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March 31, 2021
File: 310003165

Attention: Robert Buxton
[SENT BY EMAIL]
robert@buxtonwalker.co.nz

Dear Robert,

Reference: Supplementary information – 20 Bay Road, Warrington (Council Ref: LUC-2020-293)

The New Zealand Motor and Caravan Association (NZMCA) has applied to Dunedin City Council (DCC) for resource consents to develop a new site at 20 Bay Road, Warrington for camping by NZMCA members.

The resource consent application was lodged on 1 July 2020. A request for further information (RFI) pursuant to s92 of the Resource Management Act 1991 (the RMA) was received dated 18 August 2020. A part response to the (RFI) was provided on 18 September 2020 and a second response provided on 5 November 2020. In my discussion with Connor Marner on Monday 16 November 2020, she indicated that the RFI was satisfied and that she would confirm by email that this would be taken off hold. No correspondence in this regard was received, however it is our understanding that the RFI of 18 August has been fully satisfied.

The next correspondence we received from Connor Marner came on Tuesday 15 December where she advised that the application would be re-allocated to a consultant planner due to workload. Several discussions with you followed, to ensure you were well versed in the material and discussions held to date.

To further assist with the continued processing of this application, this letter provides supplementary information in response to matters raised or ongoing since the application was re-allocated and includes:

- Clarification of earthwork activities
- Update on application for an archaeological authority
- Effects on Mana Whenua
- Effects on adjacent landowners
- Effects on the transport network

As previously mentioned, the initial RFI is considered to be satisfied and therefore this information is provided as supplementary information to the consent application.

1.0 Clarification of earthwork activities

Clarification of the proposed Stage One and Stage Two earthwork activities was provided in the second RFI response. However, further clarification is provided below with reference to the marked-up plan provided as **Attachment A** to this letter.

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STAGE ONE – North aisle (east-west direction) – area 760m²

Purple shaded area – 400m² area to be cleared of vegetation and infilled with soil, nominally 300mm (120m³ fill).

Yellow shaded area – Nominal 150mm topsoil over 760m² area (114m³ fill).

Compliance assessment:

The area of disturbance is only partly within the Rural Zone and Natural Coastal Character (NCC) overlay. No more than 200m² area and 50m³ volume of 'earthworks' is allowed in the NCC overlay in order to be considered 'small scale'.

Vegetation clearance is excluded from the definition of 'earthworks'.

Earthworks for landscaping or gardens is also excluded from the definition of 'earthworks'.

Based on the identified works and the definitions above, there will be no more than 200m² area and 50m³ volume of 'earthworks' undertaken within the NCC overlay and the earthworks are therefore deemed to be 'small-scale'.

STAGE ONE – Planting strip along the eastern side of the parking row for smaller vehicles

Area of approximately 120m² (60m x 2m)

- Strip the first 100mm of topsoil (cut 12m³)
- Place 150mm of topsoil for planting (fill 18m³)

STAGE ONE – Planting strip along the northern internal boundary with Kings College

Area of approximately 195m²

- Stripping of the first 100mm of topsoil (cut 20m³)
- Place 150mm of topsoil for planting (fill 29m³)

Compliance assessment:

The two planting strips are deemed to be excluded from the definition of 'earthworks' as the activity is for landscaping or gardens. Notwithstanding, these works are undertaken within the township and settlement zone and deemed 'small-scale'.

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STAGE TWO – Area of archaeological significance

We have identified the area of archaeological significance on the plan titled 'Stage 2 Pavement / Reinforced Grass' (see **Attachment A**) which has an area of 2050m² over which 'Pavement Type 2'¹ is proposed (Geogrid/Geofabric protection layer, sand, topsoil and grass). Stage 2 will not be used until the 'paving' treatment has been applied. Until that time, the area will be cordoned off from vehicular traffic by rocks, similar to what DCC have used at Warrington Domain. This will be communicated through NZMCA site information and enforced by local park custodians. The balance of the area including the area from the southern end of the driveway, circulation areas and parking rows, will remain undisturbed and grassed.

2.0 Update on archaeological authority

In their latest correspondence, Kāti Huirapa Runaka ki Puketeraki confirmed they do not support the granting of an Archaeological Authority for the proposed activity due to the area being of significance to Rūnaka with the subject site being located within two Dunedin City Council Wāhi Tūpuna mapped areas.

No formal comment has been made by the Rūnaka in response to the proposed mitigation measures to provide a protective barrier over the area identified in the archaeological assessment. Their latest letter, dated 2 March 2021, is provided as **Attachment B** of this letter.

3.0 Effects on Manawhenua

The Dunedin Second Generation District Plan (2GP) identifies Manawhenua as an affected party in relation to the visitor accommodation being a discretionary activity within the Rural Coastal zoned part of the site pursuant to Rule 16.4(3). It is noteworthy that the visitor accommodation is a restricted discretionary activity within the Residential zoned part of the site and therefore Manawhenua are not identified under the 2GP as an affected party over that part of the site.

In terms of Manawhenua being considered an affected party, an assessment of effects on cultural and historic values has been undertaken in Section 6.2 of the AEE prepared by Stantec dated 1 July 2020. Kāti Huirapa Runaka ki Puketeraki's position with regard to cultural effects has been further identified through consultation via Aukaha and a hui on site on Saturday 26 September 2020. The NZMCA has sought feedback on the mitigation proposed with regard to the heritage of the site. Feedback received from the four representatives during the hui was that generally they were supportive of the measures proposed to protect areas in situ that have been identified as being of archaeological significance.

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

¹ Pavement Type 2 (archaeological Significance) – Area is to have a geogrid / geofabric separation layer placed, followed by 100mm of coarse sand, and 200mm of topsoil then grass to be sown.

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In response, NZMCA has considered options for on-site wastewater storage and removal off-site or disposal on-site via dispersal fields. These options are still being investigated and may form part of NZMCA's long term plan for the site. NZMCA recently installed a 25,000L holding tank at a park in Christchurch with a telemetry system which notifies a local contractor when the tank needs emptying. The effectiveness of this system is being monitored before rolling it out to other parks. If successful, this could be an option for Warrington. An option like this at Warrington would be costly and would take time and careful planning to work through. As such, it is difficult for NZMCA to commit to installation of an on-site wastewater system at this stage in the consent process as the ability to use the site is uncertain.

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

The resource consent application currently proposes that members will utilise the existing dump station in the Warrington Domain, with plans to establish another dump station on the site at 20 Bay Road in the future. We understand use of the existing dump station in the Warrington Domain is still a concern for the Runaka as wastewater is conveyed from the dump station to the Warrington Wastewater Treatment Plant.

We note however, that in September, NZMCA received a copy of a report from DCC (refer Attachment A of the letter sent to Aukaha dated 12 October). Figure 1 of the report suggests the community can expect a significant reduction in the number of freedom campers visiting the domain over the next few years (due to border restrictions). A review of the Camping Control Bylaw 2015 was discussed at a DCC public meeting on Friday 31 January 2020. Meeting minutes identified a 36% reduction in the volume of freedom campers at Warrington over the 2018/2019 season due to other options being available to freedom campers that summer in Dunedin. NZMCA members also make up a proportion of the number of people in caravans and self-contained motor vehicles visiting the Warrington Domain.

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

In the most recent letter from Aukaha dated 12 October 2020 and 2 March 2021, the following values and threats were identified by the Runaka:

ID. 14 – Pūrākaunui to Hikaroroa to Huriawa

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

Values:

Pā Tawhito; Kāika; Urupā; Wāhi Tohu; Mauka; Mahika Kai; Wāhi Taoka; Archaeological Remains

Reference: Supplementary information – 20 Bay Road, Warrington (Council Ref: LUC-2020-293)

Threats:

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

ID. 15 – Okahau (Warrington)

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

Values:

Kāika; Kai Moana; Indigenous Vegetation; Wāhi Taoka; Mahika Kai; Archaeological Remains

Threats:

Earthworks; Subdivision; Natural Hazard Mitigation Activities

The proposal will result in limited visual effects where the only permanent structure proposed is the 10m² registration kiosk which is portable (i.e., does not require significant foundations/permanent ground disturbance). Visual effects on landscape and amenity values are assessed in Section 6.4.1 of the original consent application. As concluded in that assessment, the proposed activities will not be visible from the road or clearly visible from the public area to the east. Visibility of the activity from neighbours to the north (at 10 and 22 Bay Road) is also screened due to existing vegetation and/or the Kings High School building.

While aspects of the proposed activities will be visible from the neighbouring site at 28 Bay Road, they will not detract from views of the coast as these are understood to be obscured by the existing Kings High School activity and adjacent development, and therefore minimised.

Mitigation planting as indicated on the landscape concept plan as well as measures to minimise the development of the site (such as retaining the area in grass) will assist in the visual integration of the development into its rural coastal environment. The proposed camping activities will not be visually prominent beyond the immediate area and will not dominate or detract from views otherwise characterized by the natural landscape and surrounding residential activity. The proposal therefore will not adversely affect the visual integrity of the peaks and ridgelines.

Earthworks have been assessed above as being small-scale and the only consent trigger being that the area is within a heritage overlay requiring an archaeological authority. The soil is free draining with a sand base, and the site is largely dry throughout the peak camping season. The majority of the site will remain undisturbed and existing grass cover maintained. The extent of ground disturbance as described above is minimal and primarily for the clearance of noxious weed species, and replanting of species more appropriate to this environment.

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Stage One of the proposal seeks to avoid the area identified in the archaeological assessment as being of significant heritage value. The area was identified as being the most modified where the site was used historically for farming and therefore the lowered or reduced groundcover meant that there was an increased risk of unearthing artefacts. Stage Two will not commence until the proposed treatment has been undertaken to protect the ground *insitu*. Therefore, archaeological remains are not considered to be threatened but on the contrary are afforded protection by the steps and measures proposed by the applicant as part of the proposed use of the site.

For the reasons discussed above, the effects on manawhenua are assessed to be less than minor.

4.0 Effects on adjacent landowners

The maximum capacity of the site is proposed to not exceed 60 campervans/caravans, with less than half of this expected during quieter times of the year. The analysis of traffic generation for the camping ground indicates that it is likely to generate an average of 30-35 additional vehicle movements per day on the road network during off-peak periods and 100 movements per day on average during the summer peak period. Since the summer peak period represents about five weeks of the year, this represents an average daily traffic generation for the site measured over a year-long period of about 40 movements. This is equivalent to the expected average daily traffic generated by four to five residential properties. Peak hour volumes in the summer are expected to be in the range 15-20 movements or one movement every three to four minutes.

Overall, the proposed use of the site would be less occupied throughout most of the year than permanent residences. Vehicle movements would be comparable (depending on the density of development) and residential activity would likely generate greater vehicle movements during peak travel times. Any potential adverse effects resulting from the vehicle movements along the driveway are further mitigated by the large established trees which line and screen the driveway along the eastern boundary.

5.0 Effects on transport network

Effects on the transport network were discussed with DCC's transport planning team and Robert Buxton on the 2nd of March 2021 via teams. A summary of key points is provided below, and a revised set of proposed conditions are being worked through with DCC to reflect the agreed way forward.

We discussed DCC's concerns with the insufficient width of Bay Road, and that this may result in wearing of the sealed edge as well as safety concerns for pedestrians. We discussed the options of the applicant providing a gravel shoulder on the northern side of Bay Road (from the site up to the intersection with Hill Road) to mirror the same provision on the southern side.

After extensive discussion between the transport engineers, it was agreed that providing a gravel shoulder would appropriately balance the maintenance and safety concerns without requiring the applicant to widen the seal. The gravel shoulder was agreed to be visually appropriate in this rural environment and would mirror the existing gravel shoulder on the southern side of the road. We agreed that some flexibility should be provided in terms of width, being a minimum of 0.8m and desirably 1m, recognising that there are potentially a few variables in terms of topography and drainage along the shoulder and that we didn't expect it to be a perfect 1m. All attending also acknowledged the potential for speed increase in this environment if the road seal were to be widened and that the existing seal was appropriate to maintain the slow speed environment.

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We then discussed visibility and tracking over the centre-line at the Bay Road/Hill Road intersection. We discussed the hedge on the north-west corner of the intersection which restricts visibility. The DCC acknowledged that based on Chris's comments they agreed that turns could be made without conflict but all acknowledged that this intersection should be monitored. Chris and I both raised points about this intersection being an existing concern and noted that no safety audit was completed when the intersection priorities recently changed. The DCC acknowledged that the hedge was an issue for them to address, that it was outside the control of the NZMCA. Therefore, we proposed to draft a condition (aligned with Logans' recommendation in his memo) regarding monitoring of the intersection which would require the applicant to prepare a road safety audit with recommendations. The RSA would need to be prepared in consultation with a DCC counterpart. The DCC agreed that any recommendations from that RSA would be the responsibility of the DCC to respond to and/or implement any changes. This is acknowledging the issues which are existing and the mitigation being undertaken already by the applicant along Bay Road to widen the shoulder.

Based on the reasons and agreed way forward, effects on the transport network will be less than minor.

6.0 Conclusion

We trust that this information will enable the continued processing of the consent application and that a notification recommendation is forthcoming. Please contact me via email (kelly.bombay@stantec.com) or phone 03 341 4719 should you wish to discuss anything further.

Regards,

Stantec New Zealand



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Attachment A: Earthworks markup
Attachment B: Letter from Aukaha