

From: [Bombay, Kelly](#)
To: [Tania Richardson](#)
Cc: [Laura Mulder](#); [Resource Consent Submissions](#)
Subject: RE: Aukaha submission-LUC-2020-293
Date: Tuesday, 6 July 2021 08:33:09 a.m.
Attachments: [image004.png](#)
[20210705 - LUC-2020-293-J003734\(NZMCA\).docx](#)

Morena Tania,

Our thanks to Kāti Huirapa Rūnaka ki Puketeraki for taking the time to prepare this submission.

I've also copied in DCC to be sure they have also received this.

Nga mihi nui,

Kelly Bombay

BPlan

Senior Planner

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From: Tania Richardson <tania@aukaha.co.nz>
Sent: Tuesday, 6 July 2021 8:07 AM
To: Bombay, Kelly <Kelly.Bombay@stantec.com>
Subject: Aukaha submission-LUC-2020-293

Kia ora Kelly

See attached Aukaha submission on behalf of Kāti Huirapa Rūnaka ki Puketeraki.
Please email acknowledgement of receipt.

Kā mihi

Tania Richardson
Consents Officer – Mana Taiao Team

Telephone: (03) 477 0071

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268 Stuart Street, P O Box 446, Dunedin 9054



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05 July 2021

Dunedin City Council
PO Box 5045
DUNEDIN 9054

Tēnā koutou, ko tēnei mihi atu ki a koutou, kā mema o te komiti, kā kaiwhakawa o kā mea e pa ana tēnei kaupapa taumaha, me ki, o tātou nei rohe moana, he taoka o tātou nei whānau, hapū me te iwi. Ki a rātou kua whetu rakitia, te huka wairua, haere, moe mai, oki oki mai, kati.

RE: Resource Consent Application – New Zealand Motor Caravan Association

Resource Consent Application – LUC-2020-293

The establishment and operation of a members only caravan park - 20 Bay Road, Warrington

This is a submission on a limited notified resource consent application pursuant to section 95B of the Resource Management Act 1991.

Kāti Huirapa Rūnaka ki Puketeraki (the Rūnaka) **oppose** this application. The Rūnaka are not trade competitors for the purposes of section 308B of the Resource Management Act 1991 (RMA).

Kāti Huirapa Rūnaka ki Puketeraki **do not wish** to be heard in support of this submission at a hearing.

Kāti Huirapa Rūnaka ki Puketeraki seek that the application is **declined**, for the reasons set out below.

1. INTRODUCTION

- 1.1 The takiwā of Kāti Huirapa Rūnaka ki Puketeraki centres on Karitane and extends from the Waihemo River/Shag River to Purehurehu/north of Heywards Point. Kāti Huirapa Rūnaka ki Puketeraki share an area of interest in the inland roto and mauka with Kāi Tahu Papatipu Rūnaka within Otago, and with those Papatipu Rūnaka located beyond the boundaries of the Otago region.

Tino Rakatirataka recognised under the Kāi Tahu Settlement

1.2 The Ngāi Tahu Claims Settlement Act 1998 (Settlement Act) gives effect to the Deed of Settlement signed by the Crown and Te Rūnanga o Ngāi Tahu on 21 November 1997. The purpose of these documents was to:

- confirm the Treaty relationship, obligations and responsibilities between Kāi Tahu and the Crown;
- achieve a final settlement of Kāi Tahu historical claims against the Crown; and
- confirm Kāi Tahu tino rakatirataka. This includes an express acknowledgement (in both the Settlement Act and the earlier Deed) that:

“The Crown apologises to Ngāi Tahu for its past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries, and, in fulfilment of its Treaty obligations, the Crown recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui.”

1.3 The Deed of Settlement and Settlement Act also acknowledge the requirement for Kāi Tahu to express its traditional relationship with the natural environment and to exercise its kaitiaki responsibilities.

1.4 To acknowledge the association with the district and its resources, Māori words (underlined) are used within this document. See Appendix 1 for translations.

2. KAITIAKITAKA

2.1 The Rūnaka have responsibilities through whakapapa to act as kaitiaki and care for the environment as a whole. The right of Kāi Tahu to oversee land, resources, aspirations and wellbeing was protected under the Treaty of Waitangi, and this right still exists today, as recognised by the Ngāi Tahu Settlement

2.2 The Kāi Tahu ki Otago Natural Resource Management Plans 1995 and 2005 are the principal resource management planning documents for Kāi Tahu ki Otago and the embodiment of Kāi Tahu rakatirataka and kaitiakitaka. The kaupapa of the plans is ‘Ki Uta ki Tai’ (Mountains to the Sea), which reflects the holistic Kāi Tahu ki Otago philosophy of resource management.

- 2.3 The plans express Kāi Tahu ki Otago values, knowledge and perspectives on natural resource and environmental management issues. While the plans are first and foremost planning documents to assist Kāi Tahu ki Otago in carrying out their kaitiaki roles and responsibilities, they are also intended to assist others in understanding tākata whenua values and policy.
- 2.4 The 2005 Natural Resource Management Plan is divided into catchments, with specific provisions for the whole Otago area and each catchment. The current proposal is located within the Otago Harbour Catchment. The relevant objectives and policies of the 2005 Natural Resource Management Plan are attached to this submission as Appendix 2.
- 2.5 The Rūnaka are concerned about inappropriate development and earthworks in this significant cultural landscape (wāhi tūpuna) and archaeological site, as well as the additional pressure this development may cause on the Warrington Wastewater Treatment Plant. The Rūnaka are very concerned about the deterioration of inlet health and impacts on the mauri and life supporting capacity of the sea in the wider Otago Harbour Catchment.

3. SCOPE OF THE SUBMISSION

- 3.1 This submission relates to the application in its entirety.

4. KĀI TAHU RELATIONSHIP WITH THE CATCHMENT

- 4.1 Kāi Tahu has a cultural, spiritual, historic and traditional relationship with the Otago Harbour Catchment, of which Warrington is a part.
- 4.2 Te Tai o Arai Te Uru (Otago Coastal Marine Area) is a Statutory Acknowledgement Area under the Ngāi Tahu Claims Settlement Act 1998.
- 4.3 Kāi Tahu ki Otago used all areas of the Otago Harbour Catchment. Bays and inlets to the north of the Otago Harbour were popular sites for settlements. The bays, inlets and coastal area of the Otago Harbour Catchment sustained a rich fishing resource, from the continental shelf off Cape Saunders to Blueskin Bay. Blueskin Bay was also once a kohoaka for the right whale, although it is over 150 years since it has seen this activity. The rivers and streams within the catchment provide an important source of freshwater and sustain a range of fisheries including tuna and īnaka.

- 4.4 The landscape of the Otago Harbour Catchment evokes a cultural and spiritual meaning to takata whenua signified through layers of tradition, association and use, reinforced by place names that individually reflect a myriad of traditions, events, ancestors, site use, food or other resources and cultural perspectives. The landscape and associated place names are an integral element of an oral culture to recall and pass on to future generations a framework of values, beliefs and traditions that bind our people to the whenua and all of its resources. Many of the cultural landscapes have been modified or lost as a result of mismanagement and misappropriation of this taoka.
- 4.5 All water plays a significant role in our spiritual beliefs and cultural traditions, the condition of water is seen as a reflection of the health of Papatūānuku. The loss and degradation of this resource through contamination is a significant issue for Kāi Tahu ki Otago and is considered to have resulted in material and cultural deprivation.
- 4.6 Kāi Tahu had a very distinctive and unique culture and lifestyle in the southern half of the South Island, including permanent coastal settlements and seasonal migrations inland over often vast distances to harvest and collect food and resources. This practice is referred to as 'mahika kai' and became a corner stone of our culture. Mahika kai is the basis of culture and the unrelenting cultural imperative is to keep the mahika kai intact, to preserve its productivity and the diversity of species.
- 4.7 Mahika kai literally means "food works". It encompasses the ability to access the resource, the site where gathering occurs, the act of gathering and using resources and ensuring the good health of the resource for future generations. This is enshrined in the Kāi Tahu proverbial saying and tribal motto "mō tātou, a mō kā uri I muri ake nei – for us and for the generations that come after us."
- 4.8 The primary management principle for the Rūnaka is the maintenance and enhancement of the mauri or life-giving essence of a resource. Mauri is a critical element of the spiritual relationship of Kāi Tahu with the coastal area, recognising that all elements of the natural environment possess a life force, and all forms of life are related. The mauri of the coastal area represents the essence that binds the physical and spiritual elements of all things together, generating and upholding all life. Mauri can be tangibly represented in terms of elements of the physical health of the land, a river, or surrounding biodiversity. The forest, waters, the life supported by them, together with natural phenomena such as the mist, wind and rocks, possess a mauri or life-force. While there are also many intangible qualities associated with the spiritual presence of a resource, elements of physical health which Kā Rūnaka use to reflect the status of mauri and

to identify the enhancements needed include:

- Aesthetic qualities e.g. natural character and indigenous flora and fauna;
- Life supporting capacity and ecosystem robustness;
- Fitness for cultural usage

A resource's mauri is desecrated if it no longer supports the traditional uses and values. A water body or other natural resource can be desecrated by improper resource management activities. These may extinguish the mauri and in turn diminish the association upon which a range of values are based, including mahika kai, for the Rūnaka who hold traditional rights and responsibilities in respect to the resource.

- 4.9 Across the rohe, one of the principle indicators by which the Rūnaka assesses the mauri of a resource is its productivity and the food and other materials sourced from it. Hence the Rūnaka use the nature and extent of mahika kai as an environmental indicator. If the mauri of an entity is desecrated or defiled, the health and well-being of the resource itself, resource users and others depending on the resource are at risk. The Rūnaka understand that contamination affects the mauri of the water system. It is our right as rakatira, and our obligation as kaitiaki, to ensure that the mauri of the water comes first.

5. REASONS FOR THE DECISION SOUGHT

- 5.1 The application site falls within three Wāhi Tūpuna mapped areas according to the Dunedin City Council's Second Generation Plan (2GP). Wāhi Tūpuna areas are landscapes and places that hold particular cultural and ancestral significance for Kāi Tahu and our culture and traditions with our ancestral lands, water, sites, wāhi tapu, and other taoka.

- ID 14: Pūrākaunui to Hikaroroa to Huriawa. Values to be protected include Pā Tawhito; Kāika; Urupā; Wāhi tohu; Mauka; Mahika kai; Wāhi taoka; and Archaeological remains. Principle threats to values include 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; and earthworks.
- ID 15: Okahau (Warrington). Values to be protected include Kāika; Kai Moana; Indigenous vegetation; Wāhi taoka; Mahika kai; and Archaeological remains. Principles threats to values include earthworks; subdivision; and natural hazard mitigation activities.
- ID 16: Blueskin Bay. Values to be protected include Kāika; Mahika kai; Wāhi mahi kohātu; Ara tawhito; and Archaeological remains. Principle threats to values include

earthworks; activities affecting water quality, including sediment discharge; natural erosion; activities that affect access to the water body, including buildings, structures and public amenities close to it; and natural hazard mitigation activities.

5.2 The application site is of high cultural value and was a place of significant Kāi Tahu activity. This is proven by the presence of archaeological sites such as 'Warrington moa hunting site' (NZAA Reference I44/177) and a midden/occupation layer with artefacts (NZAA Reference I44/178). A pounamu working site, kāik and pā site are all present at the application site. Archaeological material has been observed exposed at the surface on the site.

5.3 Other archaeological sites near the application site, according to NZAA maps, include:

- I44/200 – Exposed shell middens, consisting mostly of pipi, exposed in several patches over roughly 60 by 30 m of sand dunes. Other shell includes cockle, mudsnail and paua. Stone flakes were also recorded.
- I44/194 – Middens
- I44/180 – A midden of exposed shells (mainly pipi) in a black sand layer.
- I44/179 – Recorded in 1983 as an oven in section eroding from a low clay bank on estuary edge. The oven contained heat shattered stones and charcoal.
- I44/125 – Terrace/midden
- I44/201 – A shall midden exposed in small isolated patches in 7cm of grey soil on clay. Some fish bone and oven stones were recorded as well. Some of the shell in the area was reported as looking modern.)

5.4 Warrington is intersected by the historic Otago Coastal Trail, a traditional travel route from Canterbury to Otago.

5.5 Kāti Huirapa Rūnaka ki Puketeraki are concerned this development has the potential to damage this important cultural and historical site. Archaeological artefacts may be disturbed by activities such as earthworks or traversing vehicles.

5.6 Kāti Huirapa Rūnaka ki Puketeraki do not support NZMCA members camping at the proposed park utilising the existing wastewater dump station in Warrington Domain, from which wastewater is conveyed to the Warrington Wastewater Treatment Plant. The Rūnaka are concerned that the Warrington Wastewater Treatment Plant is already under pressure and is not fit for purpose in terms of capacity and discharge quality. For example, the plant has failed to comply with nitrogen limits set in its resource consent from the Otago Regional Council (Ref:

2006.861) on multiple occasions since 2015.

- 5.7 The increased volume of sewage that would be incurred from the proposed campground will put the Wastewater Treatment Plant under added pressure, furthering the potential of wastewater discharge limit exceedances to Papatūānuku and ultimately to Tangaroa.
- 5.8 The application notes that the site is likely to operate at full capacity during peak periods which are typically the main summer months, indicating that at these times in particular there will be extreme pressure put on the Warrington Wastewater Treatment Plant. Furthermore, the NZMCA members camping at the proposed park will be in addition to freedom campers at Warrington Domain who also use the dumping station there.
- 5.9 Treated wastewater from the Warrington Wastewater Treatment Plant is sprayed onto a designated part of the reserve at Warrington spit, next to Blueskin Bay. Thus, there is potential for contaminants from wastewater to enter the ocean. Such contamination will degrade the mauri of the water.
- 5.10 The Rūnaka do not believe that speculated upgrades to the Warrington Wastewater Treatment Plant are sufficient mitigation, because these upgrades are unlikely to occur for several years.
- 5.11 Kāi Tahu ki Otago Natural Resource Management Plan 2005 objectives and policies provide guidance to decision-makers working within the context of the *Resource Management Act 1991 (RMA)*. Notable issues identified in the plan include the building of structures and activities in significant landscapes; poorly designed or inadequate coastal sewerage infrastructure; and deterioration of inlet health and impacts on the mauri and life supporting capacity of the sea. The Rūnaka consider that the application would exacerbate these issues in the Otago Harbour Catchment. Further issues, objectives and policies that are relevant to this application have been identified in *Appendix 2*.
- 5.12 Section 7 of the RMA requires consent authorities to have ‘particular regard’ to kaitiakitaka in a manner that respects and accounts for tikaka unique to each iwi exercising kaitiakitaka within their rohe. In full view of the rakatirataka and tikaka embedded in kaitiakitaka, the application significantly affects, and is inconsistent with, the kaitiakitaka role and duties held by Kā Rūnaka.

6. DECISION SOUGHT

6.1 Kāi Tahu submits that the application, as applied for, should **be declined**.

6.2 Kāi Tahu recommend that the proposal should be put on hold until a review of the Warrington Wastewater Treatment Plant has been undertaken.

E noho ora mai

Address for Service:

Tania Richardson

Consents Officer

Aukaha

PO Box 446

Dunedin 9054

Phone: (03) 477 0071

E-mail: tania@aukaha.co.nz

Appendix: 1
Glossary

Appendix 1: Glossary

Āhuataka	Appearance
Ara	Trail
Ara tawhito	Ancient trails
Arai Te Uru	Otago coastline
Awa	River, stream, creek
Hapū	Sub-tribe
Hukawai	Meltwater
Hukuwai	Type of water
Īnaka	A variety of whitebait; also a variety of pounamu
Iwi	Tribe
Ka Tiritiri o te Moana	Southern Alps
Kai	Food
Kāika/kaik	Settlement
Kāi Tahu	Descendants of Tahu, the tribe
Kāi Tahu Whanui	the collective of the individuals who descend from one or more of the five primary hapū of Hawea, Rapuwai, Waitaha, Kāti Mamoe and Kāi Tahu
Kaitiaki/Kaitiakitaka	Guardian / to exercise guardianship
Kaupapa	Customs or Protocols
Ki uta ki tai	Mountains to the Sea
Kō	a tool similar to a spade
Kohoaka	Breeding ground
Mahika kai	Places where food is produced or procured.
Mana Whenua	Customary authority or rakātirataka exercised by an iwi or hapū in an identified area.
Manawhenua	Those who exercise customary authority or rakatirataka
Mātauraka	Knowledge, wisdom, understanding, skill
Mauka	Mountain
Mauri	Essential life force or principle, a metaphysical quality inherent in all things both animate and inanimate
Murihiku	That area south of the Waitaki River
Ngahere	Forest/bush
Ngā Rūnanga/Rūnaka	Local representative group of Otago
Noa	Use
Nohoaka	Occupation sites
Pā	Fortification
Papatipu Rūnaka	Traditional Kāi Tahu Rūnaka
Papatūānuku	Earth Mother
Pounamu	Nephrite, greenstone, jade
Pūrākau	Stories
Rakatira	High ranking, chiefly
Rakātirataka	Chieftianship, decision-making rights
Rakinui	God of the Sky
Rohe	Territory, boundary
Roto	Lake

Takiwā	Area, region, district
Tākata whenua	Iwi or hapu that holds mana whenua (customary authority) in a particular area
Tangaroa	Deity of the sea
Taoka	Treasure
Te Mana o te Wai	Concept for fresh water that encompasses the mauri of a water body
Tikaka	The customary system of values and practices that have developed over time and are deeply embedded in the Māori social context
Tino Rakatirataka	Self-determination, autonomy, self-government
Tōpuni	Areas which are confirmation and recognition of Ngāi Tahu mana and rakātirataka over certain land managed by the Department of Conservation. Tōpuni apply to some of the most prominent landscape features and conservation areas in Otago.
Tuna	Eel
Tupuna	Ancestor
Tūpuna	Ancestors
Urupā	Burial place
Wāhi Tapu	Places sacred to takata whenua
Wāhi Taoka	Resources, places and sites treasured by Manawhenua
Wāhi Tūpuna	Landscapes and places that embody the relationship of manawhenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taoka
Wai Māori	Fresh water
Whakapapa	Genealogy
Whānau	Family

Appendix: 2

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

Kāi Tahu ki Otago Natural Resource Management Plan 2005

Otago Region / Te Rohe o Otago

Cultural Landscapes

Cultural Landscapes General Issues

- Land management regimes have failed to adequately provide for Kāi Tahu ki Otago interests in cultural landscapes.
- Impact of intensified land use on cultural landscapes.
- Extension and maintenance of infrastructure (e.g. transport, telecommunications) can effect cultural landscapes.
- The building of structures and activities in significant landscapes.

Cultural Landscapes Objectives

- The relationship that Kāi Tahu ki Otago have with land is recognized in all resource management activities and decisions.
- The protection of significant cultural landscapes from inappropriate use and development.
- The cultural landscape that reflects the long association of Kāi Tahu ki Otago resource use with in the Otago region is maintained and enhanced.

Cultural Landscapes General Policies

- To promote the control of visitor and recreational activities that impact on significant landscapes.

Earth Disturbance

- To require all earthworks, excavation, filling or the disposal of excavated material to:
 - Avoid adverse impacts on significant natural landforms and areas of indigenous vegetation;
 - Avoid, remedy, or mitigate soil instability, and accelerated erosion;
 - Mitigate all adverse effects.

Roading

- To require an accidental discovery protocol for all road realignments and widening and forest harvest roads and to avoid any sediment run-off during earthworks and road construction to avoid contamination of waterways.
- To require indigenous re-vegetation with locally sourced species for all disturbed areas. Re-vegetation should be monitored by an assessment of the vegetative cover at one growing season after establishment and again at three seasons from establishment.

Structures

- To discourage the erection of structures, both temporary and permanent, in culturally significant landscapes, lakes, rivers or the coastal environment.

Tourist Operations

- To require commercial operators to consult with Kā Papatipu Rūnaka, and obtain agreement about any historical, spiritual or cultural information relating to takata whenua and to ensure any information used is both appropriate and accurate.
- To encourage that adequate provision is made for the storage and collection of litter and refuse, and disposal is in an approved manner.
- To require land based tourist entities provide a pamphlet (including a map) with information and instruction on the following:

- Location of toilets
- Stipulation that fires should only be lit in designated places
- Request that visitors use only the marked tracks
- Explanation of the vulnerability of existing flora and fauna and that vegetation should not be disturbed or removed,
- And, if considered appropriate by Kā Papatipu Rūnaka, the cultural importance of particular sites.
- To require all liquid waste products (wastewater, effluent and bilge water) to be disposed of to appropriate sewer reticulation system.
- To encourage the establishment of maximum visitor numbers to sensitive areas.

Mahika Kai and Biodiversity

Mahika Kai and Biodiversity General Issues

- Point and non-point source discharges impacting on mahika kai.
- Human waste disposal to mahika kai areas.
- Poorly managed landfills, industrial sites and waste disposal have created contaminated soils.

Mahika Kai and Biodiversity Objectives

- Mahika kai resources are healthy and abundant within the Otago Region.
- Mahika kai is protected and managed in accordance with Kāi Tahu ki Otago tikaka.

Mahika Kai and Biodiversity General Policies

- To require that hazardous operations and the use, transportation and storage of hazardous substances are not to impact mahika kai and other cultural values.

Coastal Environment

Taku Tai Moana Me Wai Māori Issues

- Land use activities adjoining the coast adversely affect localized coastal water quality, for example from devegetation and poor riparian management.

Discharge and Waste

- Point source sewage discharges.
- Poorly designed or inadequate coastal sewerage infrastructure.
- Stormwater discharges e.g. from urban roads containing contaminants such as oil, carbon particles.
- Indiscriminate dumping of rubbish in the coastal environment.
- Tourism-associated waste, including chemically treated sewage, from campervans and freedom campers.

Taku Tai Moana Me Wai Māori Objectives

- The spiritual and cultural significance of taku tai moana me te wai māori is recognised in all management of the coastal environment.
- Te Tai o Arai Te Uru is healthy and supports Kāi Tahu ki Otago customs.
- There is no direct discharge of human waste to Te Tai o Arai Te Uru and other contaminants being discharged directly or indirectly to the coastal environment are remedied.

Taku Tai Moana Me Wai Māori Policies

- To encourage integrated management of the coastal environment.
- To encourage any land use activity adjacent to the coastal environment to avoid to mitigate any adverse effects on coastal water quality. For example set back distances for effluent spraying and protection of coastal margins.

Discharges

- To oppose the discharge of sewage and industrial effluent directly to the coastal environment.
- To require that leachate from disposal sites adjacent to coastal environments is monitored and contaminated environments rehabilitated.
- To require better monitoring and consent condition compliance for septic tank systems in the coastal environment.
- To encourage investigations and improvements to existing coastal sewage infrastructure.
- To encourage the retention of waters within catchments to reduce runoff to the coastal environment.
- To encourage the development of a network of disposal sites along the coast for campervan and other tourism-associated waste disposal.
- To require campervan rental agencies to educate clients on the appropriate disposal of rubbish and effluent.
- To oppose camping near culturally sensitive sites.

Cultural Landscapes Issues

- Tourism activities and infrastructure
- The cumulative effect of incremental, unco-ordinated land use change and building within the coastal environment.

Cultural Landscapes Objectives

- To recognise and protect the cultural integrity of coastal land and seascapes

Cultural Landscapes Policies

- To protect the coastal environment from encroachment of the built environment
- To require that buildings and developments within the coastal environment are to be in sympathy with the cultural landscapes.
- To encourage rubbish/litter management strategies especially in high public use areas.

Otago Harbour Catchment

Wai Māori and Wai Tai Issues in the Otago Harbour Catchment

- Deterioration of inlet health and impacts on the mauri and life supporting capacity of the sea.
- Point source discharge of wastewater and other contaminants into the Otago Harbour.

Cultural Landscapes Issues in the Otago Harbour Catchment

- Impact of tourism on roading and waste management

Cultural Landscapes Policies in the Otago Harbour Catchment

- To protect important landscapes, landforms and features of significance from inappropriate activities such as mining and earthworks, subdivision, roading, and telecommunications

From: [REDACTED]
To: [Resource Consent Submissions](#)
Subject: Submission LUC-2020-293
Date: Monday, 5 July 2021 11:13:01 a.m.
Attachments: [LUC-2020-293 NZMCA campground 24 Bay Road Submission.docx](#)

Kia ora koutou,

Please find attached our submission for the resource consent LUC-2020-293.

Please respond by return email to confirm you have received this submission.

Ngā mihi

Louise Marsh and Quenton Johnston

Quenton Johnston and Louise Marsh

05 July 2021

City Planning
Dunedin City Council
PO Box 5045
Moray Place
Dunedin 9058

Dear Sir/Madam,

As affected persons we, Quenton Johnston and Louise Marsh, **oppose** the proposed resource consent application for a caravan park at 20 Bay Road, Warrington (LUC-2020-293).

Proposal

The application is: The establishment and operation of a members only motor caravan park at 20 Bay Road in Warrington, with provision for up to 60 self-contained vehicles or caravans per night.

The proposal is to access this property by a gravel compacted road that runs along our western boundary (24 Bay Road) and would be approximately 12m from our living area. Below is a summary of our concerns based on our initial reading of the documents, which we do not believe have been appropriately considered or quantified in this application.

This submission is based on the application information provided at the below link, and the s95 notification assessment prepared by Council's Consultant Processing Planner, Robert Buxton.

<https://www.dunedin.govt.nz/services/resource-consents/notified-resource-consents/notified-resource-consents/non-notified-applications/LUC-2020-293>

As part of the processing planners Section 95 notification decision the following comments were provided:

"However, due to the nature of the traffic from the proposal (being generally larger vehicles, including some towed vehicles, compared to the usual traffic associated with residential activity), and that there is no permitted baseline for how much residential activity can occur on the site, I consider the adverse effect on the amenity for these persons will not be less than minor. The traffic generated may also be greatest during the summer months when the residents adjoining the driveway can be expected to be enjoying their outdoor areas more."

Adverse effects:

We believe that the proposal will result in significant adverse effects on our day to day living in relation to the following affects:

- Nuisance effects (including noise and light pollution from vehicles)
- Transport Safety
- Residential Coherence
- Cumulative Effects

We address these effects below:

Nuisance Effects - Noise and Light Pollution

- RMA Part 3 Noise – 16 Duty to avoid unreasonable noise: based off the NZMCA submission 75dBA at 7m from vehicles is likely, at 12m (distance from tyre to our living area) to be expected to be 70dBA. All 4 property owners along this access way would be likely exposed to greater than noise requirements of 50Dt/40Nt dBA (2GP). During peak times (summer) the frequency has been quoted to be up to 15 to 18 vehicle movements per hour (one every 4 to 3 minutes). As research suggests, this level of noise pollution would have a significant impact on our health, wellbeing and day to day living.
- The photo below illustrates the closeness of our living room at 24 Bay Road (on left of photo below) to the access to the proposed camp ground at 20 Bay Road:



- Light pollution from extra vehicles entering the access road from the west end of Bay Road. The path of this light would travel across the front of our house, including our bedrooms, impacting on our quality of life.
- Additionally, Emissions from up to 18 vehicles traveling 12m from our living space per hour would create a significant hazardous substance exposure.
- Dust from a significant increase in large, unfamiliar vehicles will also generate significant nuisance effects on our immediate outdoor living space of our property.
- It is stated that there will be a gate 13m in from Bay Road. This will mean that vehicles will drive in, stop, open gate, drive through, stop, shut gate, and drive on. All increasing engine noise, as well as additional noise pollution from people talking, music etc from the vehicle.

Given the above, we believe that use of the existing access for this level of activity is inappropriate given the access adjoins a number of residential properties (including ours).

Transport Safety

- In the peak season the applicant states that there will be 98-102 vehicle movement per day (VMD) along Bay Road (off peak season 33-34 VMD), which is approximately 4.5m wide at point of entry to the access way. To pass a vehicle coming in the opposite direction, the applicants have reported that this would require the vehicles to use the foot path to safely pass. As there is no separation between the road and the footpaths along Bay Road, this is a significantly safety impact to pedestrians using the footpath. The footpath is used frequently for children getting to and from school, people walking dogs, and horses being led or ridden.
- The application states traffic will follow existing signage to the DCC freedom camping area and will enter Bay Road from the east end. However, Google maps directs traffic by the west end which has a tight radius 90-degree blind left turn which is not safely negotiable for large campers or towing vehicles.
- The NZMCA propose widening the section of Bay Road from the access to 20 Bay Road to Hill Road by 0.8-1.0m. This is proposed to be gravel which would make it difficult for people to distinguish if this is part of the road or is a footpath given that our footpaths are also gravel. This could create further safety issues. There will also be significant disturbance to neighbours during construction.
- To access the dumping station, vehicles will need to travel back down Bay Road and down to the DCC camp area, before retracing their tracks back out of Warrington. This will increase traffic for other residents who have not been notified.
- On Mondays when rubbish and recycling is collected, every household places their bins at the kerbside for collection, as required by the DCC. This leaves very limited room for additional vehicles and creates a safety issue as shown by the photo below taken outside 26 Bay Road:



Residential Coherence:

- o There are an estimated 220 households in the Warrington community. An increase of 60 mobile homes per night at this proposed site would represent a 27% increase in households, in turn, creating a number of issues. The photo below illustrates the impact from the NZMCA camp ground that was run in the same location previously. This photo was taken from 28 Bay Road and illustrates the negative visual impact of the proposed camp ground.



- The proposal will significantly increase the transient population, who have no connection to the Warrington community. This generates privacy and safety issues to all residents of Warrington, and in particular those residing in close proximity to the proposed site. This also undermines the residential coherence values within the Warrington Community.
- There will be a greater demand on the already non-compliant wastewater system in Warrington through use of the existing dumping station. This has been reported in the media recently: <https://www.odt.co.nz/news/dunedin/limits-breached-upgrade-two-years-away>
- There will also be an increase noise associated with a potentially large number of people at the camping ground, and the use of generators by these people.
- Increased fire risk. The NZMCA have not provided for water storage tanks for the purpose of fighting fires, as new residents of the area are required to do. The Blueskin Bay area is serviced by volunteer fire brigade located in Waitati, 6km away. Once the volunteers have arrived at the Waitati fire station, it then takes 8 minutes to drive to Warrington, by this stage fires are well ablaze. We have had a few fires in Warrington over the last few years which is very scary for those of us who live nearby. Here are some recent media articles regarding fires in Warrington:
 - <https://www.odt.co.nz/news/dunedin/warrington-beach-fire-suspicious>
 - <https://www.odt.co.nz/news/dunedin/warrington-fires-burn-house-destroy-shed>
 - <https://www.odt.co.nz/news/dunedin/fire-near-warrington-sea-lion-colony-extinguished>

- Impact of additional people on the Warrington area including:
 - The sensitive ecosystem e.g. the migratory birds like Banded Dotterel.
 - Increase in people on the walking tracks which are not maintained.
 - The Sea Lion who has her pup in the estuary near the proposed site every year.
 - The increase in the number of dogs in the area staying with the campers. DOC restricts dogs on the beach in the summer due to the birds. This will mean an even greater concentration of dogs in a smaller area.

Permitted Baseline:

- Page 14 of the Processing Planner's S95 Notification Assessment notes that 'there is no permitted baseline for how much residential activity can occur on site'. On this basis, it is considered that the proposed estimated 98-102 VPD from 60 vehicles as outlined in the Applicant's AEE are not considered to be anticipated within the subject site and will therefore generate significant adverse effects on our day to day living, particularly where 12 unfamiliar, large vehicles per hour will access the site immediately beside our property.
- Given the above, we believe the application generates significant adverse effects in relation to the residential coherence as it relates to the Warrington Community. The proposal represents a significant increase to unfamiliar visitors arriving in unusual and unfamiliar, large vehicles with up to a predicted 102 VPD which is not anticipated within the surrounding environment. We therefore believe there are significant adverse effects in relation to residential coherence and character and amenity values on our property and surrounding properties.

Cumulative Effects:

- There is an existing freedom camping site at the Warrington Domain to the east of the subject site which is managed by the DCC. This provides a large freedom camping area located within 30m of the proposed campground. We believe there is no need for an additional camping ground in this small community, and that there are no positive benefits for the community.
- Overall, it is considered that the cumulative effects associated with two separate camp ground premises within proximity of the surrounding residential environment will have significant cumulative effects particularly in relation to the significant increase in movements of large, unfamiliar vehicles, through a low density and quiet residential township.
- Having spoken to some NZMCA members they believe it is inappropriate that a campground be located within close proximity of an existing campground and to a residential area – they would be happy to use the existing DCC camp ground.

Conclusion:

Overall, we believe there will be significant effects on our day to day living at our property at 24 Bay Road as a result of the proposed activity.

These effects include a number of nuisance effects in relation to noise and light pollution from large, unfamiliar vehicles entering and exiting the site from the vehicle access which immediately adjoins our boundary and outdoor living space. We believe these effects are well beyond what can be anticipated within a residential area. We believe the proposed access location is inappropriate on this basis and will significantly undermine our residential amenity and coherence. The proposal will ultimately result in a significant increase of unfamiliar, large vehicle movements that are not anticipated in the zone and will generate inappropriate nuisance, transport, and safety effects.

We also believe that there are significant cumulative effects, particularly with respect to the existing DCC Campground located within the Warrington Domain which adjoins the subject site to the east.

If Consent is Granted

Overall, we seek to oppose this application through our submission. However, in the scenario that Council grants the resource consent, we seek the following relief:

1. We request that the proposed caravan access location off Bay Road be relocated to the existing access track through the Warrington Domain off Esplanade Road, as indicated on the map below.
2. If the proposed access is used, that the access road surface is of a surface which minimises noise (i.e. sealed).
3. The overall number of motor caravan parks is reduced to a more acceptable degree, with respect to transport and nuisance effects and residential coherence.



These concerns are supported by the owners of the property at 28 Bay Road and at least two properties along Bay Road. We believe that the persons at 28 Bay Road and those that live along the propose path traffic travel are directly affected and should be notified based on the above summary.

We wish to be heard on our submission.

Kind regards,

Quenton Johnston and Louise Marsh

Phone: [REDACTED]

Phone: [REDACTED]

Email: [REDACTED]



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kaupihara
a-rohe o
Ōtepoti

SUBMISSION FORM 13

Submission concerning resource consent on limited notified application under section 95B, Resource Management Act 1991

To: Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

Resource Consent Number:

LUC-2020-293

Applicant: New Zealand Motor Caravan Association

Site Address:

20 Bay Road

Description of Proposal:

Establishment and operation of a members only motor caravan park

☒ We wish to lodge a submission on the above resource consent application (please read privacy statement):

Your Full Name:

Kevin Jack Muschamp, Prudence Morna Muschamp, Tye Muschamp, Jessica Muschamp

Postal Address:

[Redacted]

Post Code: 9069

Telephone:

[Redacted]

Email Address:

[Redacted]

I wish the following to be used as the address for service (choose one): ☒ email ☐ post ☐ other:

I would like my contact details to be withheld: Yes ☐ No ☒ (tick one)

☒ I Am Not (delete one) a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

Trade competitors only:

I Am/Am Not (delete one) directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

Note: If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

☒ Support/Neutral/Oppose this Application (choose one) oppose

The specific parts of the application that this submission relates to are [give details]:

The use of this adjoining land to our property should not be used for any purpose other than residential development.

2) The noise, light, dust and toxic fumes likely to be generated by this applied for activity are unacceptable to us

3) The impact of a concentrated group of people on the estuary coastline's native flora

Please attach other pages as required

— continued on page 3

☒ Our submission is [include the reasons for your views]:

The current provisions for campers (tents, campervans, caravans and other assorted vehicles eg large trailer homes, 5th wheels, converted buses and ambulances etc) within Warrington village is quite sufficient, NZMCA members can make use of the Warrington Domain camping facilities including the waste dump site as of right at no current cost to them. We believe this application would result in an overdevelopment of this type of activity within our small coastal village.

continued on page 4

Please attach other pages as required

I seek the following decision from the Council [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

that the Council does not give consent to this application in its current form and that if the NZMCA wish to pursue it that the wider Warrington residents are included as possibly affected and able to be involved in any future decision making process issues that we would be interested in are ① number of vehicles ② traffic, specifically option 1+2 ③ Environmental factors, vegetation ④ waste disposal

Please attach other pages as required

Note: If you have a right of appeal under section 120 of the Resource Management Act 1991, you may appeal only respect of a matter raised in your submission (excluding any part of the submission that is struck out).

I, Do/We wish to be heard in support of this submission at a hearing (delete one)

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Yes ☒ No ☐ (tick one)

I request, pursuant to section 100A of the Resource Management Act 1991, that you delegate your functions, powers, and duties required to hear and decide the application to 1 or more hearings commissioners who are not members of the Council

Yes ☐ No ☐ (tick one)

Note: If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

Signature of submitter:

(or person authorised to sign on behalf of submitter)

Date: 4th July 2021

Notes to Submitter:

Closing Date: The closing date for serving submissions on the Dunedin City Council is **Monday, 05 July 2021 at midnight**. A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Dunedin City Council. The applicant's address for service is **New Zealand Motor Caravan Association, C/O Kelly Bombay, Stantec, PO Box 13052, Armagh, Christchurch 8141** or kelly.bombay@stantec.com

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to resconsent.submission@dcc.govt.nz

Privacy: Please note that submissions are public. Your name, contact details and submission will be included in papers that are available to the media and the public, including publication on the Council website. You may request your contact details be withheld. Your submission will only be used for the purpose of the limited notified resource consent process.

Strike Out: Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

- 4) The impact of the traffic implications on Warrington's ³ residents, our neighbours and ourselves is detrimental to the peace, ^{safety} and tranquility that attracted us to settle here in Warrington.
- 5) The Warrington Waste water treatment plant is not seen as fit for purpose, this application would put the treatment plant under pressure and given that there are residential developments currently in Warrington we would have serious concerns re the increased risk of contaminating our coastal and estuary environment.
- 6) We don't agree that this proposed activity will have a positive affect for Warrington village.
- 7) we don't agree that the proposed activities can be managed so they are no more than minor

2) This activity will result in an annoyance factor imposed on the adjoining neighbours, the arrival of vehicles, some of them very large, navigating their way through the entrance (lights on if its dark), stopping and idling their engine right beside 16 Bay Road (approx 10-15 mtrs from the house), opening the gate, accelerating through the gate, stopping and idling the engine again while the gate is closed and then accelerating away past 3 more residential properties, we note there is provision for another gateway "if required" not far from our boundary resulting in a repeat of the whole opening and closing of gates procedure, over one public holiday ~~with~~ weekend we could be subjected to up to 240 of these arrivals and departures with their associated light disturbance, engine noise, dust from the gravel road and toxic fumes from petrol and diesel engines, As supporters of a clean green environment we have concerns that the NZMCA's members would be one of the last groups to make the transition to electric.

- we note that the use of generators is proposed to be limited to between the hours of 8am to 8pm, we do not want this monotonous annoying consistent noise interfering with our ability to hear and enjoy nature eg surf on the beach, birdlife
- we are concerned that at anytime the noise generated by upto 120 persons would represent considerably more than what we would expect from any residential development of that property, this group constrained within this area is approx 25% of the entire Warrington households

3) We are concerned that the estuary coastline is currently at risk from foot traffic ie damage to native ground cover, wetlands etc. Given that this proposed activity adjoins direct access onto the estuary we are concerned that the increased foot traffic generated from 60 camping units will dramatically accelerate the destruction of plant life and interfere with exposed midden + other archaeological sites

- 4) We believe all residents along the proposed route through the village that NZMCA members would take to arrive at this proposed camping area should have been included as people affected by this proposal

2.2.1 of the application - Local Transport Network

there is no reference to this applications impact on residents.

3.4 Current bus volumes of traffic now reflects exactly what Warrington is re a residential village, this is not a reason to considerably increase the no of and size of vehicles winding their way through the streets of Warrington.

* We note that the access option report was completed by Carriageway Consulting in Sept 2019 Option 1 being preferred, we note that this application is for option 2 that subjects an extra 20 residential units to the traffic implications of its operation.

- 5) It is our understanding that Kati Huirapa Runakau ki Puketaraki have serious concerns re the increased risk to the Warrington Treatment station. We are of the view that despite assurances from NZMCA that members will discharge effluent into the Warrington dump site.

* Current residential development within the village is perhaps more than what the Treatment station can cope with.

- 6) We do not see any real benefits for the Warrington community from this applied for activity, we will not enjoy any sense of community from these visitors who would undoubtedly enjoy our environment and leave, Warrington has no commercial interest in them, the closest business which could attract

6) cont - their patronage is the Arc Brewery located ⁶ out of the village on state Highway one.

7) We note that at no time were we approached by NZMCA and that their initial attempts to establish this activity was through a non notified basis, we do not agree that the adverse effects have been adequately avoided, remedied or mitigated to be overall less than minor, we note that while it is stated that traffic generated by this proposed activity does not pass by any schools, daycare centres etc it does pass within 10 meters of the Kings High school classroom by the sea, at times there are 15 high school students in residence for periods of 24hrs x 5 days.

Re - NZ Coastal Policy statement 2016

- Otago Regional Policy statement
- Proposed 2nd Generation District Plan
- Operative District Plan

we do not agree with the above statements and Plans that this applicant is consistent re meeting the standard of the reasonable and appropriate change of use from residential to camping ground.

From: Richard Hatherly

Subject: 20 Bay Road NZMCA RCA

Date: 5/07/2021 at 1:33:00 PM

To:

Dear Planners

In the matter of LUC-2020-293, I have received a copy of NZMCA's RCA, and I write in support of that application, which I read and found to be comprehensive, informative, and which assuaged any and all misgivings I may have had over NZMCA's proposal.

I bought the property in 1985, and that same year, commissioned local archeologist Brian Allingham to assess the site and report on my responsibilities during my tenure, and the steps I should take to ensure that the historical integrity of the land was not compromised by any of my actions.

Latterly, and despite my specific instructions to the contrary, the undulating site was levelled on the instruction of Alan Gramstrup (CEO Delta), in pursuit of a contract for Delta to subdivide the property. The pre-European Maori occupational site was destroyed, and the pre 1900 European tip -site was compromised. To assess this civic vandalism, and to formulate a path forward that respected the Whenua, I commissioned a second report, this time from (then) Associate Prof Richard Walters and (the late) Dr Chris Jacomb, ex-Historic Places Trust Otago Head. I understand you are in receipt of that report. Prof Walters and Dr Jacomb told me the remnants of pre-European Maori occupation were encased in sand, which protected those remnants from further damage, and that motor vehicles driving on that sand would not contribute significantly to further degradation. The European tip-site was subject to the same favourable condition.

After considering options, I abandoned plans to develop the land, and when NZMCA made an offer to buy the property, my due diligence demonstrated that overnight usage of the property by NZMCA members would have the least developmental effect on the property. As part of that due diligence, I invited NZMCA members to park and stay onsite, at no cost, and so was not a commercial operation, and I monitored the effect of their presence on the site to gauge any detrimental effects. In my opinion, there were none. Despite a number of vehicles using the site, not a cigarette butt, not a matchstick, no trash, no faecal matter or toilet paper, no sign of occupation once they had left. That is in striking contrast to the previous 30+ years of locals using and trashing my property.

I have been a Warrington fan since 1969. I have removed broken glass and trash from the beach and Domain for over 50 years. I have planted native flora over the

5/7/21 

Warrington Sandspit and Domain, and I have done my best to protect that delicate and vulnerable part of our coastline. Seldom have I come across an organisation, civic, sporting or social, whose members and participants demonstrated the care necessary to protect this Taonga.

NZMCA has shown that care.

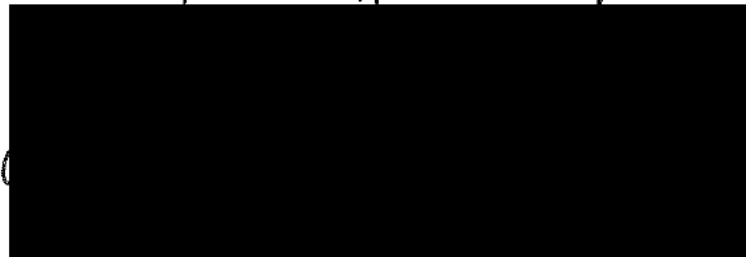
Accordingly, I humbly request that NZMCA be granted the responsibility to protect and nurture the land, and that their RCA be favourably considered.

Faithfully yours

Richard Hatherly

Sent from my iPhone

R Hatherly
5 July 2021





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a-rohe o
ōtepoti

SUBMISSION FORM 13

Submission concerning resource consent on limited notified application under section 95B, Resource Management Act 1991

To: Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

Resource Consent Number: LUC-2020-293

Applicant: New Zealand Motor Caravan Association

Site Address: 20 Bay Road

Description of Proposal: Establishment and operation of a members only motor caravan park

I/We wish to lodge a submission on the above resource consent application (please read privacy statement):

Your Full Name:

RICHARD JOHN HATHERLY

Postal Address:

[Redacted]

Post Code: 9010

Telephone:

[Redacted]

Email Address:

[Redacted]

I wish the following to be used as the address for service (choose one): email post other: DELIVERY to ACC by me on 5 JULY 2021

I would like my contact details to be withheld: Yes ☐ No ☒ (tick one)

I Am/Am Not (delete one) a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

Trade competitors only:

I Am/Am Not (delete one) directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

Note: If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

I: Support/Neutral/Oppose this Application (choose one)

The specific parts of the application that this submission relates to are [give details]:

please refer to letter attached.

Please attach other pages as required

My submission is [include the reasons for your views]:

please refer to letter attached

PLEASE TURN OVER

Please attach other pages as required

I seek the following decision from the Council [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Please attach other pages as required

Note: If you have a right of appeal under section 120 of the Resource Management Act 1991, you may appeal only respect of a matter raised in your submission (excluding any part of the submission that is struck out).

I: **Do/Do Not** wish to be heard in support of this submission at a hearing (delete one)

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Yes ☒ No ☐ (tick one)

I request, pursuant to section 100A of the Resource Management Act 1991, that you delegate your functions, powers, and duties required to hear and decide the application to 1 or more hearings commissioners who are not members of the Council

Yes ☒ No ☒ (tick one)

Note: If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

Signature of submitter: _____
(or person authorised to sign on behalf of submitter)

Date: 5 May 2021

Notes to Submitter:

Closing Date: The closing date for serving submissions on the Dunedin City Council is **Monday, 05 July 2021 at midnight**. A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Dunedin City Council. The applicant's address for service is **New Zealand Motor Caravan Association, C/O Kelly Bombay, Stantec, PO Box 13052, Armagh, Christchurch 8141** or kelly.bombay@stantec.com

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to resconsent.submission@dcc.govt.nz

Privacy: Please note that submissions are public. Your name, contact details and submission will be included in papers that are available to the media and the public, **including publication on the Council website**. You may request your contact details be withheld. Your submission will only be used for the purpose of the limited notified resource consent process.

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- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Laura Mulder

From: Trevor Price [REDACTED]
Sent: Sunday, 4 July 2021 03:41 p.m.
To: Resource Consent Submissions
Subject: LUC-2020-293Resource consent new Zealand motor caravan association
Attachments: Image (25).jpg; Image (26).jpg

Categories: Laura

hi attached is our submission on the nz motor caravan association application



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CITY COUNCIL a-rohe o
Otepoti

SUBMISSION FORM 13

Submission concerning resource consent on limited notified application under section 95B, Resource Management Act 1991

To: Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

Resource Consent Number:

LUC-2020-293

Applicant: New Zealand Motor Caravan Association

Site Address:

20 Bay Road

Description of Proposal:

Establishment and operation of a members only motor caravan park

☒ We wish to lodge a submission on the above resource consent application (please read privacy statement):

Your Full Name:

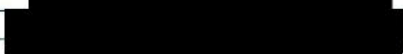
Trevor Price & Kerry price

Postal Address:



Post Code: 9449

Telephone:



Email Address:



I wish the following to be used as the address for service (choose one):

☒ email

☐ post

☐ other:

I would like my contact details to be withheld:

Yes ☒

No ☐

(tick one)

~~I am~~ / Am Not (delete one) a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

Trade competitors only:

I Am/Am Not (delete one) directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

Note: If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

I: ~~Support~~ / ~~Neutral~~ / Oppose this Application (choose one)

The specific parts of the application that this submission relates to are [give details]:

Noise pollution from Vehicles will impact our quality of life.
Vehicle moving in and out all day & night will affect our privacy and enjoying our outside areas.
Negative Visual impact

Please attach other pages as required

My submission is [include the reasons for your views]:

Our house is on a high Level so we will see motor homes & Caravans
We will can hear people & vehicles from the Warrington Domain
now the proposed site for New Zealand Motor Caravan Association will be closure and I believe there will be unreasonable noise.

PLEASE TURN OVER

