

UNDER

the Resource Management Act 1991
("RMA")

IN THE MATTER

of an application under section 88 of the
RMA for consents for a 'worker
accommodation' development at 1044
Brighton Road, Brighton, Dunedin ((LUC-
2022-177)

**STATEMENT OF EVIDENCE OF CONRAD STEWART ANDERSON ON BEHALF OF
GK ACCOMMODATION LIMITED**

1. INTRODUCTION

- 1.1 My name is Conrad Anderson, and I am a director of Anderson & Co (Otago) Limited, a planning/resource management firm based in Dunedin.

Qualifications & Experience

- 1.2 I hold a Masters in Planning from the University of Otago. I have over 9 years of professional experience in planning, and I am a member of the New Zealand Planning Institute.

Involvement in the Proposal

- 1.3 My involvement in the Proposal (the development of worker accommodation and associated matters) has included the following:

- (a) Preparing the Assessment of Effects ("**AEE**")
- (b) Meetings with the Dunedin City Council ("**DCC**") staff, and preparing the sequent amendments to the application.
- (c) Meeting with members of the public and some of the submitters.
- (d) Review of the Section 42A report ("**s42A Report**").

- 1.4 I have visited the site on multiple occasions, and I am familiar with the surrounding area.

Scope of Evidence

- 1.5 Both my AEE and the s42A Report provide a comprehensive assessment of the Proposal against the statutory framework of the RMA. The key matters of disagreement are largely associated with effects, rather than policy matters.
- 1.6 As a result of various meetings, the details within the s42A Report, and submissions received, the Applicant wishes to amend the application.
- 1.7 The following will initially outline the amendments to the application, then focus on the effects headings used in the s42A Report.

Code of Conduct

- 1.8 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2014. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.
- 1.9 As I am relying on my AEE and the s42A Report I have deliberately not included a full planning analysis in this statement.

2. BACKGROUND TO THE APPLICATION

- 2.1 The background to the Application is summarised as follows:
 - (a) From the late 1980's the site has been associated with a caravan/camper van park (supported by a small number of accommodation cabins, shared facilities, and a managers dwelling). That activity is authorised via resource consents.
 - (b) The Applicant purchased the site in early 2022, at which time the caravan/camper van park activity ceased operating.
 - (c) The shareholders of the Applicant are associated with a plumbing business, which has the ability to sub-contract to large construction projects.
 - (d) The activity proposed by this application is for worker accommodation for out-of-town construction workers.

- 2.2 Subsequent to the Application being lodged with Council, the initial decisions associated with the 2GP Variation 2 have come into effect. These include the removal of the 3 month limitation associated with visitor accommodation. This was done to provide greater housing choice¹. This is relevant in the event this application is declined.

3. DESCRIPTION OF THE SITE AND THE ACTIVITY

- 3.1 A description of the site and the activity is provided in the AEE and the s42A report, and does not need to be repeated, noting the following seeks to amend the application.

4. AMENDMENTS TO THE PROPOSAL

- 4.1 Following a public meeting, the receipt of the submissions, meetings with some submitters, and the receipt of the s42A Report, further consideration to the proposal has been undertaken. That consideration has resulted in a number of amendments, however, the underlying activity, as applied for, remains.

- 4.2 The amendments are discussed below under the following headings:

- (a) Access
- (b) Manoeuvring for Emergency Vehicles
- (c) Planting
- (d) Outdoor Areas
- (e) Shared Space
- (f) Parking
- (g) Service Area
- (h) Number of Units
- (i) Consent Duration
- (j) Management
- (k) Setback from Network Utilities

¹ s42A Report, para 48 (see page 11 of the agenda).

Access

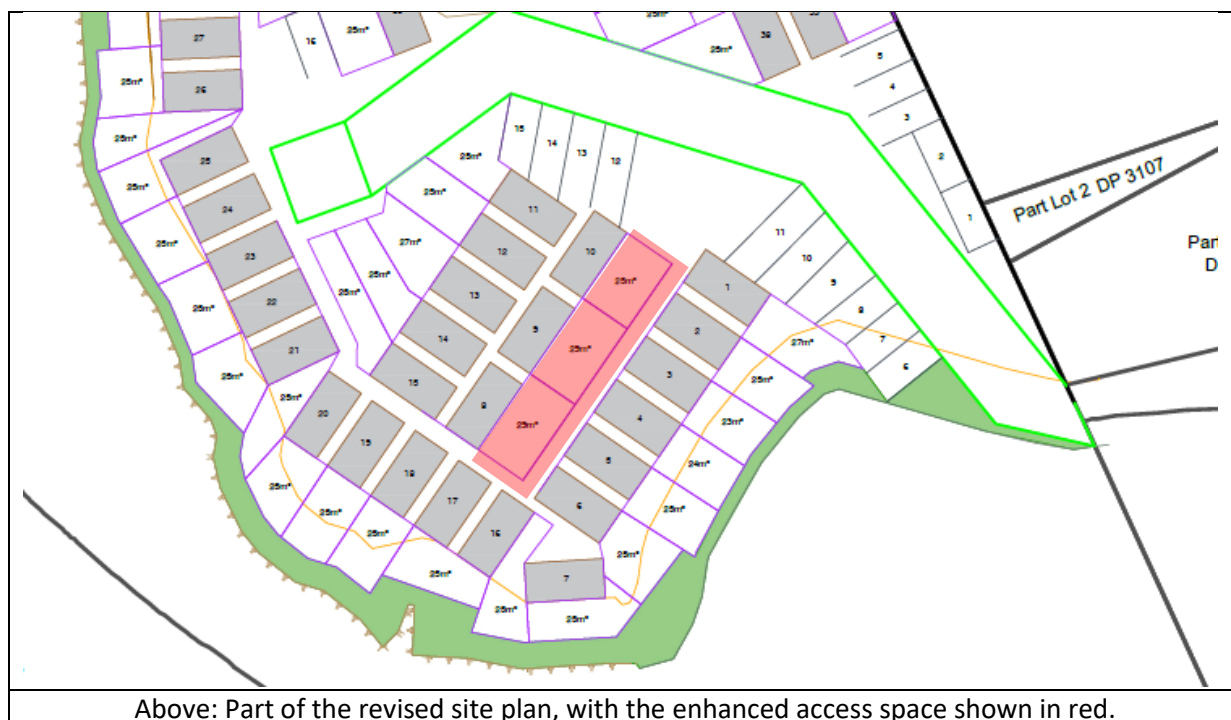
- 4.3 The s42A report has raised the matter about the site access width (s42A Report at paragraphs 142 to 148, agenda page 33). At the site boundary the access is 5m wide², consisting of 3m of road reserve and 2m of land owned by Toitu Te Whenua Land Information New Zealand (“LINZ”).
- 4.4 A request has been made to Colliers, as agent for LINZ, to secure an access agreement. At the date of completing this evidence, a reply is pending.
- 4.5 The s42A report suggests a condition to manage this matter. That proposed condition is acceptable to the Applicant, with a minor change (as per Appendix 1, attached to this evidence – see condition 28).
- 4.6 The proposed condition 28 should ensure there are no access concerns post implementation.
- 4.7 In addition to the above, DCC Transportation has been contacted regarding the possibility to install traffic calming measures on the road reserve to slow traffic exiting the site, such as stop sign, or speed bump or similar. At the date of completing this evidence, discussions are continuing.

Manoeuvring for Emergency Vehicles:

- 4.8 Following an on-site meeting with a representative from Fire and Emergency New Zealand (“FENZ”), the key matters were refined to: the ability to turn a ‘pumping appliance’³ (turning via a 3 point turn was indicated to be acceptable), and for emergency personnel to have enhanced access to the proposed units.
- 4.9 To accommodate the above, the site plan has been amended as follows:
- a. Within the central/southern part of the site, the layout of the units has been amended to ensure most units face an internal open space area. On the revised layout, this has created an non-vehicle emergency access way between units 1 to 6 and units 8 to 10 – refer below (i.e. generally speaking, on the plans lodged with the application, units 8-13 have been moved away from units 1-7).

² All measurements associated with the access are approximates.

³ Manoeuvring for an aerial appliance is not required, as all buildings are single level.



- b. A unit to the north of the Council owned pump station has been removed (this was unit 41 on the plans lodged with the application), to provide non-vehicle access to the north part of the relevant area. Also, the north side of the pump station is currently used by Council for access to the pump station; however, that area is not within the access easement. The revised layout provides the required access to the pump station.
- c. In terms of a turning area for a pumping appliance, attached are manoeuvring diagrams for an 8m rigid truck⁴, which has an outer wheel radius of 11.3m in accordance with F5-02 GD (see footnote below). The driveway to the existing dwelling provide an area for a 3 point turn manoeuvre. To ensure that the required area remains available, no barrier is to be installed on the driveway to the existing dwellings which would restrict the turning manoeuvre.
- d. In case of necessity, an alternative 3 point turn area is also provided (this area will primarily serve as an outdoor living area, with no fixed structures).

⁴ As per <https://www.fireandemergency.nz/assets/Documents/Business-and-Landlords/Building-and-designing-for-fire-safety/F5-02-GD-FFO-emergency-vehicle-access.pdf>

- e. The updated site plan shows the required manoeuvring spaces, and manoeuvring diagrams are attached.

Planting:

- 4.10 Following an on-site meeting with a representative from Otokia Creek & Marsh Habitat Trust, the Applicant wishes to amend the application, via the inclusion of a planting area along the creek bank.
- 4.11 A consistent planting strip was initially considered, but that resulted in some internal challenges with regards to the site layout. For that reason, it is proposed the planting area is less rigid in shape, covering over 225m², with the planting width varying between 1m and 4.5m. With the exceptions being the space adjacent to car park 6 and the space adjacent to the start of the drive.
- 4.12 The varying width will allow for a more natural planting arrangement, while continuing to ensure there is planting along the entire edge, combined with areas of more substantial plantings.
- 4.13 The suggested condition from the s42A Report has been updated to reflect the above (as per Appendix 1, attached to this evidence – see condition 26).
- 4.14 In terms of the desire for internal planting, for practical purposes, minor changes to the proposed condition is sought. See Appendix 1, condition 26).

Outdoor Areas:

- 4.15 As originally proposed a number of the units had less than the required outdoor amenity space. The now proposed planting along the creek bank impacts on the outdoor areas of the units closest to the creek.
- 4.16 However, the site plan has been successfully amended to provide for planting on the creek bank, while also increasing the outdoor spaces. Only two units now have less than the required 25m², being unit 3 (23m²) and unit 4 (24m²). Given the close compliance, the creek bank planting and the now proposed shared spaces (see below); the outdoor spaces quantum have a very limited effect.

Shared Space:

- 4.17 As originally proposed no shared space was to be provided. However, following comments from submitters and Councils experts, the benefit of such spaces is now better understood.
- 4.18 For the above reasons, two shared spaces are now proposed as follows:
- (a) At the western end of the existing building is a covered semi-open space (circa 35m²). This area is to be converted to a covered shared space. This will be adjacent to the community facilities, and faces into the site.
 - (b) As noted above under the heading 'Manoeuvring for Emergency Vehicles' an alternative 3 point turn area for emergency vehicles is provided. That area is to be an open space, and will serve as second shared space. To ensure the space is available in emergencies, the following will apply to this area:
 - (i) No vehicles are to be parked on it (managed via signage and the onsite manager).
 - (ii) No permanent fencing is to be erected on/around it.
 - (iii) No items are to be permanently fixed to the ground.
 - (iv) No items are to be left on the area that weight over 40kg.
- 4.19 The above will provide an open area (circa 80m²), which can be used as a shared space, but also will be readily available for the turning of emergency vehicles as required.
- 4.20 It is noted that a potential concern with the provision of shared spaces is noise. The s42A Report indicates that with "appropriate on-site management...this potential effect ... can be managed..."⁵. The matter of on-site management is discussed later in this evidence.

⁵ S42a Report, para 99, page 25 of the agenda.

Parking:

- 4.21 The revised site plan now provides 16 parks, with a number of the parks being suitable for longer vehicles, such as park 1 (6m), park 5 (8m), park 10 (7m), and park 11 (8m). A 21 seater vehicle is general 7-8m long, while a 12 seater van is generally 5-6m long.
- 4.22 Following various discussions, there seemed to be comfort with 4 van parks and 12 car parks. The proposal now aligns with those numbers.
- 4.23 A review condition in terms of parking outside the site is continued to be supported.

Service Area:

- 4.24 Implementing 25m² of outdoor open space for unit 40 has resulted in the service area reducing from 20m² to 13m². This is located to the west of the outdoor area for units 36 and 37 (Noting the service area is not marked on the updated plan).
- 4.25 If the area proposed for the service area is found to be too restrictive, then additional service areas can be created by relocating one of the proposed car parks to the garage beside the existing dwelling. This is not considered problematic, as the garage is a 4 car garage, which will be beyond the requirements for the site manager.

Number of Units:

- 4.26 The revised site plan provides for 40 units, which represents a significant reduction from the originally proposed 46. The reduced number of units assists with the various matters such as planting area, shared space, emergency access and car parking. Any further reduction in the number of units is likely to frustrate the proposal.

Consent Duration:

- 4.27 The topic of a timeframe for the consent has been raised by submitters and within the s42A Report. As a result the Applicant is offering a duration period of 12 years.
- 4.28 The requested duration, provides some flexibility, as the management of large construction projects is not within the control of the Applicant.

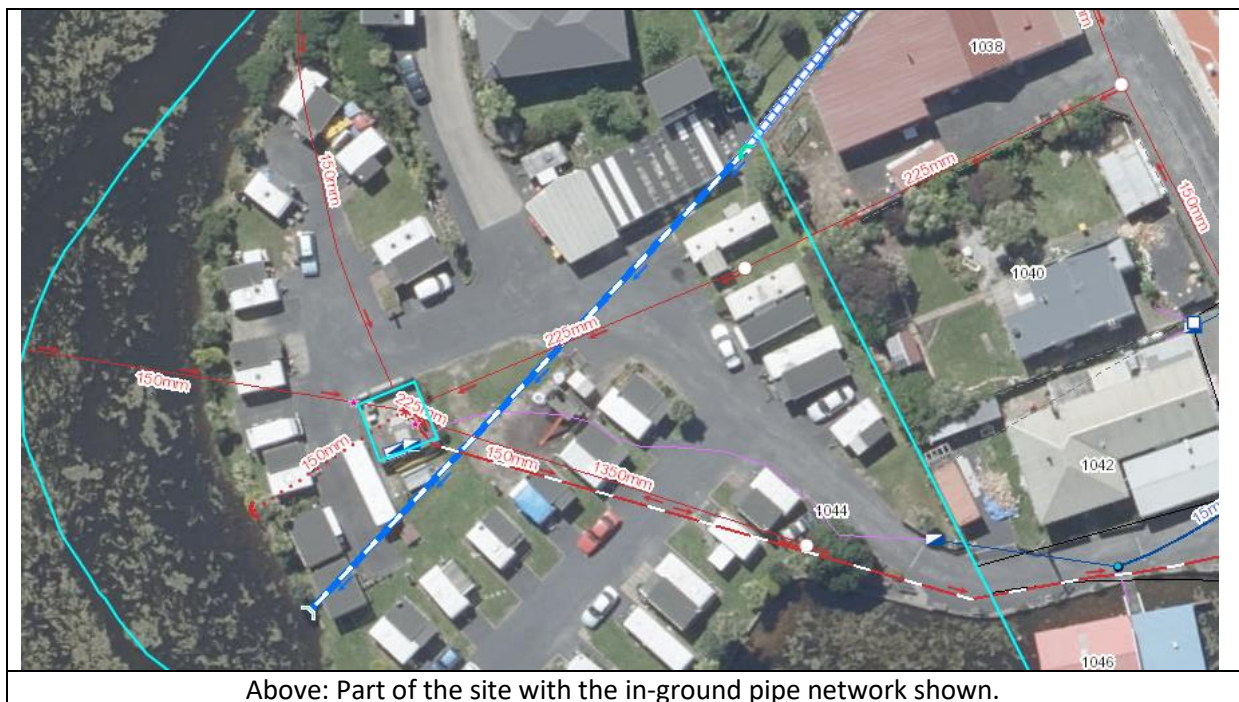
- 4.29 Prior to the end date of the resource consent, the units established as part of this resource consent are to be removed, unless a further resource consent is obtained.

Management

- 4.30 In terms of management, Appendix 1 of the s42A Report includes a number of conditions under the heading 'General', and these are agreeable to the Applicant.
- 4.31 Further, a Site Management Plan is proposed, with draft conditions attached to the s42A Report. These have been reviewed, and suggested amendments made (see appendix 1 of this evidence).

Setback from Network Utilities

- 4.32 Within the site is a Council owned waste water pump station, which has 7 connecting pipes (6 water water, and 1 water). Also crossing the site is a stormwater pipe. Refer below:



Above: Part of the site with the in-ground pipe network shown.

- 4.33 To implement the proposal, minor earthworks will be required for matters such as piles and trenching of services. Performance standard 8A.3.2.1.e (Setback from network utilises) links to Rule 8A.5.6, which requires compliance with Rule 5.6.2. Rule 5.6.2 requires earthwork setback of 2.5m from water mains and 1.5m from all other network utility structures. While the exact location of piles and services is not yet known, the proposal will not comply with the required setbacks. In keeping with

Rule 5.6.2.2 the proposal is a restricted discretionary activity. The amended application now seeks to include this matter.

4.34 The relevant assessment matters are within Rule 5.7.4, with the matters of discretion limited to (a) effects on health and safety and (b) effects on efficient and effective operation of network utilities.

4.35 To ensure there are no effects of concern, all existing in-ground infrastructure will be located prior to earthworks beginning and all the proposed units will be transportable (which will assist if future access is required). Further it is understood Council is planning to move some of the existing in-ground infrastructure to the existing easement, which will reduce the number of setback encroachments.

5. CONSENTS REQUIRED AND APPLICATION STATUS

5.1 The AEE and the s42A Report identifies the consents required and overall activity status of the Proposal. The proposed amendments do not change the reasons for a resource consent (save for the matter of the earthwork setback from network utilities, which is discussed above), nor its activity status.

6. ENVIRONMENTAL EFFECTS

Permitted Baseline

6.1 The s42A Report⁶ considers it is useful to consider the 'plausible' residential development, which is discussed in paragraphs 72 to 75 of the s42A report Pages 19 to 20 of the agenda). While there is a differing of opinion what a 'plausible' residential development could extend to, at a minimum the s42A Reports suggest this is 10 residential units. Those 10 units, plus the managers dwelling and the sleep outs, the result could be 40.5 to 42.5 people living onsite.

6.2 The amended proposal will result in 43.5 people (being 40 in the units, and 3.5 in the dwelling)

⁶ s42A Report, para 71, page 20 of the agenda.

Receiving Environment

6.3 The consented environment, which has been given effect to, includes: 20 caravan/campervan parks, 2 accommodation cabins and a managers dwelling.

6.4 Further, the following is noted:

(a) The 2GP no longer includes a time limitation associated with visitor accommodation.

(b) The consented environment does not:

(i) Time limit a persons stay, nor

(ii) Require any caravan/camper van to be road legal.

6.5 The relevance of the above is that 20 larger two bedroom units could be placed on wheels, parked as per the historic consented plan, and utilised. Those 20 units, along with the managers dwelling and the two cabins could provide accommodation for 45.5 to 47.5 people.

6.6 As noted in the s42A Report (paragraph 48, page 11 of the agenda) the removal of the time limitation associated with visitor accommodation sought to provide “greater housing choice”.

6.7 The use of 20 larger two bedroom units on wheels is not fanciful, as it represents the ‘fall back’ position if this application is declined. It also aligns with Councils rationale in terms of removing the time limit from visitor accommodation.

Density:

6.8 The table below provides a summary:

		Number of ‘Units’	Number of people ⁷
Proposal	Managers dwelling, 40 one person units	41	43.5
‘Plausible’ residential development	Managers dwelling minimum of 10 residential units, 2 sleep outs	11	Between 40.5 and 42.5
Consented environment	Managers dwelling, 20 Caravan parks ⁸ , 2 sleep outs	21	Between 45.5 and 47.5

⁷ Assumes 3.5 people in the managers dwelling, and if applicable 2-4 people in the sleep outs.

- 6.9 In terms of the density of people, the above provides an indication of how close the proposal is to both a 'plausible' residential development and the consented environment. People result in effects associated with matters such as noise, behaviour, safety, parking and so forth.
- 6.10 In terms of the density of residential units, the proposal exceeds both the 'plausible' residential development and the consented environment by some margin. However, this is somewhat off-set by the limited size of the units. The density of units results in effects associated with matters such as the built environment and so forth.
- 6.11 As noted in the s42A Report, the effects resulting from density runs through the assessment of effects⁹, which are discussed below.

Effects on Surrounding Amenity Values and Character

- 6.12 Within paragraphs 85 to 93 of the s42A Report (refer pages 21 to 23 of the agenda) focuses on 'streetscape amenity and character', and 'amenity of surrounding sites'. Each of these is discussed below:

(a) Streetscape amenity and character:

- (i) The conclusion at paragraph 88 (s42A Report, page 22 of the agenda) is that the "*proposed development will have relatively low visual effects on existing streetscape amenity and character*". This is noted.

(b) Amenity of surrounding sites:

- (i) The conclusion at paragraph 89 (s42A Report, pages 22 to 23 of the agenda) is that subject to mitigation measures, such effects could be kept to a low level. Comments in terms of the suggested mitigation are below:
- Painting units a visually recessive colour: The application already includes the offer to paint the unit roofs with colours approved by Council. This could be extended to the exterior walls which face the creek. However, painting walls which are

⁸ Assumes 2 people per caravan park.

⁹ s42A Report, para 84, page 21 of the agenda.

internal to the site would seem to have limited additional benefit (in terms of amenity to surrounding sites).

- Providing additional planting: The application has been amended to provide planting along the creek boundary (225m²). In addition, the suggested condition for internal planting of 1 tree per every 4 units is agreeable.
- Increase the extent of open space which is uncluttered by buildings. The application has been amended to provide for fewer units, increased open space towards the northern end (via the removal of the unit formally numbered 41) and increased open space associated with the shared open space area.

6.13 In terms of the potential re-launch of the Brighton Boat Shed (refer s42A Report, para 93, page 23 of the agenda), the proposed boundary plantings will be beneficial to the users of the creek.

6.14 In terms of the matters raised by Council's Parks and Reserves Department ("**PARS**"), the matter has been included in the draft conditions (condition 6) to which the Applicant is agreeable to.

On-site Amenity for Residents:

6.15 To support the individual outdoor spaces associated with each unit, communal outdoor amenity space was suggested (refer s42A Report, para 96. Page 25 of the agenda). As noted earlier in this evidence, two shared spaces are now proposed, one covered, and one uncovered. In addition, the outdoor spaces associated with the individual units have generally increased, with those towards the creek edge, enjoying an additional visual space provided by the proposed planting area.

6.16 In terms of the layout of the units, the following is noted:

- (a) Access to the units has been enhanced (which also aligns with comments from FENZ). This also results in a reduction of 'blind spots'.
- (b) The revised layout generally provides greater separation between outdoor spaces and adjacent units.

- (c) The idea of clustering the units was considered however, due to the various constraints (setback from the creek, setbacks between units, access requirements of FENZ, the minimum number of units required and so forth) this could not be achieved. However, due to the other enhancements, the proposed layout (rather than clusters) is considered to provide enhanced on-site amenity for residents.

6.17 In terms of ensuring the layout is not used for long-term housing, the following is noted:

- (a) The application is specially to provide accommodation for out of town workers.
- (b) Units will not be leased individually.
- (c) If the requested resource consent is granted, that will not provide for the use of the units for long term housing i.e. there will be no legal basis for use a use.
- (d) An end date to the resource consent is now proposed.

Biodiversity and Natural Character

6.18 The consented environment provides for:

- (a) A number of caravan parks/cabins within 5m of the creek. The proposal results in an enhanced outcome in terms of setback from the creek, with 75% of the units adjacent to the creek having a setback greater than 5m.
- (b) No conditions associated with planting on/near the creek edge. The application now includes planting along the entire frontage area (except near car park 6 and the start of the access).

6.19 In terms of biodiversity and natural character, the proposal is beneficial when compared to the existing and consented environment.

Noise:

6.20 The suggested Noise Management Plan is acceptable to the Applicant.

Provision of Stormwater, Water and Sewerage

6.21 The details at paragraph 120 of the s42A report (see agenda page 29) does not consider the plausible situation of 20 two person caravans, plus 2 sleep outs. Assuming the 2 sleep outs are limited to 2 people each, then waste flows from the permitted environment could be:

(a) 2 people per unit x 288 l/day (from Mecalfe and Eddy) = 576 l/day/unit.

(b) 576 l/day/unit x 22 units (20 caravans + 2 cabins) = 12,672 l/day for all units.

(c) 12,672 l/day / 1440 minutes/day = 8.8 l/minute

6.22 In terms of the amended application (40 one person units) the waste water flow would be:

(a) 365 l/day/unit x 40 units divided by 1,440 minutes/day = 10.1 l/minute.

6.23 The above indicates the waste water flows from the proposal would be less than 15% more than the permitted use of the site. Noting the actual flows:

(a) Could be decreased via the requirement to install low flow devices.

(b) Will be decreased via the proposed condition of consent requiring uniforms and bedding to be washed offsite.

6.24 As noted in the s42A report there is existing capacity in the network (paragraph 121, page 29 of the agenda) and that the now offered time limitation will assist in terms of future capacity demands.

6.25 The suggested condition for a SWMP is agreeable.

Transportation:

6.26 With regards to access, a condition of consent is now offered (refer earlier in this evidence).

6.27 With regards to parking:

(a) 16 parks are now provided (4 for vans, 12 for cars).

(b) The Applicant continues to offer a condition in regards to exclude parking on the road.

(c) The offer of a condition to review off-site parking remains.

- 6.28 With regards to Fire Engine Access, engagement with FENZ has been undertaken, which indicated the proposed turning areas would be acceptable.

Rubbish Collection

- 6.29 The offered condition of consent for onsite and private management of rubbish and recycling remains.

Natural Hazards

- 6.30 The key matters with regards to natural hazards that are raised in the s42A Report (paragraphs 152 to 165, pages 34 to 38 of the agenda) are associated with the activity being temporary, the buildings being transportable and the site being a managed site. The application now aligns with all these matters.

Public Health and Safety

- 6.31 In terms of the submission from FENZ, the amended layout provides for enhanced access to the proposed units and onsite manoeuvring.

Positive Effects

- 6.32 The consented environment could provide accommodation for 40+ people, with no requirements in terms of matters such as:

- (a) The colours of structures
- (b) Planting along the creek bank
- (c) Internal planting
- (d) Site Management
- (e) Community liaison requirements
- (f) Complaints resolution process
- (g) Requirements in terms of residents health and safety in respect to living away from home
- (h) Rubbish and recycling to be collected from within the site.

- 6.33 Compared to the consented environment the proposal provides significant positive effects, both internal and external to the site.

Effects Assessment Conclusion

- 6.34 The submissions and the s42A Report, along with discussions with some submitters, have provided valuable. As a result the proposal has been significantly amended, while retaining both the underlying activity as well as a desired level of activity.
- 6.35 While not all matters raised by submitters or within the s42A Report, such as the clustering of units, have been implemented, it is felt the amendments have assisted to further reduce the level of effects.

7. OBJECTIVES AND POLICIES ASSESSMENT

- 7.1 Both the AEE and the s42A Report conclude that the original application was not contrary to the policy direction. The proposed amendments will further assist in that regard.
- 7.2 For the above reason, there is limited benefit in reviewing the policy matters in this evidence.

8. DECISION MAKING FRAMEWORK

Overall Assessment

- 8.1 As per the AEE and the s42A Report, the proposal passes the policy gateway.
- 8.2 While my AEE expressed the view that the proposal passed the effects gateway, that was not the conclusion of the s42A report. However, we are hopeful that with the now suggested amendments that conclusion may be revisited.
- 8.3 Notwithstanding that above, the proposal continues to pass one of the limbs in s104D RMA.
- 8.4 In terms of effects, the following is noted:
- (a) The proposed density of people is similar to the consented environment.
 - (b) The input from submitters and the s42A report have been helpful to refine the proposal, which in turn has assisted in terms of effects.

- (c) The proposal offers a number of beneficial effects, both internally and externally.

9. CONDITIONS

- 9.1 It is appreciated that the s42A Report included draft conditions. Suggested revisions are attached in Appendix 1.

10. CONCLUDING COMMENTS

- 10.1 The proposal has been refined due to the input of the submitters, the s42A Report and discussion with various parties. The resulting refinements provide additional certainty, as well as an enhanced outcome.
- 10.2 The proposal will result in the enhanced use of the land resource.
- 10.3 A number of the proposed elements provide benefits over and above the consented environment.
- 10.4 There are no policy matters of concern, the effects have been mitigated, and the positive benefits identified.
- 10.5 The purpose of the RMA is to promote the sustainable management of natural and physical resources. Granting this application is assessed as being consistent with that purpose.

Conrad Stewart Anderson

15/11/2022

Appendix 1: Proposed Conditions - revised

(underline / strikethrough indicate changes from those attached to the s42A Report)

General

1. This resource consent will lapse after 12 years. Prior to the lapse date all the units established as part of this resource consent are to be removed, unless a further resource consent is obtained.
2. The facility must have an on-site Manager who resides on the site.
3. The Manager's contact details will be provided to adjacent neighbours, and clearly displayed at the site entrance.
4. The role of the Manager includes: being the first point of contact, community liaison, and to implement and maintain the Site Management Plan (see below).
5. The individual residential units must not be rented or leased separately.
6. The one-bedroom residential units may accommodate a maximum of 1 person, and there is to be no 'motelling' of units (i.e. generally the units are to be allocated to specific individuals, who can return to the same unit upon returning from leave).

Site Management Plan (note – due to the number of proposed changes to the Site Management Plan conditions, the changes are not tracked)

7. Prior to the implementation of this resource consent, the consent holder shall provide a Site Management Plan for approval by the Resource Consents Manager to rcmonitoring@dcc.govt.nz.

The Site Management Plan must include the following:

Management Protocols: The following management protocols are to form part of the managers roles/responsibilities:

- The Manager is to be readily contactable by both onsite residents and the general Brighton community. All voicemails and emails are to be acknowledged within 2 days.
- The Manager is to hold community liaison meetings. The first meeting is to be within 1 month of the Manager starting, then at least every 2 months. After

3 meetings, any further meetings will be at the request of the community, and are to be arranged within 10 working days of a request being made in writing to the Manager. The maximum number of community liaison meetings is to be 6 per calendar year.

- The Manager is to seek to resolve any matter raised within 14 days, with a reply in writing being sent to the person who raised the matter.

Resident Protocols: Resident Protocols are to form part of the induction process of all residents, and each individual resident is to sign a copy of the protocols acknowledging they have received, read and understood the Residential Protocols. The protocols are to include at least the following.

- Measures for mitigating noise from the site and its residents on adjoining residential occupiers;
- The procedure for dealing with any disorderly behaviour from residents and their guests;
- Information about the Council's requirements/expectations regarding use of the local Brighton reserves as set out in the Reserves Management Plan: General Policies.
- Information about the requirements/expectations in regards to parking of vehicles in the public domain within Brighton, which is to align with the conditions of this resource consent.
- Visitors are permitted, but only under the following conditions: prior permission has been given by the Manager, the visitors are to sign-in upon arrival (which includes agreeing to abide by the relevant protocols), and visitors are only allowed on the site between 8am and 10pm.

General Protocols are to be documented and include at least the following:

- Security is to include a security camera which record movements at the site entrance 24 hours/day for 7 days/week, with footage stored for at least 14 days.
- The employer of the people living on-site is to have a staff health policy relevant to staff living away from their normal homes. A copy of which is to be made available to all residents upon their arrival, along with an information booklet that

discusses the common challenges faced by workers who are working away from home for an extended period, along with the contact details for agencies that provide support that may be helpful to residents (i.e. agencies that assist with anxiety, stress and other mental health issues).

- All residential are to have the ability to access internet services, which is to be at least at a reasonable connection speed.
- Measures to mitigate the effects of noise from established activities on adjoining sites, on residents of the workers accommodation;
- Emergency and evacuation procedures to manage events such as fire, flooding and tsunami;
- All rubbish and recycling is to be stored onsite, with collection completed within the site site.
- Procedures for ensuring the site and outdoor amenity areas remain in a tidy condition.
- Measures to ensure that unimpeded access to the Council's wastewater pumping station is maintained at all times.
- A community notice board is to be erected within the covered shared space. This is to include notices for:
 - Contact details for the local doctor and counsellors.
 - Contact details for agencies that provide support that may be helpful to residents (i.e. agencies that assist with anxiety, stress and other mental health issues).
 - Recreational opportunities in the immediate area.
 - A list of local clubs and societies, along with contact details.
- A regular unit cleaning service is to be provided.
- No vehicles are to be used on the site between 10pm and 6am.

Transportation

8. The surface of all parking, associated access and manoeuvring areas must be formed, hard surfaced and adequately drained for their entirety, and parking spaces permanently marked in accordance with the application plans.
9. Parking spaces must be clearly marked and no parking may take place outside these designated parking areas. Outdoor amenity spaces may not be used for vehicle parking.
10. The largest passenger vehicle used on the site must have a seating capacity no larger than 21 seats.
11. The car parks must be permanently marked and must comply with the minimum dimensions stipulated in Rule 6.6.1 of the 2GP District Plan.
12. Sufficient manoeuvring space must be provided on the site to prevent vehicles, including service vehicles such as rubbish collection vehicles, reversing directly onto or off Brighton Road. The area must be large enough so that an 85th percentile design motor car is only required to make one reversing movement when manoeuvring.
13. Tracking curves demonstrating that a for a 21 seat van can turn around on site must be provided at building consent stage.
14. The applicant must supply confirmation of adequate access consistent with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 at building consent stage.
15. Any damage to any part of the footpath or road formation as a result of the demolition or construction works must be reinstated at the applicant's cost.
16. Shared transportation to and from the site for employment is to be provided.
17. Residents may not park private vehicles off-site within 300m of the site entrance.
18. Within 7 days of the proposal being implemented (and then yearly), letters will be delivered to all properties within a 300m radius of the site entrance informing them that site residents are not to utilise off-site parking within that 300m radius, and if any resident has a concern relating to the use of on street parking, then they are to contact the site manager, with the site manager details being provided.

19. A Traffic Management Plan shall be submitted to and approved by Dunedin City Council, prior to the commencement of any construction works, including traffic control works for any works within the road reserve. Traffic shall be managed in accordance with the approved plan.
20. Pursuant to section 128 of the Resource Management Act, the transportation requirements of this consent may be reviewed one year after the commencement of the activity, and annually thereafter, to ensure any adverse effects on the transportation network and are sufficiently managed. This condition relates to, but is not necessarily restricted to the following components:
 - Operation of the site access
 - Management of overspill parking including the need for additional on-site parking to be provided, or a formal off-site parking area to be arranged/leased by the operator.

Rubbish collection

21. Waste collection and recycling must be undertaken privately by a commercial operator and must be undertaken entirely within the site.
22. No household rubbish from the site may be deposited at any Council reserves or public rubbish bins.
23. Pursuant to section 128 of the Resource Management Act, the waste management requirements of this consent may be reviewed one year after the commencement of the activity, and annually thereafter, to ensure any adverse effects on the local public reserves and transportation network ~~and~~ are sufficiently managed.

Laundry

24. Any laundry associated with work uniforms (such as overalls) and bedding is to be taken off site for washing.

Landscaping

25. At least 10 working days prior to construction commencing, details of the roof colours for the units shall be submitted to rcmonitoring@dcc.govt.nz for approval by the Council's Landscape Architect.

26. At least 10 working days prior to construction commencing, a landscape plan shall be submitted to rcmonitoring@dcc.govt.nz for approval by the Council's Landscape Architect. The landscape plan shall include the following:
- Internal planting to consist of native trees of a size no less than 2.5m high at a rate of 1 tree per every four units, to be distributed throughout the site. Due to the time limit associated with the resource consent, these trees can be in containers, with the 2.5m height requirement being measured from the ground level below the container, as opposed to the ground level within the container.
 - Details of the proposed plantings along the creek edge. Planting is to be completed within 18 months from the date the resource consent is granted.
 - Measures such as planting or fencing to ensure that outdoor amenity spaces are not used for vehicle parking.
27. ~~Planting in accordance with the landscape plan must be undertaken prior to occupation of the site.~~

Confirmation of ongoing use of existing site access

28. The applicant must provide confirmation for the Council's records that Land Information New Zealand agrees to the ongoing use of the portion of 1046 Brighton Rd that currently forms part of the access to the site, or in the event that LINZ does not provide such approval, further details of the operation of the narrower access and a management plan for any issues this creates such as emergency vehicle access, rubbish collection access, must be provided for approval to rcmonitoring@dcc.govt.nz at least 10 working days prior to ~~occupation of the site~~ the implementation of the activity authorised by this resource consent.

Construction phase

29. With regard to construction activity, this shall be limited to the times set out below and shall be designed and conducted to comply with the following noise limits as per New Zealand Standard NZS 6803:1999 Acoustics – Construction noise:

Table as per s42A Report.

30. Should the consent holder cease, abandon, or stop work on site for a period longer than 6 weeks, the consent holder must first take adequate preventative and remedial

measures to control sediment discharge/run-off and dust emissions, and must thereafter maintain these measures for so long as necessary to prevent sediment discharge or dust emission from the site. All such measures must be of a type and to a standard which are to the satisfaction of the Resource Consent Manager.

31. At the completion of any earthworks (or earlier, if conditions allow) any exposed areas remaining must be immediately adequately tip-soiled and vegetated (e.g. hydro-seeded) as soon as possible to limit sediment mobilisation.
32. All measures (including dampening of loose soil) must be undertaken to ensure that dust, resulting from the proposed earthworks, does not escape the property boundary, including during the transportation of material off the site.
33. No soil disturbance or soil shifting, unloading, loading shall take place if wind speed is higher than 14 metres per second if the soil is dry and prone to becoming airborne, unless a dust suppressant is applied.
34. To ensure effective management of erosion and sedimentation on the site, measures shall be taken and devices shall be installed where necessary to:
 - a. Divert clean run-off away from disturbed ground
 - b. Control and contain stormwater run-off; and
 - c. Avoid sediment laden run-off from the site.
35. Any fill material to be introduced to the site must comprise clean fill only.
36. As-built records of the final extent and thickness of any un-engineered fill must be recorded and provided to the Council for its records.

Water services

37. An RPZ boundary backflow prevention device shall be installed on the water connection, to the satisfaction of the 3 Waters.

Stormwater

38. A Stormwater Management Plan (SWMP) must be provided to and approved by 3 Waters prior to construction commencing.

39. Any modifications to stormwater flow or new culverts must be designed by an appropriately qualified person/s and ensure that overland stormwater flows are not interrupted and not increase any adverse effects from local ponding during storm rainfall events.
40. Any modification to the site must not increase any adverse ponding effects on neighbouring lots as a result of the work.

Wastewater services

41. New wastewater services must be installed.

Accidental Discovery Protocol

42. If the consent holder:

(a) discovers koiwi tangata (human skeletal remains), waahi taoka (resources of importance), waahi tapu (places or features of special significance) or other Maori artefact material, the consent holder must without delay:

(i) notify the Consent Authority, Tangata whenua and Heritage New Zealand and in the case of skeletal remains, the New Zealand Police.

(ii) stop work within the immediate vicinity of the discovery to allow a site inspection by Heritage New Zealand and the appropriate runanga and their advisors, who must determine whether the discovery is likely to be extensive, if a thorough site investigation is required, and whether an Archaeological Authority is required.

Site work must recommence following consultation with the Consent Authority, Heritage New Zealand, Tangata whenua, and in the case of skeletal remains, the New Zealand Police, provided that any relevant statutory permissions have been obtained.

(b) discovers any feature or archaeological material that predates 1900, or heritage material, or disturbs a previously unidentified archaeological or heritage site, the consent holder must without delay:

(i) stop work within the immediate vicinity of the discovery or disturbance;
and

(ii) advise the Consent Authority, Heritage New Zealand, and in the case of Maori features or materials, the Tangata whenua, and if required, must make an application for an Archaeological Authority pursuant to the Historic Places Act 1993; and

(iii) arrange for a suitably qualified archaeologist to undertake a survey of the site.

Site work must recommence following consultation with the Consent Authority.