

APPENDIX 3:

COUNCIL OFFICER EVIDENCE

Memorandum

TO: Robert Buxton, Planner

FROM: Luke McKinlay (Landscape Architect - City Development)

DATE: 10 August 2021

SUBJECT: **LUC-2020-293**
20 Bay Road. Warrington.
LA Comments

The following is in response to your request for further comment on the above resource consent application for the use and development of the subject site (proposed Lot 2 SUB-2018-148) located at 20 Bay Road, Warrington, for 60 self-contained vehicles and caravans to be used by members of the New Zealand Motor Caravan Association (NZMCA). These comments also address submissions received in response to the limited notification.

The site

The subject site is comprised of relatively flat to undulating low lying sand dunes, located on the spit between Warrington Domain and Blueskin Bay.

The site is 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 freedom camping area) and is bordered to the west by an unformed road that forms the coastal edge of Blueskin Bay.

The property at 20 Bay Road is currently subject to subdivision consent SUB-2018-148, which approved the subdivision of the site into 3 lots (the current proposal relates to Lot 2 of SUB-2018-148). Lot 1 will have an area of 0.5793ha and will contain the existing Kings High School education facility and would be gifted to the school. Proposed Lot 1 would be accessed from Bay Road via a Right of Way (ROW) over proposed Lot 2. Proposed Lot 2 (2.84ha) will make up the residual site including the leg-in, except for proposed 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 would 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 subdivision is currently at the s223 stage and as a result, the titles for the proposed lots have not been issued to date.

The proposal

As the application only relates to Lot 2, the subject site from here on will be in reference to the 2.84-hectare area of the property that is subject to the current proposal. The key components of the proposed use are;

- The existing access strip off Bay Road will be formed with compacted aggregate which will involve minor excavation (to strip approximately 250mm depth of topsoil) and drained.
- Provision of a portable water supply.
- Provision of a small sign at gate entrance which includes the words 'NZMCA Members Only'.
- A gate in the accessway recessed 12-15m from the road edge to ensure vehicles are on site/off road when opening and closing the gate.
- Provision of refuse and recycling facilities i.e. bins emptied on a regular basis by a commercial contractor.
- Placement of a small shed on the site for members use when registering their stay.
- Earthworks (primarily placement of fill) in order to provide an even surface for vehicles and provide additional buffer over areas of cultural interest.
- Parking areas to be delineated by landscaping.

Members of NZMCA will be permitted to stay on a temporary basis only – no semi-permanent residence allowed. The application states, the usage figures of existing NZMCA parks show an average length of stay per visit to be approximately 2-3 nights.

Relevant Planning Matters

The application site has split zoning, with the activity to occur on both the **Township and Settlement** zone and the **Coastal Rural** zone. The campground activity falls within the definition of visitor accommodation which is a restricted discretionary activity within the Township and Settlement zone and a discretionary activity within the Rural zone.

The subject site is also affected by the following overlays and mapped areas;

- Wahi Tupuna Mapped Area – Okahau (Warrington)
- Wahi Tupuna Mapped Area – Purakaunui to Hikaroroa to Huriawa
- Coastal Character Overlay
- Archaeological Sites (Warrington moa hunting site)
- Hazard 3 (Coastal)

As an archaeological authority is yet to be obtained from New Zealand Heritage, and earthworks (including small scale) on the subject site are a non-complying activity.

Initial Assessment

Landscape comments on this proposal, which informed the s95A assessment, were provided by former DCC Landscape Architect, Barry Knox, who has since retired. His comments were as follows:

- *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.*

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.

Comments

It is agreed with the above 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.

There will be seasonal changes in the numbers of NZMCA members using the facility, which will determine the extent of potential adverse visual amenity effects associated with clusters of motor homes and caravans within this part of the Warrington Sand Spit, which retains some natural character values. During the summer months, when the facility is most likely to be fully occupied, it is considered that the mitigating effects of proposed native screening planting will be necessary to enable this development to visually integrate with its surroundings and maintain the amenity of nearby residents.

It is acknowledged that the Town and Settlement zoning across parts of the site anticipates residential development, however, it is considered that the visual effects of up to 60 vehicles using the site will differ from potential visual effects associated with typical residential development. These types of vehicles are predominantly white, which will tend to highlight their presence, there will be movement associated with vehicles coming and going and there will likely be a degree of activity in and around the vehicles commensurate with normal camping activities. All of which will potentially draw attention to the facility from surrounding locations and justify a well-considered mitigation planting proposal.

It is acknowledged that there is a good buffer of existing vegetation along the southern and eastern boundaries of the site. It is considered that 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.

With regards to the natural character of the site, it is acknowledged that in terms of existing landcover, the site is highly modified. Existing vegetation on the property is dominated by exotic species, except for some Ngaio trees and occasional native shrubs. Nevertheless, it is considered that the existing natural character is in part related to the existing low levels of development and the proximity to the adjacent estuary. When at full capacity, the proposed development will potentially have some adverse effects on these natural character values. It is considered that some additional, locally appropriate coastal planting would be beneficial at the western end of the southernmost parking rows to form a buffer with the estuary edge and the associated public access/track. It is noted that Council's biodiversity officer has made some comments regarding potential damage to nearby saltmarsh turf at the estuary edge (outside of the site) caused by increased use of the site and associated foot traffic. He makes several recommendations regarding potential barriers/signage to avoid damage to this ecologically significant saltmarsh vegetation. Potentially, additional planting in this area could be integrated with these strategies to protect the natural character values of the coastal edge and the amenity of users of the coastal walkway.

It is noted that the applicants have proposed a variety of surface treatments across the site, which will all effectively result in a grassed surface (some areas include reinforcement mats). It is acknowledged that this will help the NZMCA facility from having an overly urban appearance that could have resulted from the use of a metaled or sealed surface.

Submissions

The application was limited notified to all 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).

Submissions closed on 5 July 2021. Five submissions were received by the close of the submission period, with four opposing and one supporting the application. Of the four opposing submitters, the following matters with potential visual and landscape amenity effects were raised:

Louise Marsh and Quentin Johnston (24 Bay Road)

- Concern regarding light pollution from extra vehicles entering the access road from the west end of Bay Road. The submitter states "the path of this light would travel across the front of our house, including our bedrooms, impacting on our quality of life".
- Concern regarding "residential coherence". The submitter notes that there are an estimated 220 households in the Warrington community. They consider that an increase of 60 mobile homes per night at this site would represent a 27% increase in households, creating a number of issues. They include a photo from 28 Bay Road, to illustrate the impact of the NZMCA campground that was run in the same location previously.
- This submission also considered that there will be cumulative effects associated with the proposal, given that there is an existing freedom camping site at the Warrington Domain to the east of the subject site, which is managed by the DCC. The submission notes that cumulative effects are "*particularly in relation to the significant increase in movements of large, unfamiliar vehicles, through a low density and quiet residential township*".
- In conclusion, they also state: "*We believe the proposed access location is inappropriate on this basis and will significantly undermine our residential amenity and coherence*"

Comments

24 Bay Road is located on the eastern side of the proposed driveway to the proposed motorhome and caravan park. The submitter's dwelling is located near the southern end of the property (approximately 43m from the road boundary). The western façade of the dwelling is located approximately 7m from the boundary with the proposed leg-in access.

The submitters consider that the proposed location of the access is inappropriate and will significantly undermine their residential amenity. The effects of vehicle lights shining towards their dwelling, including their bedrooms, as vehicles enter the property from the west is specifically mentioned as potentially affecting their quality of life.

The dwelling at 24 Bay Road is somewhat elevated above the level of the road and overlooks the adjacent access to 20 Bay Road (refer figures 1 & 2 in appendix 1). The generous setback of the dwelling from the front boundary and its elevated location, will likely help to reduce the level of effect associated with vehicle lights shining into the submitters house. However, it is acknowledged that during the summer months, when the proposed facility is most likely to be fully occupied, there may be some nuisance effect associated with some light washing over the road front façade of their dwelling, even if it is not a direct beam of light, in close proximity.

Because the dwelling is somewhat elevated above the level of the proposed accessway, views will be available from the western side of the dwelling overlooking the accessway (refer fig 2), until existing boundary vegetation grows to provide more comprehensive screening of the accessway, and additional proposed mitigation planting establishes, there will also likely be nuisance visual effects with vehicles entering and existing the camping facility, particularly at the busiest times of the year. It is noted that the leg-in access is a little over 17m, so there is sufficient room to establish additional screening vegetation on either side of the accessway to mitigate these visual effects.

Muschamp (10 & 16 Bay Road)

- Annoyance factor for adjoining neighbours associated with vehicle lights of motor homes entering site at night
- Concern regarding potential damage caused to the estuary coastline by increased foot traffic
- General concern that adverse effects will be more than minor

Comments

The submitters dwelling is located relatively close to the road-front boundary. Some separation between the shared boundary with the leg-in access to the subject site and the dwelling is provided by the garage and vehicle entrance to 16 Bay Road. With regards to the potential "annoyance factor" associated with vehicle lights, it is noted that there is some existing vegetation within the applicants property, which will help to screen vehicle lights from shining directly into the ground level of the applicants dwelling (refer figure 3). With the addition of further screening mitigation planting, visual nuisance effects of lights from vehicles entering the property from the east can likely be kept to low levels.

It is noted, however, that there is little in the way of existing screening vegetation along the rest of the adjoining boundary with the accessway (refer figure 4). Until such time that proposed mitigation planting establishes, the submitters visual amenity (both from their dwelling and from outdoor spaces) will likely be adversely affected during the proposed facilities busiest time of year. As outlined in the integrated transport assessment, the maximum expected daily traffic volume is estimated at 122 vehicles per day, with peak hour volumes of 20 vehicles per hour. Unmitigated,

this level of vehicle movements would likely lead to some adverse visual effects associated with the distracting to-ing and fro-ing of vehicles adjacent to the eastern boundary of 16 and 10 Bay Road. Once mitigation planting establishes, it is considered that visual amenity effects can be kept to low levels.

Trevor Price (22 Bay Road)

- Negative visual impact
- The submitter states that their house is on a high level so they will see the motorhomes and caravans.
- The submitter requests a reduced number of motor caravan parks.

Comments

This submitter's property adjoins the eastern boundary of the proposed access to the motorhome/caravan facility. Views from the accessway towards the submitters dwelling are shown in figure 5 (refer

Appendix 1). Potential visual effects associated with the proposal will be predominantly associated with the movement of vehicles back and forth along the accessway. As noted above, these effects are likely to be greatest in the summer months, when up to 122 vehicle movements per day are possible.

It is noted that there are some well-established trees on the western boundary of this property, however, views towards the proposed accessway will be available beneath the canopy of these trees (refer figure 5). Once proposed screen planting along the accessway boundary establishes, it is considered that visual effects of vehicle movements on the residents of this address can be kept to low levels.

Well established vegetation along the southern boundary of this property appears to provide a good level of visual screening of the proposed motorhome and caravan parking areas.

Aukaha Submission

This submission is made in the context of the Kāi Tahu relationship of the wider surrounding catchment. As expressed in the submission, "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."

This submission identifies that the application site is of high cultural value and was a place of significant Kāi Tahu activity, which is proven by the presence of various archaeological sites.

Kāi Tahu submits that the application should be declined.

Comments

Effects of the proposal on the high cultural values attributed to this site by Kāi Tahu are outside the scope of these comments.

Conditions offered by the applicant

The following conditions have been offered by the applicant:

Landscaping

2) The landscape planting shall be undertaken in general accordance with the approved Landscape Plan. Landscaping internal to the site will be used to delineate the camping bays but may not be established exactly as shown on the site plan.

3) The landscape boundary planting along the northern boundary of the site shall be maintained to a minimum height of 2m and a minimum width of 1 metre to provide adequate screening of the site. Any dead plants shall be replaced to maintain this screening function.

4) The plantings referred to in condition (2) above shall be implemented within 12 months of the motor caravan park co

Comments

These conditions appear insufficient to address potential adverse visual amenity effects associated with the application. It is assumed that condition 3 refers to the planting adjoining the Kings College site. It is considered that a minimum width of 1m for this planting is insufficient to create a useful visual screening function. It is recommended that this is amended to require planting in this area to have a minimum width of at least 3m to enable a “multi layered” planting approach to be implemented, which includes tree species, as outlined at 6.4.1 of the application.

Given the reliance on mitigation planting to manage visual amenity effects, it is agreed with the initial landscape advice that a full mitigation planting plan, based on the landscape plan, is required as a condition of consent. This plan should include the botanical name, common name, numbers, size at planting, mature height and plant spacings of all proposed planting. Plant species should be based on Dunedin City Council’s Native Planting Guide species list for Sand Dune Forest. The planting plan should be prepared by a suitably qualified professional.

It is also recommended that additional locally appropriate coastal planting is provided at the western end of the southernmost parking rows to form a buffer to the Blueskin Bay edge of the site and associated public access/tracks.

Appendix 1: Site Photographs



Figure 1: 24 Bay Road and entrance to site.



Figure 2: 24 Bay Road, as viewed from proposed accessway



Figure 3: 16 Bay Road, as viewed from near entrance to site.



Figure 4: 16 Bay Road, as viewed from proposed accessway.



Figure 5: View towards 22 Bay Road from accessway to site



Figure 6: 22 Bay Road, as viewed from the south (near Kings High School facility)



Figure 7: View to the north from near the northern extent of the proposed stage two parking area.

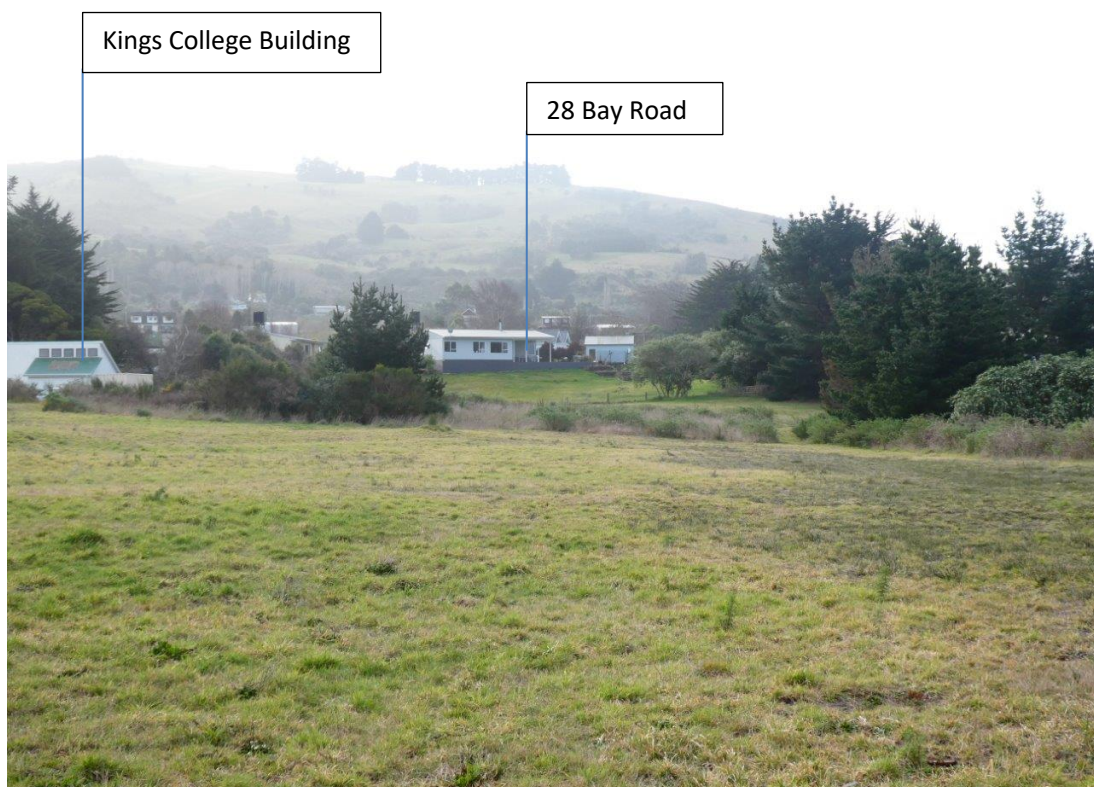


Figure 8: View towards the north from near existing tall shelter trees at the southern extent of the site.

TO: Robert Buxton, Consultant Planner

FROM: Jeremy Moyle, Heritage Consultant

DATE: 16 August 2021

SUBJECT: **LUC-2020-293 20 BAY ROAD HERITAGE COMMENTS**

Dear Robert,

Please find my heritage comments for application LUC-2020-293 for the proposed establishment of a camping site at 20 Bay Road, Warrington, as follows.

Please note, as there are no appeals relevant to this application from a heritage perspective, it has been assessed under the 2GP rules and assessment guidance only. The activity has been assessed non-complying.

Heritage Status

The entry of the site is situated within the extent of the Warrington moa hunting site (A040) as mapped in the 2GP.

The Application

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.

- Stage 1 – 46 parking spaces
- Stage 2 – 10 Parking spaces, and the removal of two stage one spaces

Although a total of 56 parking spaces are planned, 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.

Rule 13.3.3 requires that earthworks on a scheduled archaeological site must have an Archaeological Authority from Heritage New Zealand Pouhere Taonga if required (HNZPT). An Authority is required because there is the potential that the proposed earthworks will affect archaeological material on the site. No Authority has been obtained meaning the proposed earthworks are a non-complying activity.

Archaeological Background

The Warrington moa hunting site (A040) as mapped in the 2GP is an area encompassing most of Warrington Spit. The broad extent of this mapped area recognises that the entire area is an archaeological site complex containing archaeological material dating back to the earliest period of human settlement in New Zealand (evidenced by the discovery of moa bone).

Within the mapped area of the Warrington site complex, six archaeological sites have been recorded in ArchSite, the New Zealand Archaeological Association's (NZAA) site recording database (I44/125, I44/177, I44/178, I44/180, I44/194, and I44/200). These NZAA sites represent specific

areas where archaeological material has previously been identified. They are not a comprehensive record of the archaeological material actually present at the site. Instead, they are the result of four decades of ad hoc surveys and excavation monitoring driven by development and coastal erosion.

Archaeological work in the vicinity of 20 Bay Road begins in the early 1980s with a survey of the area by Brian Allingham. Two NZAA sites were recorded at/near 20 Bay Road after this survey: I44/177 and I44/178. Other documented investigations include:

- Annual excavations/excavation monitoring at several locations by Allingham between 1983 and 1989.
- Monitoring of earthworks and vegetation removal by Jill Hamel in 2000.
- Augers and test pits by Richard Walter and Chris Jacomb in 2007.

HNZPT also has also previously issued Authorities for additional work at and around 20 Bay Road but has not yet received the final reports for these investigations. These include:

- 1 Esplanade by Brian Allingham in c. 2008
- 22 Bay Road by Brian Allingham in c. 2010
- 36 Bay Road by Brian Allingham in c. 2011
- 20 Bay Road by Emma Brooks in c. 2012
- 36 Bay Road by Hayden Cawte in c. 2014

Most recently, in 2020, New Zealand Heritage Properties (NZHP) have completed a walk-over site survey and monitored geotechnical test pits in association with the proposed camping site development. The survey encountered some scattered archaeological material. No cultural material was found in the test pits aside from a bluestone cobble interpreted a manuport, but not clearly associated with a particular phase of occupation.

Most the previous work outlined above has been primarily concerned with NZAA site I44/177, an area containing intermittent deposits of cultural material dating from the earliest period of human settlement in New Zealand through to more recent phases of Māori history.

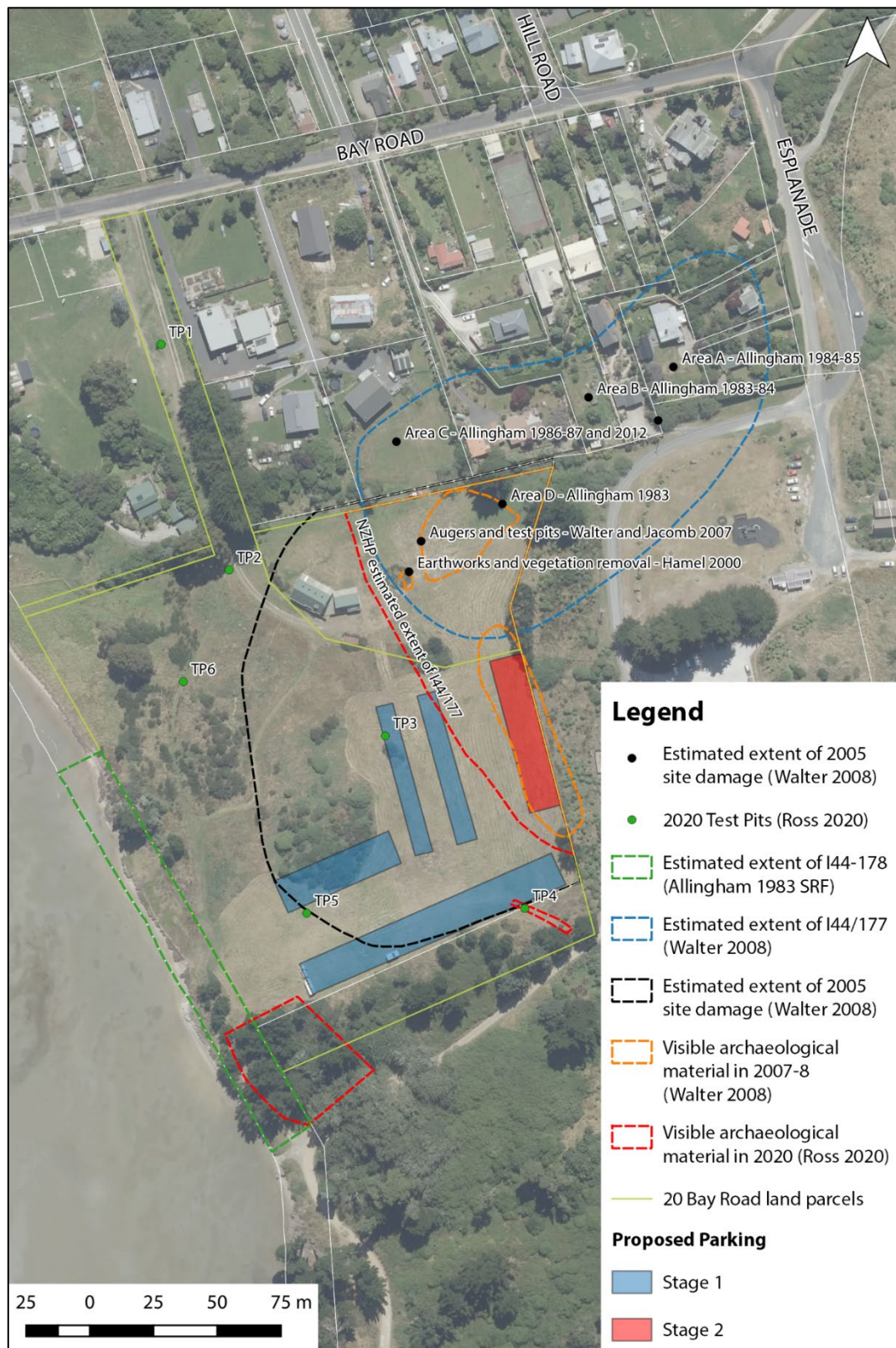
The actual extent of NZAA site I44/177 is not entirely clear and has changed over time as archaeological work has progressed. Allingham's early 1980s survey suggested it covered the very north-east corner of 20 Bay Road and the rears of 28, 30, and 38 Bay Road. Walter and Jacomb's work records the site extending further on to 20 Bay Road as well as the property at 3-11 Esplanade in 2008. Walter and Jacomb also note visible shell and charcoal down the eastern boundary of 20 Bay Road, but it is unclear if they consider this part of I44/177. Most recently, the NZHP survey has assessed the site as extending further eastward and southward than previously identified. They have also identified an additional area of cultural material exposed near at the south-east corner of 20 Bay Road, but it is unclear if they consider this part of I44/177. Also, past investigations indicate that the site has a 'patchy' character. Rather than a consistent series of well-defined cultural occupation layers spreading across the site, archaeological material is intermittently scattered around the landscape alongside occasional more concentrated cultural deposits. Walter and Jacomb's test pits and auger results provide a good example of this, with TP7 encountering an intact cultural layer within 5-20m of TP1 and TP8, each of which encountered only sterile sand.

The 20 Bay Road site and I44/177 has been subject to numerous instances of land modification and archaeological site damage (as noted in the NZHP report). This dates to the 19th century, when historic newspaper reports imply archaeological material as being fossicked from the site. Later historic aerial photographs show the establishment of exotic vegetation on 20 Bay Road. More recently there has been a series of activities at 20 Bay Road that have damaged/are thought to have damaged the archaeological site:

- 2001 – Vegetation clearance.
- 2005 – Vegetation clearance, land contouring, and harrowing.

- 2011 – Vegetation clearance, driveway works.

The specific effects of this past site damage are not clear as archaeologists have not been present to view archaeological material as it was exposed/destroyed.





Map showing an estimate of the proposed excavation areas as described in the application and RFI documents.

Heritage Comments

As part of the establishment of a camping site at 20 Bay Road the applicant proposes to carry out a variety of earthworks¹ across the site. From the pavement options memo included with original application, and the RFI response from Kelly Bombay dated 31 March 2021, it is understood that the following earthworks are planned:

- 250mm deep excavation along the length of the driveway from Bay Road to form a gravel surface.
- Approximately 50mm deep excavation in circulation areas to form the proposed 'Type 1' pavement. The extent of this work has been estimated as it is not clearly defined beyond "near the kiosk/transition from the granular accessway onto the grassed areas at the head of each lane."
- Approximately 100mm deep excavation for planting strips.
- Approximately 300mm deep excavation for vegetation clearance.
- Approximately 150mm deep excavation for topsoil removal along parking bays.
- An undefined amount of excavation for native underplanting in the existing trees along the southern margin of the site.

All the proposed excavation may affect previously undiscovered archaeological material at the site and will require an archaeological authority from HNZPT. This has already been noted in the NZHP report, but it is important point to emphasise as it does not appear to have been discussed in the other application documents. There is a potential for encountering previously unrecorded material considering:

- The proposed extent of excavation.
- The shallow depth of some nearby deposits.
- The fact archaeological sites/material have been identified around all sides of the property.
- The poor definition of I44/177, which seems to suggest a scattered collection of archaeological material across a broad area (i.e., part of the general Warrington moa hunting site complex) rather than a focused occupation site.

Though the NZHP survey and test pit monitoring only identified archaeological material in three specific areas at 20 Bay Road, it also did not exclude the possibility of additional material elsewhere at the property. Beyond the eastern edge of 20 Bay Road the ground was obscured by grass and vegetation growth, and the test pit monitoring only covered seven locations which were determined by Stantec and not an archaeologist. It is possible past land modification has seriously damaged or destroyed archaeological material across the site, but the extent of this is unknown because no works were monitored by an archaeologist. Accordingly, NZHP recommended 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 extent further than currently recorded."

The applicant's proposed approach to mitigate the impact on archaeology is thoughtful and commendable. The proposal to build up ground along the eastern edge of the property – the Pavement Type 2 – will prevent any damage to the archaeological material that has been identified in this area. Beyond this a clear effort has been made to minimise the extent of earthworks across the site, with most of the land either left as it is or contoured with fill (Pavement Type 3). Where excavation is proposed, it is mostly limited to topsoil stripping (Pavement Type 1) or reasonably localised areas of deeper vegetation removal and plantings. It is expected that a small part of I44/178 will be disturbed by planting along the southern margin of the site, though this site is:

¹ The definition of 'earthworks' can vary between different professions and situations. Here earthworks are taken to be any excavation of the existing ground level regardless of size. This includes vegetation clearance and excavation for landscaping.

- Likely already quite disturbed by tree roots.
- Possibly a natural feature.

The driveway excavation is more substantial, though it should be noted that this work is a requirement of LUC-2018-555. Monitoring of the pavement scheme over the winter is also proposed to assess the efficacy of the work. This monitoring could also include archaeologists' visits to assess the impact of vehicle movement on archaeological material (if any).

An Archaeological Authority from HNZPT will be required for the work. No Authority has yet been applied for. It is understood from a conversation with the HNZPT Otago/Southland Archaeologist Nikole Wills that she has advised the applicant to secure runaka support for the proposed camp site prior to applying for an Archaeological Authority. It is also understood from conversations with Ms Wills that HNZPT did not submit on this resource consent application because their only interest was in the archaeological dimension of 20 Bay Road, and that this could be managed through the Archaeological Authority process.

Summary

In summary:

- 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.

Kind regards,

Jeremy Moyle

Archaeologist and Heritage Consultant

Memorandum

TO: Robert Buxton (Consultant Planner)

FROM: Richard Ewans, Biodiversity Advisor

DATE: 18 August 2020, updated 28 July 2021

SUBJECT: LUC-2020-293 – 20 BAY ROAD, WARRINGTON – PROPOSED CAMPER VAN PARK – BIODIVERSITY COMMENTS

Hi Connor,

Please find my biodiversity comments on application LUC-2020-293 as follows.

1. The application seeks resource consent for the use and development of the site at 20 Bay Road, Warrington, for 60 self-contained vehicles and caravans to be used by members of the New Zealand Motor Caravan Association (NZMCA).
2. This memo provides comments on the effects of the proposal on indigenous biodiversity values at the site.
3. I undertook a site visit between 2:30pm and 4:00pm on 14th August 2020.
4. In summary my comments conclude that:
 - a) The effects on indigenous biodiversity values on the property from the proposal are negligible provided existing ngaio trees are avoided;
 - b) The proposed native plantings will enhance 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
 - c) Potential significant adverse effects on indigenous biodiversity in the adjacent area of indigenous saltmarsh vegetation can be anticipated and should be avoided.

Site description and assumptions

5. I define the site as the property of 20 Bay Road, Warrington and the adjacent estuary margin to the east. Exotic species are denoted using “*”.
6. I used the Stantec Landscape Plan dated 30 June 2020 in the application to base my comments on in terms of the proposal design.
7. Based on the application map provided, I make the assumption that any vegetation clearance would avoid the ngaio trees marked on the map in Appendix 1 are to be avoided. This would be appropriate. Ngaio is listed on the 2GP Appendix 10A.3 Important native tree list.
8. The site is comprised of relatively flat to undulating low lying sand dunes, located on the spit between Warrington Domain and Blueskin Bay. The property adjoins an area of saltmarsh on the estuary margins of Blueskin Bay.

9. Both active and stable sand dunes are originally rare/naturally uncommon ecosystems¹ classified as 'endangered'². Estuaries (which include saltmarsh on the margins) are also originally rare/naturally uncommon ecosystems and classified as 'vulnerable'. The site also lies within an 'acutely threatened' land environment³ with less than 10% indigenous cover left nationally.
10. Sand dunes have been heavily modified by human activities nationally and this site is no exception. Examples of intact native dune ecosystems are very rare and sand dunes are a high priority for ecological restoration.
11. The vegetation on the property at the site is dominated by exotic species. The eastern and southern areas where parking is proposed consists of pasture with regenerating shrub weeds tree lupin* (*Lupinus arboreus*) and broom* (*Cytisus scoparius*). Vegetation in the north-western area of the property is similar, but the pasture is rank and the shrub weeds taller.
12. A small patch near the middle of the property contains several regenerating ngaio (*Myoporum laetum*) trees and occasional native shrubs of poroporo (*Solanum laciniatum*) and mingimingi (*Coprosma propinqua*). Apart from these native species the patch is comprised mostly of shrub weeds including broom*, gorse* (*Ulex europaeus*), flowering currant* (*Ribes sanguineum*), boxthorn* (*Lycium ferocissimum*), and elderberry* (*Sambucus nigra*).
13. The row of pine trees on the southern boundary retains a similar mix of shrub weeds in the understorey.
14. On the site adjacent to the property to the west is the estuary margin which supports an area of indigenous saltmarsh vegetation (see map in Appendix 1 and Plates 4-6). A narrow gap in the saltmarsh provides foot access to the estuary. The saltmarsh turf vegetation is dominated by glasswort (*Sarcocornia quinqueflora*) and remuremu (*Selliera radicans*), with other species present including sea blight (*Suaeda novae-zelandiae*), *Isolepis cernua* and New Zealand celery (*Apium prostratum*). Patches of the native rush three-square (*Schoenoplectus pungens*) are present on the inland side of the saltmarsh. A patch of saltmarsh ribbonwood is present at the northern end of the saltmarsh area.
15. The indigenous saltmarsh turf vegetation meets the 2GP Policy 2.2.3.2 criteria for an Area of Significant Biodiversity (ASBV) for Rarity (2.2.3.2.b.ii & iii) and Representativeness (2.2.3.2.c).

Effects on indigenous biodiversity values from proposal

16. Potential adverse effects on biodiversity values from the proposal at this site result from the clearance of vegetation but the small amount of vegetation clearance proposed on the property is of exotic vegetation and therefore the effects on indigenous biodiversity values on the property from the proposal are negligible.
17. However, due to the likely substantial increase in the usage of the site and resulting foot traffic down to the estuary, it is anticipated that there could be significant adverse effects on the adjacent ecologically significant saltmarsh vegetation associated with the proposal.

¹ Wiser SK, Buxton RP, Clarkson BR, Hoare RJB, Holdaway RJ, Richardson SJ, Smale MC, West C, Williams PA 2013. New Zealand's naturally uncommon ecosystems. In Dymond JR ed. Ecosystem services in New Zealand – conditions and trends. Manaaki Whenua Press, Lincoln, New Zealand.

² Holdaway RJ, Wiser SK, Williams PA. 2012. Status Assessment of New Zealand's Naturally Uncommon Ecosystems. *Conservation Biology* 26(4), 619-629.

³ Walker S, Cieraad E, Barringer J. 2015. The Threatened Environment Classification for New Zealand 2012: a guide for users. Landcare Research Contract Report LC2184.

18. Although not located on the property, the proximity of the saltmarsh turf (which is highly sensitive to trampling and other disturbance) and high risk of damage from potentially over 100 people per day plus pets using the site, means that actions should be taken to avoid adverse effects and maintain biodiversity values (see 2GP Rule 16.11.2.1.j & k).
19. A barrier fence on the property boundary along the length of the saltmarsh (including fencing the ends and access pathway), with a gap or gate where the existing estuary access is, would help guide people away from the sensitive saltmarsh vegetation to avoid trampling.
20. Alternatively, the entire length of the property boundary along the length of the saltmarsh (including fencing the ends and access pathway) could be fenced off, with access to the estuary from existing tracks and routes close by.
21. Interpretation signage at the gap/gate explaining the values of the saltmarsh would help inform users of the reason for the fence barrier, and to make informed choices about their use of the site that minimise impacts of indigenous biodiversity. Interpretation should be included anywhere else information is provided about the site to users, including the property entranceway or kiosk, and any relevant physical or electronic information resources.

Native plantings

22. Native plantings are proposed for campervan parking screening, along the drive accessway, and under the tall exotic pine trees on the southern boundary.
23. Prior to clearance by humans, the property would have been covered by sand dune podocarp-broadleaved forest likely characterised by Hall's totara (*Podocarpus laetus*), ngaio and kanuka (*Kunzea robusta*). Sand dune forest is now very rare in the eastern South Island and the opportunity should be taken to plant with eco-sourced native species appropriate to the area, rather than amenity type plantings (even if they included non-local native species).
24. Commendably, the proposal has utilised the DCC's Native Planting Guide species list for Sand Dune Forest and a planting species list based on the guide is provided in Table 2-1 of the proposal. The following changes should be made to the table:
 - i. Replace totara (*Podocarpus totara*) with Hall's totara (*Podocarpus laetus*); and
 - ii. Replace *Austroderia* sp. with *Austroderia richardii*.
25. A full species list of ecologically appropriate species (Sand Dune Forest) that could be utilised for native screen planting and native underplanting is provided in Appendix 2. A list of additional ecologically appropriate coastal species are provided in Appendix 2 for the drive accessway plantings should a lower profile of planting be desired.
26. Consent conditions should prescribe that a landscape planting plan using the species in Appendix 2 is to be submitted to Council for approval. The plan should describe how plants will be eco-sourced and include prescriptions for planting maintenance and management to ensure the ongoing health and vitality of the plantings. For trees, this would be until they reach 2m in height.
27. Native plantings that use the species listed in Appendix 2 would provide for an improvement (enhancement) of indigenous biodiversity values at the site.

Kind regards,
Richard Ewans
Biodiversity Advisor

Appendix 1. Map of site.

(Blue area marked = indigenous saltmarsh vegetation, yellow line = route to estuary, green dots = ngaio trees)



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>Meliclytus 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>	Matal	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

Appendix 3. Photographs of site.



Plate 1 – South-west corner of property, exotic grassland with regenerating tree lupin, pine trees on southern boundary.



Plate 2 – Looking north from south-east corner of property, exotic grassland with regenerating tree lupin and broom.



Plate 3 – North side of group of scattered ngaio trees among exotic shrubland near middle of property.



Plate 4 – Indigenous saltmarsh vegetation and estuary from near south-west corner of property. Route to estuary via a gap in saltmarsh vegetation (orange arrow).



Plate 5 – Indigenous saltmarsh vegetation on estuary edge adjacent to property.

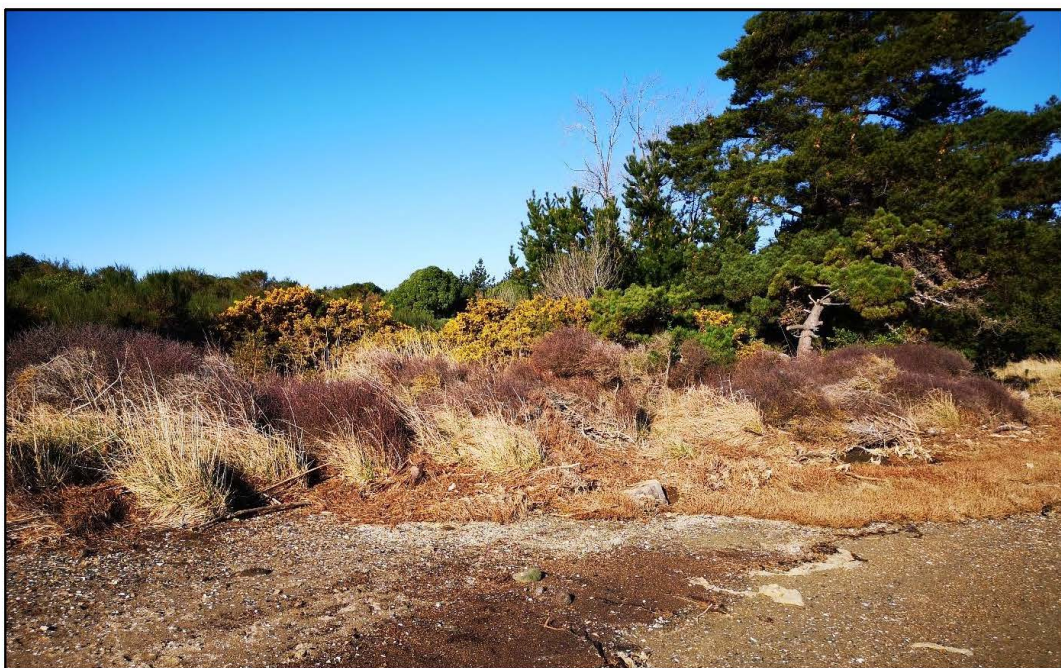


Plate 6 – Indigenous saltmarsh vegetation including saltmarsh ribbonwood (brown shrubs) on estuary edge adjacent to property.

Memorandum

TO: Robert Buxton-Walker, City Planning/Planning Consultant

FROM: Angus Robertson, Parks and Recreation

DATE: 29 July 2021

SUBJECT: **LUC-2020-293 – NZMCA CAMP SITE**
20 BAY ROAD, WARRINGTON, DUNEDIN

Hi Robert,

Thank you for the opportunity to comment on the above application for an NZMCA site at Warrington. DCC Parks and Recreation Services (PARS) are the administering body of the adjacent Warrington Domain (the Domain) which has also been proposed as a possible access option in response to opposition from submitters on the use of the legal access. These comments largely refer to the use of the reserve for access, rather than the effects of the wider proposal. The fact the application has gone to (limited) public notification based on the Bay Road access leaves open whether the applicant would need to vary the application, and if so, if further public notice may be required.

Warrington Domain was vested to DCC as Local Purpose (Coastal Protection) Reserve and is subject to the Reserves Act 1977. The Domain currently provides recreation opportunities for the local community and wider public, as well as toilets, changing rooms, playground and access to the estuary, the DCC wastewater treatment plant and the Warrington Surf Lifesaving Club. The site also provides one of three freedom camping areas in the City, attracting an average of 40-60 vehicles a night during peak season, with year-on-year increases in numbers prior to Covid. These numbers can also spike significantly during an event in the City.

The use of this space as a freedom camping area has been met with ongoing complaints from the local community, in particular those adjacent to the reserve; with issues including the volume of traffic, vehicle noise, and headlights illuminating neighbouring residential dwellings. While PARS have worked hard to alleviate these concerns, there remains a sense of animosity from many in the area toward use of the reserve for camping.

These existing pressures are a primary concern for PARS in considering a private access through the reserve. While 40-60 vehicles a night is already considerable for a quiet community, potentially doubling this with larger vehicles could have significant impacts for reserve users and the reserve itself, requiring further access maintenance and management. At present, PARS employ officers to monitor campers at the Domain during the season, ensuring compliance and issuing enforcement if necessary.

The proposal is generally unsupported and there is a summary of PARS primary issues on the following page, however, to authorise the use of part of the reserve, mainly the access road, to enable alternative access to its property by association members, Council would need to agree to either an Easement (S.48 RA1977), a Licence or a Lease (S.61 RA 1977). The option selected may well recognise that the use is a privilege and supports a commercial activity on private land, and require full public notification. These options may also trigger Ngāi Tahu Claims Settlement Act 1998 considerations.

Regards,
Angus Robertson
Parks and Recreation Planner
Recreation Planning and Facilities

Summary of issues

1. The complaints over the years from residents whose properties back onto the domain about the volume of domain traffic, especially at night. Issues include vehicle noise and light from headlights.
2. Increased maintenance costs of the Domain 'road' due to higher volume of vehicles.
3. The confusion that may arise by having a private camping area accessway coming from a public camping area, especially the number of complaints PARS already get about the public camping area.
4. Traffic flow around the site – increasing traffic volume, speed past the freedom camping site entranceway, lack of turnaround areas, dust etc may present other safety issues.
5. Potentially 120 additional vehicle movements a day through a public domain which is used by the local community; children, dogs, walkers, picnickers etc, as well as visitors using the campground.
6. The current public campground attracts 40-60 vehicles a night (pre-Covid); allowing access through this site could double the number of vehicles using the space.
7. There is no recreational, public or community benefit to allowing a private access through the domain.
8. PARS facilities need to be maintained daily to cope with the existing numbers – if another 60 vehicles a day are passing through there then these maintenance requirements will increase.
9. PARS current enforcement and monitoring efforts would only address issues caused by those using the freedom camping site, rather than all campervans using the reserve.

Memorandum

TO: Connor Marner, Planner

FROM: Tanya Morrison, Environmental Health Officer

DATE: 13-Aug-2020

SUBJECT: Land Use Consent - Description
LUC-2020-293 - 20 Bay Road Warrington

Environmental Health has reviewed this application to establish a camping ground at 20 Bay Road, Warrington.

Environmental Health comments on this application relate to noise requirements predominantly. The following standards, guidelines, plan rules and legislative requirements are applicable for consideration:

Noise

Construction noise:

The application did not mention any potential construction needing to be undertaken for this proposed activity. The exception might be the proposed earthworks, site preparation and landscaping mentioned in the application along with pavement resurfacing, all of which would be covered potentially by the construction noise standards. The applicant is invited to consult with the Construction noise standards table (as below) which summarises noise limits for works under 'typical duration' for what noise limits may apply:

Construction shall be limited to the times set out below and shall comply with the following noise limits for 'Long term duration' as per New Zealand Standard Acoustics – Construction Noise NZS 6803:1999.

Time of Week	Time Period	Leq (dBA)	L max (dBA)
Weekdays	0630-0730	55	75
	0730-1800	70	85
	1800-2000	65	80
	2000-0630	45	75
Saturdays	0630-0730	45	75
	0730-1800	70	85
	1800-2000	45	75
	2000-0630	45	75
Sundays and Public Holidays	0630-0730	45	75
	0730-1800	55	85
	1800-2000	45	75
	2000-0630	45	75

It should be noted that noise limits of (Leq) of 45 - 55 dBA during daytime and night time may mean that no construction work can take place. (NZS 6803:1999)

District Plan rules: Noise Limits

The applicant made mention (page 31 of the application) about the Dunedin District Plan noise limits as they apply to adjacent receiving sites of this proposed activity:

	7.00am to 7.00pm	7.00pm to 10.00pm	10.00pm to 7.00am
East – zoned recreation	50 dB LAeq (15 min)	45 dB LAeq (15 min)	40 dB LAeq (15 min); and 70 dB LAFmax
North – Township and Settlement	55 dB LAeq (15 min)	50 dB LAeq (15 min)	40 dB LAeq (15 min); and 70 dB LAFmax

The proposed activity might generate the following types of noise: people noise, increased traffic/vehicle movements and possible noise from gas generators being run.

It was acknowledged and Environmental Health agrees that the proposed activity might attract more people over the warmer summer months and around public holidays compared to winter months.

Acknowledging the NZMCA's rules and code of conduct for its' members, noise generated by people is covered by The Resource Management Act Section 326, (Excessive Noise) and to a degree, Section 16 of the Act (Unreasonable noise). The average intended stay for any NZMCA member on this (or any other of their sites) is 2-3 days. No Semi-permanent or permanent camping is to be undertaken on this site.

Adjacent to this proposed activity site is freedom camping on the Warrington reserve, which Council acknowledges to date, has not resulted in any noise complaints being received from this activity. It is anticipated that the proposed activity would not be too dissimilar to freedom camping already occurring nearby at The Warrington reserve in terms of effects on the surrounding environment, including noise emissions.

The applicant is recommended to review the provisions under the Act in relation to noise and ensure its members always try to minimise noise emissions from the proposed activity, despite how many members may be onsite at any given time.

(Moving) Vehicle noise is not governed by The Resource Management Act above-mentioned noise provisions. The applicant noted most vehicles were anticipated to arrive onsite during day time hours (between 9am and 4pm), therefore increased traffic to the site and potential noise from vehicles Environmental Health agrees is unlikely to cause noise issues such as disrupting sleep to any nearby residential dwellings or cause additional impact on the current receiving environment.

Environmental Health would strongly recommend to the applicant to include in their members rules/code of conduct that vehicles are not to arrive onsite in the 'night time period' as per Dunedin's District Plan (10pm – 7am) to minimise disturbance to any nearby residential properties or other campers from vehicle noise. Ideally vehicles should be encouraged not arrive/depart onsite during the evening shoulder period between 7pm – 10pm (as per the table above), however comparatively the night time period of 10pm – 7am has greater potential for sleep disturbance due to vehicle noise.

NZMCA proposed in its application some conditions should consent be granted for this proposed activity. Proposed condition 7, outlines that gas generators cannot be used by any member

between the hours of 8pm and 8am on any given day. Supporting information in the application suggests the typical duration for a generator to be run is under 3 hours (2-2.5 hours on average). Environmental Health agrees with this proposed condition to restrict generator use between 8pm and 8am on any given day in order to minimise potential noise effects, especially over the night-time period where sleep disturbance may arise.

Camping Ground Regulations 1985

Should consent be granted for this proposed activity, the NZMCA would need to be registered under the above-mentioned Regulations to obtain a 'Camping ground licence'. Environmental Health acknowledges the proposed activity is not that of a full, traditional camping ground type setup, therefore some exemptions may be considered and applied to the granting of NZMCA's registration under these regulations. Any exemptions would only be considered if resource consent was approved for this activity.

The Application stated that no dump station was proposed to be included on site should consent for this proposed activity be granted. The map in Appendix A Development Plans (Page 143 of the application) however, did show a site where a potential dump station could be installed, so it is unclear whether the applicant intends to install a dump station or not.

Whilst all NZMCA vehicle or caravan need to be certified self-contained, Environmental Health would like to make it a condition should consent be granted, to include dump station facilities onsite for campers to use.

Conclusion

Environmental health has no concerns over the granting of this consent from a noise point of view, however would agree with the proposed condition by the applicant for limiting the use of gas generators between 8pm and 8am on any given day. In addition, Environmental Health would like a condition of consent (if success) to be that dump station facilities be installed/available onsite for campers to use.

Conditions (should consent be granted)

1. Gas generators shall not be used within the site between the hours of 8:00pm and 8:00am, and advice to this effect shall be included on the sign erected on site.
2. Vehicles are not to arrive onsite during 'night time hours' 10pm – 7am as per Dunedin's 2GP District plan in order to minimise potential for sleep disturbance due to vehicle noise.
3. Should consent be granted, a dump station be installed onsite for camper to use.

TO: City Planning

FROM: Policy Analyst, 3 Waters

DATE: 19 August 2020

LUC-2020-293 DEVELOPMENT OF RECENT LOT 2 OF SUBDIVISION SUB-2018-148 INTO A CARAVAN PARK FOR NZMCA

SUBJECT: 20 BAY ROAD, WARRINGTON

3 WATERS COMMENTS

1. The proposed activity

Landuse consent is sought from DCC for the development of subject site (proposed Lot 2 SUB-2018-148) by (New Zealand Motor Caravan Association) NZMCA with a maximum of 60 self-contained vehicles and caravans to be used only by Members of the club at 20 Bay Road, Warrington. The site is split between two zones and is within the R1 and NCCLPA zones in the current District Plan and the Township and Settlement and Coastal Rural zones in the Second Generation District Plan (2GP).

Land use description

To develop the site to cater for 60 self-contained vehicles and caravans belonging to Members of the New Zealand Motor Caravan Association (NZMCA).

Existing services

The DCC's GIS records an 80mm diameter water pipe and a 200mm diameter wastewater pipe in Bay Road as well as 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.

2. Infrastructure requirements

Dunedin Code of Subdivision and Development 2010.

All aspects of this development shall be undertaken in accordance with the requirements of the Dunedin Code of Subdivision and Development 2010.

Water services

The Dunedin City Council Water Bylaw 2011 sets out the requirements for connections to the water supply network.

Each property must be serviced from an individual Point of Supply. For a new water connection or any change to an existing water connection, an "Application for Water Supply" is required.

Non-domestic water connections are metered and require a boundary RPZ backflow prevention device. Installation of an RPZ requires a building consent, or an exemption from a building consent. Details of the device and its proposed location will be approved through that process.

Firefighting requirements

All aspects relating to the availability of water for firefighting should be in accordance with SNZ PAS 4509:2008, being the Fire Service Code of Practice for Fire Fighting Water Supplies.

We are unsure how the firefighting needs for this development will be met and request that the applicant discuss this with the New Zealand Fire Service.

Stormwater services

To allow adequate pervious area for natural stormwater drainage, the maximum site coverage specified in the District Plan must be complied with. Please note that there are new site coverage rules in the 2GP for both building coverage and maximum site imperviousness.

Wastewater services

This wastewater discharge requires consent under the *Dunedin City Council Trade Waste Bylaw 2008*.

Any private drainage matters will be dealt with at the time of Building Consent.

Earthworks close to council infrastructure

There is a 200mm diameter wastewater pipe which 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. of the site within the property. An easement in gross is required for this as outlined below.

Any earthworks or construction on this lot must meet the requirements of the Dunedin Code of Subdivision and Development (2010) in relation to building in close proximity to Council infrastructure, unless otherwise approved by 3 Waters. The Code prohibits any building within 1.5 metres of a wastewater pipeline. If any building is proposed within 2.5 metres of a pipe or manhole, 3 Waters must be notified to discuss options and whether an encumbrance on the title is required. 'Building' includes decks, fences, garages, sheds, retaining walls and so on.

Easements

Service easement/s are required where any private water supply pipes or wastewater/stormwater laterals cross property boundaries in favour of the property they service.

It is deemed that the existing legal mechanisms that are in place are not suitable to protect the 200mm sewer within the property in the future. An easement in gross in favour of the Dunedin City Council is required over the Council owned wastewater pipe located within proposed Right of Way and across proposed Lot 2. The easement must be made in accordance with Section 5.3.4 of the Dunedin Code of Subdivision and Development 2010.

Erosion and Sediment Control

It is important that erosion and sediment control measures are utilised to control and contain sediment-laden stormwater run-off into neighbouring properties and the Council stormwater network from the site during any stages of site disturbance associated with this development. This could include diversion drains, sediment fencing, erosion control blankets etc. This is provided for as a condition of consent.

3. Consent conditions

The following conditions should be imposed on any resource consent granted:

Water Services

1. Each property shall have a separate service connection installed. An “Application for Water Supply” shall be submitted to the Dunedin City Council for approval to establish a water connection to the property. Details of how this property is to be serviced for water shall accompany the “Application for Water Supply”.
2. An RPZ boundary backflow prevention device shall be installed on the water connection, to the satisfaction of the 3 Waters (refer to advice note).

DCC owned infrastructure within this property

3. Any earthworks or construction on this lot must meet the requirements of the Dunedin Code of Subdivision and Development (2010) in relation to building in close proximity to Council infrastructure, unless otherwise approved by 3 Waters. The Code prohibits any building within 1.5 metres of a wastewater pipeline. If any building is proposed within 2.5 metres of a pipe or manhole, 3 Waters must be notified to discuss options and whether an encumbrance on the title is required. ‘Building’ includes decks, fences, garages, sheds, retaining walls and so on.

Easements

4. Service easement/s are required where any private water supply pipes or wastewater/stormwater laterals cross property boundaries in favour of the property they service.
5. An easement in gross in favour of the Dunedin City Council is required over the Council owned wastewater pipe located within proposed Right of Way and across proposed Lot 2. The easement must be made in accordance with Section 5.3.4 of the Dunedin Code of Subdivision and Development 2010.

Erosion and Sediment Control

6. The consent holder shall adopt all practicable measures to mitigate erosion and to control and contain sediment-laden stormwater run-off to prevent it entering the Council stormwater network, neighbouring properties during any stages of site disturbance associated with this development.

4. Advice notes

The following advice notes may be helpful for any resource consent granted:

Code of Subdivision & Development

- All aspects of this development shall be compliant with Parts 4, 5 and 6 of the Dunedin Code of Subdivision and Development 2010.

Water services

- Detail of the water supply application process can be found at <http://www.dunedin.govt.nz/services/water-supply/new-water-connections>.
- Installation of a boundary backflow prevention device requires a building consent, or an exemption from a building consent. Further information is available at <http://www.dunedin.govt.nz/services/water-supply/backflow>.
- 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.

Erosion and sediment control

- The following documents are recommended as best practice guidelines for managing erosion and sediment-laden run-off:
 - Environment Canterbury, 2007 “Erosion and Sediment Control Guideline 2007” Report No. R06/23.
 - Dunedin City Council “Silt and Sediment Control for Smaller Sites” (information brochure).

Trade Waste

- Trade waste requirements and an application form is available at: <http://www.dunedin.govt.nz/services/wastewater/tradewaste>.

Private drainage matters

- Private drainage issues and requirements (including any necessary works) are to be addressed via the Building Consent process.
- Certain requirements for building on this site may be stipulated via the building consent process and are likely to include the following points:
 - Stormwater from driveways, sealed areas and drain coils is not to create a nuisance on any adjoining properties.
 - Surface water is not to create a nuisance on any adjoining properties.
 - For secondary flow paths, the finished floor level shall be set at the height of the secondary flow path plus an allowance for free board.
 - As required by the New Zealand Building Code E1.3.2, surface water resulting from an event having a 2% probability of occurring annually, shall not enter dwellings. The finished floor level shall be set accordingly.

Policy Analyst

3 Waters

Dunedin City Council

TO: Robert Buxton

FROM: Jakub Kochan

DATE: 10 August 2021

SUBJECT: **NZ MOTOR CARAVAN ASSOCIATION CAMP SITE APPLICATION 20 BAY RD.
LUC-2020-293**

We have reviewed this proposal again in light of evidence provided within Aukaha's submission on behalf of Kāti Huirapa Rūnaka ki Puketeraki.
The conclusion is that there is not enough processing capacity in the wastewater treatment plant to accommodate additional wastewater discharge from proposed development.

Therefore, we will need to work with the applicant to see if we can possibly find an alternative solution.

In summary:

3 Waters agree with points 5.6-5.11 within Aukaha's submission on behalf of Kāti Huirapa Rūnaka ki Puketeraki.

Jakub Kochan
SUBDIVISION ENGINEER, 3 WATERS

TO: Connor Marner, Planner

FROM: Logan Copland, Planner – Transportation

DATE: 13 November 2020

SUBJECT: **LUC-2020-293**

20 BAY ROAD, WARRINGTON

APPLICATION:

Resource consent is sought for the development of the above site for 60 self-contained vehicles and caravans to be used by members of the New Zealand Motor Caravan Association (NZMCA). The site will be open to members of NZMCA only.

The site has a 17m wide, 135m long leg-in to Bay Road, where vehicle access to the site will be achieved. The site is currently subject to an approved subdivision consent SUB-2018-148, which approved subdivision of the site into 3 allotments, with the current proposal to be located on Lot 2 SUB-2018-148. Lot 2 will own the leg-in to Bay Road and Lot 1 will be accessed via Right of Way over that leg-in. Lot 3 is to be vested as reserve. Titles for that subdivision are yet to be issued.

The site has split-zoning, with the proposed activity to occur within both the Township and Settlement zone and Coastal Rural Zone. Bay Road is classified as a Local Road in the 2GP's Road Classification Hierarchy. The campground activity falls within the definition of visitor accommodation which is a restricted discretionary activity in the Township and Settlement Zone and a discretionary activity in the Rural zone.

As an archaeological authority is yet to be obtained from New Zealand Heritage, and earthworks (including small scale) are required to form the vehicle access (stripping of top-soil and refilling with compacted aggregate), the proposal is assessed as a non-complying activity. The proposal is supported by an Integrated Transport Assessment (ITA) prepared by Stantec.

TRAFFIC GENERATION

The ITA notes that in 2016 Opus completed a report titled *Vehicle Movement Surveys for the NZMCA*, which has been used as the basis to calculate traffic generation for the proposed activity. The dataset includes data from the busiest periods for NZMCA activities, which is understood to be about 15% of the year, and a typical lower level of traffic generation during the off-season.

The ITA has assessed the likely traffic generation of the activity and it concludes that the peak hour volumes (upon the Stage 2 development) would be up to 20 vehicle movements per hour and up to 122 vehicle movements per day.

SURROUNDING TRANSPORT NETWORK/ACCESSIBILITY

The details of the transport network within the vicinity of the site are well detailed within the ITA, and therefore need not be repeated in this memorandum. To arrive at the site, it is intended that visitors will approach from the Coast Road/Park Road intersection, will then turn right at the Park Road/Hill Road intersection, turn right again at the Hill Road/Bay Road intersection before reaching the site on the southern side of Bay Road. The same route is intended to be followed in reverse at the termination of a visit.

However, I note that when approaching the site from Dunedin City, Google Maps directs traffic to use Bank Road instead of Hill Road. This raises concerns from a transport perspective because Bank Road encompasses a tight radius corner which is insufficient to safely accommodate two-way vehicle traffic when considering the types of vehicles that will be generated by the proposed activity.

With respect to the surrounding transport network, there are three primary issues that require consideration, these are:

1. The Hill Road/Bay Road intersection, which has poor sight distances and is also unable to accommodate two-way traffic flow for the types of vehicles that will be generated by the proposed activity.
2. The sealed width of Bay Road, which is insufficient to enable two-way traffic flow for large vehicles.
3. The increased potential for large vehicles to use Bank Road instead of Hill Road.

These matters will be assessed below.

Hill Road/Bay Road Intersection:

This intersection is controlled via give-way signage and road markings on the western Bay Road approach, leaving Hill Road and Bay Road (east) with full priority. This is unusual as the turning movement has priority at this intersection, though this is possibly reflected by the fact that the dominant flow of traffic is currently toward and from the Warrington Reserve.

Sight distances for vehicles waiting at the give-way limit line are restricted to about 40m due to the large hedge within the road reserve. Furthermore, large vehicles are required to cross the centreline when turning left into Hill Road due to the small radius corner. The ITA concludes that due to the anticipated low-speed environment at this corner/intersection, that the shortfall in sight distances is not of significant concern from a road safety perspective. This is evidenced by the crash analysis contained within the ITA, which indicates that there have been no reported crashes at this intersection. However, in the context of increased movements at this intersection, particularly by larger vehicles than what is likely to be currently occurring, it is considered that increasing the sight distance will provide safety benefits. This should therefore be done prior to commencement of the activity.

Therefore, as per the requirements of the Dunedin Code of Subdivision and Development 2010, it is recommended that the hedge be removed/altered in order to achieve a safe intersection sight distance of 80m, based on a design speed of 50km/h.

I also acknowledge that increasing the inside radius of the intersection for vehicles turning left from Bay Road onto Hill Road will further assist with the safe and efficient operation of the intersection, considering the types of vehicles that will use it as a result of the proposed activity. This swept-path analysis contained within the ITA clearly indicates that there will be

a vehicle conflict should a right turning campervan/caravan encounter a left-turning turning campervan/caravan at this intersection. However, improving the intersection to alleviate this issue would likely affect the existing vehicle access and garage at 37 Bay Road (which I note is located (in part) within the legal road corridor and for which no resource consent or licence to occupy legal road has been granted).

Given that it is unclear as to the likelihood or frequency of such a conflict occurring, Transport considers that in lieu of requiring these improvements to be undertaken at the outset, a practical approach would be to require that the applicant monitors and reviews the operation of the intersection upon commencement of the activity.

I therefore recommend that the transportation requirements of this activity be reviewed by a suitably qualified transportation/traffic engineer, on behalf of the applicant, upon commencement of the activity. The suitably qualified traffic/transportation engineer must provide a written statement/assessment confirming that the intersection is operating to an appropriate level of safety/efficiency. If it is found that there are operational issues with the intersection, the applicant will be required to make the necessary improvements to ensure that the intersection operates appropriately.

I note that Page 3 of the further information response, dated 3 November 2020, indicates that the applicant considers it appropriate that some additional contribution is made to works required to improve the intersection i.e. vegetation trimming and potentially changes to the inside radius. However, the applicant notes that this should be conditional on the works being implemented by Council within an agreed timeframe. A time frame of one year has been suggested by the applicant.

I consider that in this instance it may not be appropriate for a condition to be imposed on the consent which requires Council to undertake physical works within an agreed timeframe. This is because the applicant would not have control over complying with this condition. I therefore recommend that instead, this matter be subject to an agreement outside of the current resource consent – whereby the costs of this work will be met by the applicant. It should be reiterated that improving the sight distances at the intersection must be done prior to commencement of the activity.

Bay Road Width:

The ITA identifies that Bay Road is of insufficient width to accommodate two-way traffic flow of large vehicles within its current sealed width, which is about 4.8m wide. DCC Transport has reviewed the analysis within the ITA and has confirmed that in addition to the above, that the available width is also insufficient to enable a standard car and a caravan/campervan to pass one another other without one vehicle having to traverse the unsealed shoulder or grass berm on either side of the road carriageway.

Additionally, there is no formal dedicated pedestrian infrastructure on Bay Road and pedestrians are therefore required to walk either on the metalled shoulder on the southern side of Bay Road or on the grass berm on its northern side. As noted, if two large vehicles (or one campervan/caravan and a car) travelling in opposite directions meet on Bay Road (such as the types of vehicles that will be generated by the proposed activity), one vehicle will be required to traverse the unsealed shoulder due to the insufficient sealed width of Bay Road. This means that pedestrians will not be protected from vehicle traffic and may be required to move into the swale drain or narrow grass berm to allow for the passing manoeuvre to take place. In my view, this is a potential safety issue that must should be avoided.

In addition to the safety issues identified above, I consider the insufficient sealed width of Bay Road will also likely increase the potential for excessive shoulder wear and edge-break on Bay Road, and therefore may result in additional unforeseen road maintenance costs to the Council.

On the basis of the above, I consider that Bay Road in its current form is unsuitable to accommodate the type of traffic generated by the development, and improvements options to address the above concerns should therefore be investigated by the applicant's transportation expert prior to any consent being granted.

Bank Road:

As noted, Google Maps directs vehicle traffic to both approach and leave the site via Bank Road, not Hill Road as promoted within the application. This matter was not addressed within the original ITA submitted with the application, and regardless of any signage installed to direct traffic to use the preferred route, Transport remains concerned that NZMCA visitors may choose to use Bank Road instead of Hill Road, as directed by Google Maps.

A condition could be imposed on the consent requiring NZMCA members to arrive at the site using the Hill Road route, instead of the Bank Road route, however, I consider this may be difficult to monitor and due to the above, there remains potential that visitors will opt to follow the route recommended to them by GPS programmes instead.

SITE ACCESS:

There are currently two options for access. Option 1 would be via Esplanade and then via the reserve/existing unsealed vehicle access to the treatment ponds. This is not the preferred option from the applicant's perspective.

Option 2 would be directly from Bay Road, via the site's leg-in. This is the preferred option from the applicant's perspective. As Option 2 has been selected by the applicant as the preferred option, this is the only option that has been assessed by Transport.

The vehicle access will include provision for a security gate, which will need to be recessed from the edge of the road to allow for a vehicle to queue within the site. A condition is recommended to that effect.

The applicant does not propose to hard surface the entirety of the vehicle access. Instead, it is proposed to hard surface the access from the edge of Bay Road to a distance of not less than 5.0m inside the property boundary.

The vehicle access will comply with Rule 6.6.3.6.a, which requires the vehicle access to be hard surfaced from the edge of the seal of Bay Road toward the property boundary for a distance of not less than 5.0m. However, I note that Rule 6.6.1.5.a requires parking areas (including associated access and manoeuvring areas for non-residential activities) to be hard surfaced and adequately drained for their duration). Therefore, in my view, the entirety of the vehicle access is required to be hard surfaced as per Rule 6.6.1.5.a. This matter will be assessed in more detail below, but in light of this requirement I consider that the hard surfacing should be extended to a distance of at least 15.0m inside the property boundary, not 5.0m as currently proposed.

In my view, given that the vehicle access will be used more intensively than a standard residential access, and also by heavier vehicles, I consider that there is increased potential for loose material to migrate onto Bay Road. Increasing the distance of hard surfacing will mitigate this issue.

The access will be formed to a minimum width of 6.0m, representing compliance with Rule 6.6.3.9.a.iii. A condition is recommended to ensure that the vehicle access is formed to an appropriate standard.

PARKING AND MANOEUVRING:

The camping ground has been configured to provide individual sites that are 6m wide and 13m deep, which the ITA states is sufficient to accommodate all anticipated vehicle types while also providing separation from adjacent vehicles. Upon request for further information, the applicant has provided a swept-path analysis which indicates that all spaces can be negotiated by the anticipated vehicles (including an 85th percentile car towing a campervan trailer). Upon consideration of the swept-path analysis, I consider the dimensions of the parking area/camping ground to be appropriate in this instance.

Rule 6.6.1.5.a requires parking areas (including associated access and manoeuvring areas) provided for any activity other than standard residential to be designed with appropriate stormwater drainage, hard surfaced and individual parking spaces permanently marked (and mobility parking provided where necessary). The proposal fails to comply with this requirement. The applicant proposes to retain the existing grass cover over the site, citing that the existing rural character within the coastal setting is what makes this site appealing. The applicant considers that requiring the entirety of the access, parking and manoeuvring areas to be hard surfaced would have adverse effects on the existing rural character and coastline amenity. In addition, the applicant aims to avoid ground disturbance wherever possible due to the risk of disturbing or uncovering heritage artefacts.

The existing soil structure has been assessed by a suitably qualified geotechnical engineer, which confirms that with appropriate design, a suitable pavement structure will be able to be constructed, making the vehicle access, parking and manoeuvring areas fit for purpose in this instance.

Based on the site-specific circumstances, it is considered that the proposal to not hard surface most of the vehicle access (except for the first 15.0m), parking and manoeuvring areas is appropriate. This is primarily supported by the geotechnical advice provided by the applicant, which indicates that with appropriate design, rotation of the use of the parking areas (to ensure even pavement loading across the site) and ongoing maintenance, that the effects of this breach will be contained with the site and are therefore acceptable.

With respect to the section of the vehicle access that is to be shared between Lots 1 and 2 SUB-2018-148, it will be important in this instance to ensure that a robust maintenance agreement is drawn up between the owners/users, to ensure that their maintenance responsibilities are clarified. This is particularly the case considering a metalled surface will require additional maintenance (i.e. replenishment of wearing course and regrading to ensure that the formation remains free of potholing and that drainage continues to operate satisfactorily).

In that regard, the processing planner may wish to consider whether the owner (or prospective owner) of Lot 1 SUB-2018-148 is affected by the proposal to not hard surface what

will become a shared vehicle access between Lots 1 and 2 SUB-2018-148, in breach of Rule 6.6.1.5.a.

Rule 6.6.1.6 will also be breached, which requires this parking area to be suitably lit. Similar to the issues with hard surfacing the vehicle access and parking areas, the applicant considers that implementation of artificial lighting will erode the rural character of the site, and notes that this is not a typical parking area within an urbanised setting. I consider this to be reasonable considering the site-specific issues at play.

CONCLUSION

From a Transport perspective, the proposal is considered to be finely balanced. It is evident that minor improvements will likely be required to the Hill Road/Bay Road intersection, primarily to improve sight lines but also potentially to improve the overall operation of the intersection (once a review has taken place) given that it will be used by larger vehicles generated by the proposed activity.

While Transport is satisfied that the issues associated with this intersection can be addressed, we remain concerned about the standard of Bay Road in the context of this proposal due to its formed width and lack of protection for vulnerable road users. Similarly, we remain concerned about the increased potential of large vehicles to arrive/leave the site via the Bank Road route (as directed by Google Maps), as opposed to the Hill Road route promoted within the application.

On that basis, Transport considers that the potential effects of the proposal on the transport network may be more than minor, and we therefore recommend that the issues raised in this memorandum are further considered by the applicant's transport expert, and for them to offer suitable mitigation measures.

The above notwithstanding, the below conditions are likely to be recommended on any consent granted, with the caveat that additional conditions will likely be necessary following a further review of the proposal by the applicant's Transport expert.

CONDITIONS:

- (i) It is recommended that the hedge located at the Hill Road/Bay Road intersection be removed/alterd in order to achieve a safe intersection sight distance of 80m, based on a design speed of 50km/h.
- (ii) The transportation requirements of this activity must be reviewed by a suitably qualified transportation/traffic engineer, on behalf of the applicant, upon commencement of the activity. The suitably qualified traffic/transportation engineer must either certify that the intersection is operating to an appropriate level of safety/efficiency or propose and implement the necessary improvements to ensure that the intersection operates appropriately.
- (iii) The vehicle access must be a minimum 6.0m formed width, hard surfaced from the edge of the Bay Road carriageway to a distance of not less than 15.0m inside the property boundary and be adequately drained.
- (iv) A vehicle queuing space must be provided for a length of at least 15m inside the property from the boundary with Bay Road.
- (v) The vehicle crossing, between the road carriageway and the property boundary must be constructed in accordance with Council's Industrial Specification for Vehicle Entrances.

- (vi) The surfacing/pavement design for the remainder of the vehicle access, parking and manoeuvring 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.

ADVICE NOTES:

- (i) It is advised that alterations/removal of the hedge at the Hill Road/Bay Road intersection be subject to a side agreement between the Council and the applicant.
- (ii) It is advised that the processing planner may wish to consider whether the owner (or prospective owner) of Lot 1 SUB-2018-148 is affected by the proposal to not hard surface what will become a shared vehicle access between Lots 1 and 2 SUB-2018-148, in breach of Rule 6.6.1.5.a.
- (iii) 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/upgraded in accordance with the Dunedin City Council Vehicle Entrance Specification (note: this approval is not included as part of the resource consent process).
- (iv) It is advised that a formal agreement be drawn up between the owners/users of all private accesses in order to clarify their maintenance responsibilities.