements of working within archaeological sites; and*
 - c. *ensure compliance with the consent conditions.*

Landscaping

4. *Prior to any works being undertaken on the site, a finalised landscaping plan must be prepared in consultation with the Council's Landscape Architect, and approved by the Resource Consent Manager. The intention of the planting is to provide screening of the site from residential sites to the north (including the driveway), and from public places to the east, south and west, and a softening effect between the rows of parking spaces. The landscaping plan must also provide planting and possible fencing to discourage users of the site from accessing directly from the site on to the indigenous saltmarsh vegetation located to the west of the site.*
5. *The landscaping plan must detail the: width of planting to provide a multi-layered screening effect, and the location, quantities, grades, and species to be planted; the location and construction of any fencing; and the location, screening and colour of the kiosk and bins. It must also specify the measures to be taken to ensure successful establishment and for ongoing management of the planting. All new planting must be comprised of indigenous species appropriate to the character of the site (as listed in Appendix Two of this certificate). The landscaping plan must include detail on the ongoing management of the existing native and exotic species to ensure that screening and context by vegetation of sufficient scale, is always maintained. The landscaping plan must also set out the process for the eventual progressive removal of the existing older exotic trees as they near the end of their useful lifespan, and their replacement with appropriate indigenous species. This process must ensure the screening of the site is appropriately maintained throughout.*
6. *The consent holder must maintain all planting in a good and healthy condition. Any planting not in a good and healthy condition that is removed, dies or is defective in any way must be replaced by the consent holder so as to be in accordance with the approved landscaping in Condition 4.*

7. *All earthworks associated with the ground preparation for landscaping must be supervised by a suitably qualified archaeologist.*
8. *The landscaping must be completed prior to the use of the site commencing.*

Earthworks and development of the site

9. *As a first principle, every practical effort must be made to avoid damage to any archaeological site, whether known, or discovered during any development of the site.*
10. *Prior to earthworks being undertaken on the site, a technical specification of the pavement design must be prepared in accordance with construction considerations recommended in the Pavement Options Memo submitted with the resource consent application. The technical specification must be approved by a suitably qualified archaeologist and sent to the Council prior to the works commencing.*
11. *All works that disturb the existing ground surface must be supervised by an appropriately qualified archaeologist. Any archaeological features or recovered material must be appropriately recorded and analysed.*
12. *If at any stage during the development Māori material is discovered, the suitably qualified archaeologist must 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.*
13. *A full report on any archaeological material that is found must be prepared by the suitably qualified archaeologist and submitted to the HNZPT within three months of the completion of archaeological site works.*

Camping activity

14. *The maximum number of vehicles permitted in the camping site at any time must be 60 vehicles.*
15. *The use of the site for camping on a temporary basis must be restricted to NZMCA financial members travelling in NZS 5465:2001 certified self-contained vehicles only.*
16. *Any individual vehicle must only occupy the camping site for a maximum of 7 nights in any 30 day period.*
17. *Vehicles must not arrive onsite or leave the site during 'night time hours' of 10pm – 7am.*
18. *Generators must not be used within the site between the hours of 8:00pm and 8:00am, and advice to this effect must be included on the camping information sign erected on site.*
19. *The camping information sign erected on the site must:*
 - a. *advise campers to avoid damaging the indigenous saltmarsh vegetation located to the west of the site.*
 - b. *advise campers to that they must not disturb the ground within the site.*
 - c. *encourage campers not to arrive/depart during the evening shoulder period between 7pm – 10pm.*
 - d. *encourage campers to avoid using the public dump station in the DCC Reserve where possible.*

20. Information about the site that is circulated or made available to NZMCA members (such as on websites) must also include advice about condition 14-19 and 25. For condition 19d this would include advice that members should use dump stations either north or south of Warrington prior to arriving or after leaving.
21. The activity must 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.
22. Noise level measured at the boundary of the site must not exceed the following noise emission limits:

Daytime 7am to 7pm	7 pm to 10 pm	Night time 10pm to 7am
0700 – 1900 hours	1900 – 2200 hours	2200 – 0700 hours
50 dB LAeq (15 min)	45 dB LAeq (15 min)	i. 40 dB LAeq (15 min); and ii. 70 dB LAF max.

Noise must be measured in accordance with NZS6801:2008 - Acoustics - Measurement of environmental sound, and assessed in accordance with NZS6802:2008 Acoustics - Environmental noise'

23. If at any time during the operation of the camping ground the ground surface (other than fill that has been placed by the consent holder) is disturbed, a suitably qualified archaeologist must be immediately contacted and remediation work must be undertaken under the direction of the suitably qualified archaeologist.

Vehicle Access

24. Vehicle access to the site for the purpose of NZMCA members camping at the site must be via Bay Road only.
25. NZMCA must communicate to their members that they must enter the site via Hill Road following the existing signage indicating the route towards the Warrington Domain, and must include a sign on the driveway advising those leaving the site that they must turn right towards Hill Road. Note: one means of achieving this is an online route map.
26. The vehicle access must be a minimum 6.0m formed width, hard surfaced from the edge of the Bay Road carriageway to a distance no less than 15.0m inside the property boundary and be adequately drained.
27. The surfacing/pavement design for the vehicle access and Stage 2 parking areas must be specifically designed by a suitably qualified person, and the pavement construction of these areas must be certified by a suitably qualified person as having been constructed to an appropriate standard. The design and certification must be submitted to DCC Transport, prior to commencement of the activity.
28. The consent holder must undertake photographic monitoring of the ground conditions over the first winter season and provide visual documentation (photos) to the DCC Transport Group within five working days. Should the integrity of the ground be compromised i.e., grass or soil is exposed due to circulation during wet weather then, in consultation with a suitably qualified archaeologist, Pavement Type 3 must be considered in the first instance, followed by consideration of Pavement Type 1 to remediate the

situation. Note any remediation will need to comply with the earthworks conditions 9-13 above.

29. The gate at the northern end of the vehicle access must be set back at least 15m inside the property from the boundary with Bay Road to allow sufficient vehicle queuing space.
30. The vehicle crossing, between the road carriageway and the property boundary must be constructed in accordance with Dunedin City Council's Industrial Specification for Vehicle Entrances.

Bay Road Upgrade

31. The consent holder must construct a gravelled/metalled shoulder on the northern side of Bay Road (between the site access and intersection Bay Road/Hill Road intersection). The shoulder must be no less than 0.8m wide and desirably 1.0m wide.
32. Detailed engineering plans, showing the details of the upgrading/widening of Bay Road required by Condition 21, must be submitted to and approved by the DCC Transport Group prior to construction.
33. Upon completion of upgrading/widening of Bay Road, all works must be tested to demonstrate that they meet the acceptance requirements of the DCC Code of Subdivision and Development and/or alternative land development engineering standards as accepted by the Council.
34. Upon completion of all of the roading works, the works must be certified as having been constructed in accordance with the approved plans and specifications, and as-built plans shall be provided to the DCC Transport Group.

Note: The shoulder width may vary depending on physical constraints adjacent to the existing seal.

Road Safety Audit

35. Within one year, but no sooner than six months, after the commencement of the campground activity (i.e., inclusive of the peak summer period) the consent holder shall engage a suitably qualified traffic/transportation engineer to undertake, and submit to DCC Transport Group, a Road Safety Audit (RSA) of Bay Road (between the site and the intersection with Hill Road) and the Bay Road/Hill Road intersection. The suitably qualified traffic/transportation engineer must either determine whether the intersection is operating to an appropriate level of safety/efficiency or make recommendations on the necessary improvements.

Note: The applicant is only responsible for undertaking a post-construction RSA and will not be responsible for implementing any necessary physical works as recommended by the RSA. Instead, this responsibility lies with the Council.

Review

36. The Council may review conditions 4, 17, 18, 19, 23 and 25 by giving notice of its intention to do so pursuant to Section 128 of the Resource Management Act 1991 at any time following the commencement of this consent, for the purpose of ensuring the provisions for the management of noise, the archaeological site, screening, biodiversity, wastewater disposal and traffic effects are adequate for dealing with the adverse effects of the activity.

Advice Notes

Earthworks

1. An archaeological authority under Section 44 of the HNZPTA 2014 must be obtained from HNZPT prior to any modification of the site.

Transportation

2. The vehicle crossing, between the road carriageway and the property boundary, is within legal road and will therefore require a separate Vehicle Entrance Approval from DCC Transport to ensure that the vehicle crossing is constructed in accordance with the Dunedin City Council Vehicle Entrance Specification (note: this approval is not included as part of the resource consent process).

Noise

3. In addition to the conditions of a resource consent and the noise standards of the Proposed Second Generation Dunedin City District Plan, the Resource Management Act 1991 establishes through sections 16 and 17 a duty for all persons to avoid unreasonable noise, and to avoid, remedy or mitigate any adverse effect created from an activity they undertake.

Infrastructure

4. Detail of the water supply application process can be found at <http://www.dunedin.govt.nz/services/water-supply/new-water-connections>.
5. All aspects relating to the availability of water for fire-fighting should be in accordance with SNZ PAS 4509:2008, being the Fire Service Code of Practice for Fire Fighting Water Supplies, unless otherwise approved by the New Zealand Fire Service.

General

6. Resource consents are not personal property. The ability to exercise this consent is not restricted to the party who applied and/or paid for the consent application.
7. It is the responsibility of any party exercising this consent to comply with any conditions imposed on the resource consent prior to and during (as applicable) exercising the resource consent. Failure to comply with the conditions may result in prosecution, the penalties for which are outlined in section 339 of the Resource Management Act 1991.
8. The lapse period specified above may be extended on application to the Council pursuant to section 125 of the Resource Management Act 1991.
9. This is a resource consent. Please contact the Council's Building Services Department, about the building consent requirements for the work.

REASONS FOR RECOMMENDATION

- [131] Provided that the recommended conditions of consent are implemented, I consider that the likely adverse effects of the proposed activity can be adequately mitigated and will be minor.

- [132] The proposal is considered to be generally consistent with the key relevant objectives and policies of both the Dunedin City District Plan 2006 and the Proposed Second Generation Dunedin City District Plan.
- [133] The proposal is considered to be consistent with the objectives and policies of the Regional Policy Statement for Otago.
- [134] As the proposal is considered likely to give rise to adverse effects that will be no more than minor, and will not be contrary with the objectives and policies of the District Plan, the proposal is considered to meet both 'limbs' of the Section 104D 'gateway test'. Consideration can therefore be given to the granting of consent to the proposal.
- [135] The proposal is considered to be a true exception for the following reasons: The proposal involves a site that is unique for Dunedin, being split zoned and in an area where recreational activity occurs, I consider that its approval would be unlikely to undermine public confidence in the plans' provisions.

Report prepared by:



Robert Buxton
Consultant Planner

16 August 2020

Date

Report checked by:

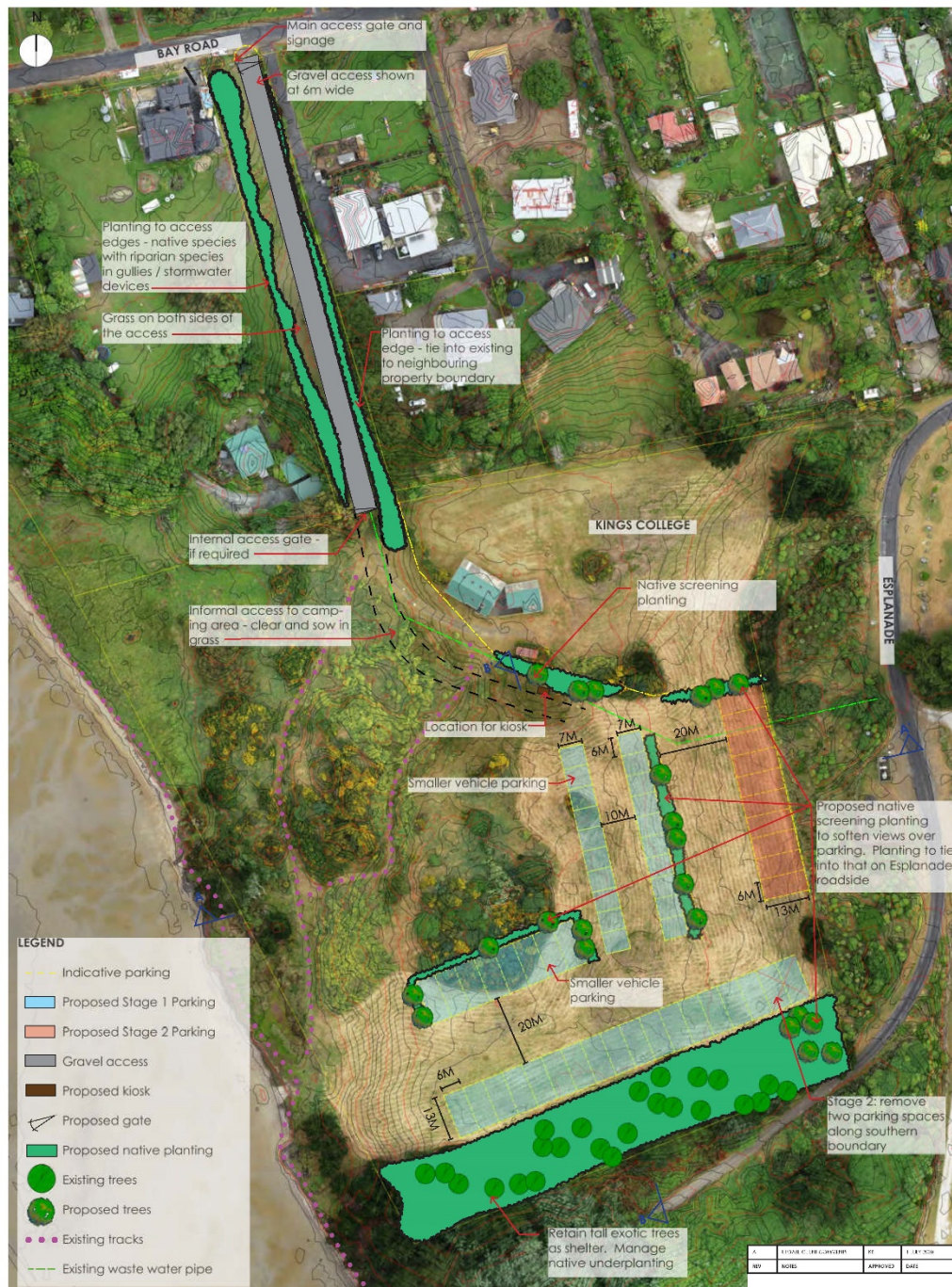


Campbell Thomson
Senior Planner

16 August 2020

Date

Appendix One: Approved Plans for LUC-202-293 (scanned images, not to scale)



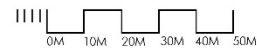
NZMCA - 20 BAY ROAD WARRINGTON

LANDSCAPE PLAN



SHEET 1 OF 2

1:1000 @ A3



FOR CONSENT | 30 JUNE 2020

Landscape Design

The NZMCA site at 20 Bay Road Warrington, lies approximately half an hour drive north of Dunedin via SH1 and the Coast Road. The site, not currently owned by the NZMCA, is vacant except for a building in the north-east corner which is used by Kings High School for outdoor education activities. The NZMCA have used the site for a short-time in the past as a short stay motor caravan park, under a previous informal arrangement with the current land owner. The NZMCA are investigating the permanent use of the site as a campground. Primary access to the site will continue to be from Bay Road. Pedestrian access to the coastal pathway, south of the site, will remain unchanged. Access arrangements with Kings High School will also be maintained.

20 Bay Road forms part of a small coastal peninsula bound by the calm waters of Blueskin Bay to the west, highly valued for recreational pursuits, and the Pacific Ocean to the east. There is an existing freedom camping site at the neighbouring Warrington Domain (managed by Dunedin City Council) off the Esplanade Road to the east. The site overall has a dome shape, with gently undulating plateau above the bay. The settlement of Warrington gives way to Porteous Hill, Hammond Hill and the Silver Peaks Range beyond, that provide the inland backdrop to the site.

On the western side, the site rises up inland from Blueskin Bay, with the existing coastal pathway outside the site boundary. A broad grass bank forms the main access down to the waters edge, with the remainder of the eastern bank covered in low growing scrub, in predominantly exotic weed species. The scrub is bisected by a small network of trails enabling walking and cycle access to and from the coastal pathway and the bay. The site is surfaced in pasture grass that is maintained by the landowner. Pockets of native and exotic vegetation, dominated by Ngaio, bracken, grass species and gorse exist at the top of the plateau on the eastern side. The site is sheltered from southerly winds by a wide strip of mature pines that run the length of the southern boundary. The land immediately beyond the eastern boundary of the site has been restored with native planting (Pittosporum, Mapou, Ti kouka, Toetoe and Harakeke, among others) that has achieved a suitable height and ground coverage.

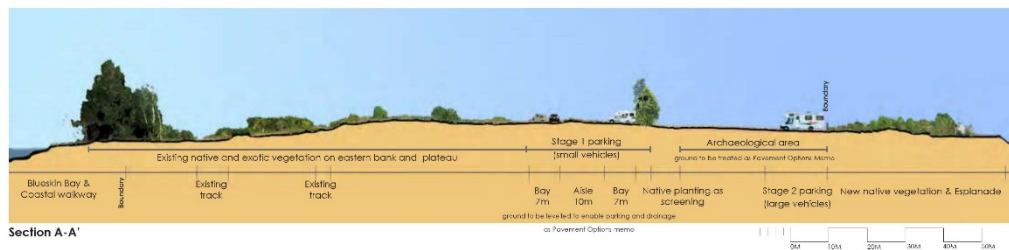
Access to the site is from Bay Road, down a gravel driveway, shared with the Kings High School property. The accessway is proposed to be widened to 6m. The gravel formation will end at the shared way between the camping area and the Kings College site. From there NZMCA members, as per membership rules, will travel along an unformed track, of which scrub will need to be cleared to enable, and sign in on arrival at a small

kiosk on the northern boundary. The site will be visually screened from the Kings High School buildings and surrounding residential properties with native planting to the northern boundary. This multi layered planting is to be of a depth and height to enable visual screening of camper vans and vehicles to adjacent properties. All planting on site is to be native, and eco-sourced, based on the list provided.

Parking as part of the Stage 1 proposal is focussed in the western part of the site. Small vehicles will be able to park in 20 No. bays, two rows that run north-south at the edge of the existing scrub. A strip of native planting will be included to the eastern edge of this to further provide screening to adjacent properties. Larger vehicles can park on the southern boundary (18 No.) and opposite, with a 20 m isle between. The eight parks opposite will also have a strip of native planting surrounding. The stand of pine trees on the southern boundary is to be retained and managed by the NZMCA.

Stage 2 parking will be along the eastern boundary, subject to archaeological protocols to protect artefacts. Surface treatment and drainage requirements are discussed in the Pavement Options Memo and the application for resource consent.

Cross Sections



Plant Lists

The soil is free draining with a sand base, and the site is largely dry throughout the camping season. The western edge of the peninsula is shown as Sand Dune Forest on the Dunedin City Council Native Planting Guide. The following species are recommended based on their suitability as 'generalists' and to flourish on 'dry sites' in the DCC NPG Sand Dune Forest list¹. The DCC list is supplemented with native species observed on Esplanade, beyond the eastern boundary of the camping area.

Trees

Dacrydium dactyloides
Melicope ramiflora
Podocarpus totara
Prumnopitys taxifolia
Cordyline australis

Kahikatea
Mahoe
Totara
Matai
Ti kouka

Shrubs

Grisebina littoralis
Myrsine australis
Pittosporum tenuifolium

Broadleaf
Mapou
Kohuhu

Coprosma lucida
Myoporum laetum
Austroderia sp.
Astelia fragrans

Karamu
Ngaio
Toetoe
Kakahu

Ferns

Asplenium obtusatum
Microsorium pustulatum
Pteridium esculentum

Coastal spleenwort
Hounds tongue fern
Rarauhe, Bracken fern - areas of restoration only

¹ https://www.dunedin.govt.nz/_data/assets/pdf_file/0004/732858/DCC-NPG-ecology-species-list-sand-dune-forest.pdf

NZMCA - 20 BAY ROAD WARRINGTON

LANDSCAPE PLAN



SHEET 2 OF 2

Scale as shown

REVISION	DATE	BY	DATE
1	1 JUL 2020		

DRAWN	KT	CHECKED	ES	PROPOSED	ED	APPROVED	DP
FOR CONSENT 30 JUNE 2020							

Appendix Two: Recommended Planting

Appendix 2.

Species list for sand dune forest (native screen planting and native underplanting).

Podocarp-broadleaved forest on coastal sand dunes often dominated by Hall's totara, kanuka and ngaio. A rare forest type with few local remnants. The closest best examples are in the Catlins and at Otatara in Southland. Some elements of coastal shrubland are included.

Source: Wildland Consultants Ltd. 2013. *Plant Lists for Dunedin Ecosystems. Contract Report No. 3237 Prepared for the Dunedin City Council.*

Plant type	Species	Common name	Generalist	Wetland sites	Riparian sites	Dry sites	Moist sites	Exposure	Shade tolerance	Planting sequence	Palatability	Fleshy fruits?	Nectar sources	Notes
Tree	<i>Cordyline australis</i>	Cabbage tree	Yes	Margins	Yes	Yes	Yes	Yes	Moderate	Early	High	No	Yes	Fast growing tree with wide environmental tolerance
Tree	<i>Dacrycarpus dacrydioides</i>	Kahikatea	Yes	Yes	Yes	Yes	Yes	Yes	High	Early	Low	Yes	No	Long-lived emergent podocarp
Tree	<i>Griselinia littoralis</i>	Broadleaf	Yes	No	Yes	Yes	Yes	Yes	High	Early	High	Yes	No	Good all round performance
Tree	<i>Meliccytus ramiflorus</i>	Mahoe	Yes	No	Yes	Yes	No	No	High	Early	High	Yes	Yes	Plant later in exposed sites
Tree	<i>Myoporum laetum</i>	Ngaio	No	No	No	Yes	No	Yes	Moderate	Early	Low	No	No	Fast growth in coastal sites
Tree	<i>Myrsine australis</i>	Mapou	Yes	No	Yes	Yes	No	Yes	High	Early	High	Yes	No	Slow initial growth
Tree	<i>Pittosporum tenuifolium</i>	Kohuhu	Yes	No	Yes	Yes	No	Yes	Moderate	Early	High	Yes	Yes	Pioneer species good for initial plantings
Tree	<i>Podocarpus laetus</i>	Hall's totara	Yes	No	Yes	Yes	No	Yes	Low	Early	Low	Yes	No	Long-lived emergent podocarp

Plant type	Species	Common name	Generalist	Wetland sites	Riparian sites	Dry sites	Moist sites	Exposure	Shade tolerance	Planting sequence	Palatability	Fleshy fruits?	Nectar sources	Notes
Tree	<i>Prumnopitys taxifolia</i>	Matai	Yes	No	Yes	Yes	No	No	High	Later	Low	Yes	No	Long-lived emergent podocarp
Shrub	<i>Hebe elliptica</i>	Shore hebe	No	No	No	Yes	No	Yes	Low	Early	Moderate	No	Yes	Indicator for this habitat
Shrub	<i>Coprosma lucida</i>	Shining karamu	Yes	No	Yes	Yes	Yes	No	High	Early	High	Yes	No	Understorey shrub
Monocot herb	<i>Libertia ixioides</i>	Turutu	No	No	No	Yes	No	Yes	High	Later	Low	Yes	No	Ground cover species
Monocot herb	<i>Phormium tenax</i>	Harakeke	Yes	Yes	Yes	No	Yes	Yes	Low	Early	Moderate	No	Yes	Excellent for initial shelter and high value for indigenous fauna
Monocot herb	<i>Astelia fragrans</i>	Kakahu	Yes	No	Yes	No	Yes	No	High	Later	Moderate	Yes	Yes	Common forest floor species
Fern	<i>Asplenium bulbiferum</i>	Hen and chicken fern	Yes	No	Yes	No	Yes	No	High	Later	Low	No	No	Common fern of moist forest
Fern	<i>Asplenium obtusatum</i>	Coastal spleenwort	No	No	No	Yes	No	Yes	High	Later	High	No	No	Coastal fern, typically abundant in coastal scrub
Fern	<i>Microsorium pustulatum</i>	Hound's tongue fern	Yes	No	Yes	Yes	Yes	No	High	Early	Low	No	No	Forms extensive ground cover
Fern	<i>Polystichum neozelandicum</i> subsp. <i>xerophyllum</i>		No	No	No	Yes	No	No	High	Later	Moderate	No	No	Fern of dry forest habitats
Fern	<i>Polystichum vestitum</i>	Shield fern	Yes	No	Yes	No	Yes	No	High	Later	Moderate	No	No	Ground cover fern of moist habitats

Additional species list of coastal shrubland and sand dune sedgeland plants for accessway planting.

Source: Wildland Consultants Ltd. 2013. Plant Lists for Dunedin Ecosystems. Contract Report No. 3237 Prepared for the Dunedin City Council.

Plant type	Species	Common name	Generalist	Wetland sites	Riparian sites	Dry sites	Moist sites	Exposure	Shade tolerance	Planting sequence	Palatability	Fleshy fruits?	Nectar sources	Notes
Tree/shrub	<i>Coprosma crassifolia</i>		No	No	No	Yes	No	Yes	Moderate	Later	Low	Yes	No	Exposure-tolerant shrub of dry habitats
Shrub	<i>Coprosma acerosa</i>		No	No	No	Yes	No	Yes	Low	Early	Low	Yes	No	Low-growing sand dune and riverbed shrub
Sedge	<i>Ficinia spiralis</i>	Pikao	No	No	No	Yes	No	Yes	Low	Early	Low	No	No	Foredune species useful as sand-binders
Dicot herb	<i>Euphorbia glauca</i>		No	No	No	Yes	No	Yes	Low	Early	Low			Foredune species useful as sand-binders
Tussock grass	<i>Poa billardierii</i>	Sand tussock	No	No	No	Yes	No	Yes	Low	Early	Low	No	No	Foredune species useful as sand-binders
Tussock grass	<i>Poa cita</i>	Silver tussock	Yes	No	Yes	Yes	Yes	Yes	Low	Early	Low	No	No	Tolerant ground cover species in coastal habitat
Grass	<i>Spinifex sericeus</i>	Spinifex	No	No	No	Yes	No	Yes	Low	Early	Low	No	No	Foredune species useful as sand-binders
Grass	<i>Poa astonii</i>		No	No	No	Yes	No	Yes	Low	Early	Low	No	No	Coastal ground cover species, tolerant of salt spray
Fern	<i>Asplenium lyallii</i>		No	No	No	Yes	No	Yes	Low	Later	High	No	No	Coastal ground cover species, tolerant of salt spray

Plant type	Species	Common name	Generalist	Wetland sites	Riparian sites	Dry sites	Moist sites	Exposure	Shade tolerance	Planting sequence	Palatability	Fleshy fruits?	Nectar sources	Notes
Dicot herb	<i>Disphyma australe</i>	Ice plant	Yes	No	No	Yes	No	Yes	Moderate	Later	High	No	Yes	Coastal ground cover species, tolerant of salt spray
Dicot herb	<i>Tetragonia implexicoma</i>	New Zealand spinach	No	No	No	Yes	No	Yes	Moderate	Early	Low	Yes	No	Coastal ground cover species, tolerant of salt spray