

APPENDIX 4:
COUNCIL OFFICER COMMENTS

Memorandum

TO: City Planning

FROM: Development Support Officer, 3 Waters

DATE: 23 May 2022

LUC-2022-177 **CONVERT THE EXISTING MOTOR CAMP INTO 46 ONE-BED UNITS FOR WORKERS ACCOMMODATION**

SUBJECT: **1044 BRIGHTON ROAD, DUNEDIN**

3 WATERS COMMENTS

1. The proposed activity

Landuse consent is sought from DCC to convert the site from a former Motor Camp to a 46 one bed unit workers accommodation at 1044 Brighton Road, Dunedin. The site is within the Township and Settlement zone in the Second-Generation District Plan (2GP).

The site is also within a Hazard 1 (flood) zone, a Hazard 2 (flood) zone, a Hazard 3 (coastal) zone and within an Esplanade Reserve and Strips area. The site includes approximately 4881m² of the Otokia Creek and there is also a ROW Easement to the DCC pumping station which is situated centrally within the Southern part of the site.

Existing services

The DCC's GIS records a 150mm diameter water pipe and a 150mm diameter wastewater pipe in Brighton Road. Within the site there are several wastewater pipes passing into and out of the DCC pumping station. There is also a piped watercourse that runs diagonally across the lower section of the site running from North East to South West discharging into the river.

Density assessment

Township and Settlement rules in the 2GP set a minimum site area of 500m² but allows one undersized site provided the overall density is compliant. The overall site is 10,081m² which would allow 20 units. The site is 12,919m² undersized for 46 units. **Therefore, 3 Waters do not support this application.**

2. Infrastructure requirements

Code of Subdivision & 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 lot must be serviced from an individual Point of Supply. There is an existing water connection to the property which can be retained. 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.

There is a Fire Hydrant (WFH05390) 35m from the development entrance and a second Fire Hydrant (WFH05391) 66m from the development entrance. Based on SNZ PAS 4509:2008 a FW2 (25l/s) zone requires a Fire Hydrant within 135 m and a second within 270 m. These Fire Hydrants requirements are compliant for the development.

Stormwater services

The proposal is non-compliant to the current District Plan rules of minimum site size/density for a Township and Settlement zone; therefore, a Stormwater Management Plan (SWMP) is required.

A Stormwater Management Plan (SWMP) prepared by a suitably qualified person must be submitted to Dunedin City Council including the following:

- i. Stormwater calculations which state the difference between the pre-development flows and post-development flows and how to manage any difference in flow; and
- ii. An assessment of the current and proposed imperviousness of the site; and
- iii. Secondary flow paths; and
- iv. Any watercourses located within the property; and
- v. Detail of proposed stormwater management systems for the development to accommodate for any excess runoff from extra impervious surfaces; and
- vi. An assessment of the current network and its ability to accept any additional flow from the proposed development.
- vii. Measures to ensure acceptable level of Stormwater quality being discharged from the site.

The SWMP must be submitted and approved by 3 Waters prior to any construction commencing.

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

To reduce water consumption and therefore the volume of wastewater generated, the consent holder is encouraged to implement water saving devices, including but not limited to, low-flow shower heads, 6/3 dual flush toilets and aerated sink mixers.

Watercourses

There is a piped watercourse located within this property. The property owner is responsible for a watercourse from where it enters their property to where it exits. This includes keeping it and any associated grates clear so the water can flow unimpeded. Any discharge of stormwater to the watercourse or work within the watercourse (such as piping or filling) must comply with the requirements of the Regional Plan: Water, and with any building consent requirements for related

structures. It is recommended that the applicant contacts the Otago Regional Council to discuss permitted rules for the watercourse, and whether Regional Council consent is required.

Easements

All current easements and ROW shall remain.

3. Consent conditions

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

Water services

- a. An RPZ boundary backflow prevention device shall be installed on the water connection, to the satisfaction of the 3 Waters (refer to advice note).

Stormwater services

- b. A Stormwater Management Plan (SWMP) for the subdivision shall be provided and approved by 3 Waters prior to construction commencing.

Wastewater services

- c. New wastewater services will be required.

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.

Low flow devices

- The consent holder is encouraged to implement water saving devices, including but not limited to, low-flow shower heads, 6/3 dual flush toilets and aerated sink mixers, to reduce water consumption and therefore the volume of wastewater generated.

Erosion and sediment control

- The following documents are recommended as best practice guidelines for managing erosion and sediment-laden run-off:
 - The Erosion & Sediment control Toolbox for Canterbury found on the ECan website link CRC Erosion & Sediment Control Toolbox <http://esc Canterbury.co.nz>
 - Dunedin City Council “Silt and Sediment Control for Smaller Sites” (information brochure).

Watercourses

- Any work within a watercourse (including piping) or discharge of stormwater to the watercourse must comply with the requirements of the Regional Plan: Water, and with any building consent requirements for related structures. It is recommended that the applicant contacts the Otago Regional Council (ORC) to discuss permitted rules in regards to the watercourse, and whether regional council consent is required.
- You are responsible for:
 - Ensuring that there are no obstructions or impediments in the watercourse which may inhibit the flow of water.
 - Ensuring that any grates or outlets within your property are kept clear of debris at all times.
 - Any work you undertake in relation to a watercourse to meet your responsibilities must comply with the Regional Plan: Water.
- More information on watercourses can be found at:
http://www.dunedin.govt.nz/data/assets/pdf_file/0008/338552/Watercourse-Information-2014v2.pdf

Helen Little
Subdivision Support Officer

3 Waters



Memorandum

TO: Laura Mulder

FROM: Seepage Control Unit

DATE: 18 May 2022

SUBJECT: LUC 2022-177
1044 Brighton Road
Brighton

There is a piped watercourse located north to south within this property. There are 3 Dunedin City Council foul sewers, a Council sewage pump station and a pumping sewer main dissecting this property in various locations. All private drainage matters will be dealt with at time of Building Consent.

Technical Support Officer

Neville Mackay

Memorandum

TO: Jane O'Dea, Planner

FROM: Luke McKinlay, Landscape Architect

DATE: 28 October 2022

SUBJECT: LUC-2022-177 – 1044 BRIGHTON RD. LA COMMENTS

Hi Jane,

The following is in response to your request for comment on the above application for a worker accommodation facility at Brighton.

The proposal:

The land use consent application proposes to convert the former Brighton motor camp to a workers accommodation facility comprising 46 one-bedroom portable units (3m x 6m) on approximately 3500m² of the site and to use the existing dwelling on the site for manager accommodation.

Although each unit contains a bathroom and kitchenette, the existing facilities block would also be used for laundry and cooking facilities. The applicant considers that any earthworks will comply with permitted activity rules. Thirteen parking spaces are also shown.

The application refers to the need for worker accommodation for the new Dunedin Hospital (approximately 8 years+) but given uncertainties around the projected construction timeframe, no end date for consent is proposed, and a consent notice is suggested to address the end of use. Conditions offered include:

- The facility will have an on-site Manager, and an annual review of management is mentioned.
- The Manager's contact details will be provided to adjacent neighbours, and clearly displayed at the site entrance.
- The individual residential units will not be rented/leased separately.
- The individual residential units will have a maximum of 1 person per unit.
- All residents must have employment.
- If required, conditions can also extend to external laundry services, and contracted rubbish and recycling services.
- Landscaping – roof colours and landscape plan to be approved by the Council.
- No communal outdoor space is proposed.
- Shared transportation to/from the site for employment is to be provided/arranged.
- Management of parking including prohibition on residents parking off-site within 300m of the site entrance.
- Hazard evacuation management plan to be prepared.

The subject site is zoned **Township and Settlement** in the Proposed 2GP Plan and includes:

- Hazards 3 (coastal) overlay, Area 1A over most of the site to be developed (note this overlay does not include the existing dwelling and large shed on the eastern boundary).
- Hazards 2 (flood) overlay, over some of the banks of the Otokia Creek within the site. This Hazards 2 (flood) overlay lies within the Hazards 3 (coastal) overlay.
- Hazards 1 (coastal) overlay, over the site within to the stream/lagoon area. This Hazards 1 (Coastal) overlay also overlaps with the Hazards 3 (coastal) overlay.

- an Archaeological Alert layer over the entrance to the site, in the shape of an arc that is approximately 20m deep at the southern end of the site.

2GP Activity Status

The application is being considered under the 2GP definition of 'standard residential' development, however, it is acknowledged that the development appears to have some characteristics of 'visitor accommodation.'

Standard residential is a **non-complying** activity because the density rule would not be complied with.

- Density. Strictly speaking with Variation 2 in effect the permitted baseline is 2 residential units for the site because multi-unit consent is needed for anything more than this, but I think it needs to be recognised that a plausible development given the site size would be more in the order of 10 additional units.
- Outdoor living space of 25m² is required per unit (Rule 15.3.3.3.c);
- Service area of 117.5m² is required and 20m² is provided (Rule 15.3.3.3.d);
- Parking, loading and access not meeting the aisle width (Rule 6.6.1.1.f)).

'Visitor accommodation' is a restricted discretionary activity. Since the application was submitted, Variation 2 has removed the 3 month stay limit and now refers to 'The use of land and buildings for temporary accommodation on a commercial fee paying basis.' Campgrounds with visitor accommodation units, tiny houses etc are a sub-activity of visitor accommodation.

Comments

Existing environment

The subject site is located near the centre of Brighton, approximately 18km southwest of Dunedin. Brighton is a small coastal settlement, located either side of the Otokia Creek. Residential areas are largely concentrated along the coastal edge (on the inland side of Brighton Road) and lower hillslopes overlooking the coast. Brighton merges with the settlement of Ocean View to the north. A small commercial centre consisting of a dairy, café and the Brighton Club is centrally located on the north-eastern side of Otokia Creek. A paddleboat and rowboat hire business has, until recently operated out of a boat shed immediately to the south of the vehicle entrance to the subject site.

To the south of the commercial centre, on the opposite side of Brighton Road, is the carpark for the main beach and surf lifesaving building. The coastal edge near Brighton is defined by a series of coves, reefs, sandy beaches and headlands. The headland immediately to the south of the main beach, and the mouth of the Otokia Creek, contains a recreational green space, the Brighton Domain. Coastal reserves extend to the south and north of the settlement. These contain a mix of exotic and native vegetation and marram grass covered dune systems

The subject site is located behind the small commercial centre, adjacent to the Otokia Stream. The site was, until early 2022, operating as the Brighton Motor camp, which included the following:

- A manager's dwelling.
- 5 cabins and 29 caravan parks (20 permanently used, 9 for casual use).
- A shared facilities block.

In total, the site is 10,081m², which is comprised of the large flat area used by the former Motor camp (3500m²). The former managers house occupies a 1700m² part of the site, immediately north of the camp site. The site also includes part of the Otokia creek.

The site includes some planting (a mix of native and exotics species), which is concentrated around the creek edge of the site.

Effects on streetscape amenity and character

The subject site is not highly prominent from surrounding streets. The site is located to the rear of 1036, 1038, 1040, 1042 and 1046 Brighton Road. From nearby locations on Brighton Road, the dairy (1042 Brighton Road) and neighbouring dwelling (1040 Brighton Road) largely block views of the site. Views of southern parts of the site are available from the vehicle entrance to the site on Brighton Road (refer figure 1). Peripheral views of southern parts of the site are also visible from the nearby bridge over Otokia Creek (refer figure 2). From both these locations, existing planting along the creek edge of the site provides partial screening of the interior of the site. Given the limited visibility of the site from surrounding streets, it is considered that the proposed development will have relatively low visual effects on existing streetscape amenity and character.

Effects on surrounding sites residential amenity

The site is visible from some nearby residential sites on Morse Street on the opposite side of Otokia Creek. A residential dwelling at 1040 Brighton Road also backs onto the site. The extent to which the site is visible from residential properties on Morse Street varies depending on the extent of intervening vegetation. In some cases, mature trees on the banks above Otokia Creek largely screen views of the site from properties on Morse Street. From other properties, views overlooking the site are largely unobscured.

It is acknowledged that the proposed use of the site for worker accommodation, will bear some resemblance to the former use of the site as a motor camp, which was characterised by a collection of caravans and cabins. The proposed units, at 3m x 6m, are comparable in scale to the cabins and caravans, which previously occupied the site. However, the proposed density of units will be noticeably greater as viewed from residential properties on Morse Street that overlook the site. The proposed development will likely have some adverse visual effects as viewed from these locations associated with the proposed dense arrangement of units with little open space. It is considered that the provision of a greater extent of open amenity space within the site would help to provide some relief from the proposed dense and regimented arrangement of units and help to reduce potential adverse visual amenity effects to low levels/a comparable level of visual amenity to the motor camp.

It is noted that unlike a motor camp, which tends to have a pattern of seasonal occupancy, with fewer visitors (and caravans) in the winter and busy times in the summer, the proposed workers accommodation units will be in place and occupied year-round for the length of the hospital built (estimated to be 8+ years).

It is noted that the applicant is proposing to paint the units so that they are visually recessive and to plant some additional trees within the site. It is agreed that both measures, in addition to the provision of more outdoor amenity space, would help to lessen adverse amenity effects from surrounding locations to relatively low levels.

It is recommended that additional planting is undertaken around both the periphery of the site, and internal to the site, to enhance the amenity of the site for both residents of the site and nearby residents.

It is considered that effects on the visual amenity of the adjoining residents at 1040 Brighton Road will be low given that the site is screened from this property by a solid fence. Further, it is noted that the motor camp appeared to have a number of cabins and caravan sites immediately adjoining the western boundary of this property. As such, where views of the top of cabins are available, there will likely be little difference between the view of the nearest units/caravans of the motor camp when compared with the nearest cabins of the proposed development.

It is considered that the amenity of boat users on the Otokia Creek should also be considered. It is noted that until relatively recently a boat hire business has operated from the adjacent site and it is plausible that this business will be operational in the future. In general, it is considered that from the perspective of boat users on the creek, extensive views into the site will not be available. However, enhancing the level of existing planting at the water's edge would help to maintain the amenity values of the creek edge for members of the public boating on the creek.

A service area of 20m² is proposed, along with managed services such as recycling and rubbish, which the applicant proposes will result in a smaller space requirement. Further details are required regarding how the service area will be managed and where it will be located. It is recommended that this area is screened from view from surrounding locations and away from outdoor amenity spaces within the site.

On-site amenity

It is considered that adverse on-site amenity is the key area concern regarding this development, which stems from the proposed high density and rigid arrangement of units across the site.

Policy 15.2.2.1 requires residential development to achieve a high quality of on-site amenity by:

- a. providing functional, sunny, and accessible outdoor living spaces that allow enough space for on-site food production, leisure, green space or recreation;
- b. having adequate separation distances between residential buildings;
- c. retaining adequate open space uncluttered by buildings; and
- d. having adequate space available for service areas.

The application fails to meet the minimum outdoor amenity space requirements (25m²) for many of the units and most of the units that are located internally within the site e.g units 8-12, 14-18, 37 & 38, 45 & 46.

Whilst the provision of fully compliant individual amenity spaces for each individual unit may not be necessary for this type of multiple unit development, it is noted that no communal outdoor amenity spaces are proposed. To avoid cramped living conditions and considering the failure to meet minimum outdoor amenity space requirements on a unit basis, it is recommended that two or three communal areas are necessary to provide an adequate level and type of outdoor amenity space for workers occupying this facility. A reduction in the overall numbers of units may be required to achieve this.

As identified in the submission of S Laing & A Mauger, which is supported by research articles, providing outdoor amenity spaces for worker accommodation plays a valuable role in the well-being of residents of these worker accommodation sites. While it is acknowledged that there are nearby recreational open spaces, which could be utilised by future residents of these units, it is considered that because this is long-term (8+ years), year-round worker accommodation rather than short-term/summer only accommodation adequate on-site open amenity spaces are an important consideration.

As proposed the development has a very rigid, evenly distributing arrangement of units. Rearranging and rationalizing the proposed layout to providing a greater extent of outdoor amenity space uncluttered by buildings would present an opportunity to address potential CPTED issues with the proposed layout, such as the following:

- Improved access – the creation of clearly defined pedestrian pathways through the site for safe and convenient movement (no detail is provided regarding how pedestrian paths will be formed – a grassed surface would not be adequate/would likely result in a muddy track in winter).
- Improved sightlines and the avoidance of concealment spaces.
- Improved overall environment with a mix of private and communal spaces.

The current layout would result in outdoor living areas with a less than favourable orientation. Even where outdoor living spaces are north facing, there would be instances where neighbouring units would be located directly against an outdoor amenity space with a 'bedroom' window overlooking it.

An improved outcome would likely be possible if the units were consolidated into clusters and a mix of shared and private outdoor living space was developed. This would provide a more integrated development with a stronger residential character. This would also give residents the option of socialising, allow for well-planned service areas and provide space for planting and other amenities.

It would be necessary to ensure communal outdoor amenity spaces are not used for vehicle car parking. This may require these areas to be defined by planting and/or fencing and their use managed by the on-site manager.

A planning mechanism to ensure that this works accommodation is only a temporary arrangement associated with the hospital build and will be dismantled/removed from site at the completion of the hospital project is also recommended to ensure that this development, which is proposed to specifically address the needs of hospital construction workers, is not used for long-term housing.

Comments on Submissions

Ten submissions have been received in response to this application. Six submissions are in opposition and four are neutral. Seven submissions address potential adverse effects associated with the proposed density of the development. Whilst these submissions do not specifically address the visual amenity implications of the proposed high density, they express concern regarding the effects of density on the ability to provide adequate parking, to provide sufficient space to manoeuvre a fire appliance, to provide adequate communal outdoor amenity space. Concern regarding increased demand on facilities in Brighton and disorderly behaviour and noise are also expressed.

It is noted that only 13 parking spaces are provided. These comments do not address matters regarding the provision of adequate parking/effects on parking in surrounding parts of Brighton. While it is acknowledged that the proposed high density of units will likely lead to demand for parking spaces, these matters are left to the consideration of the transport department.

Conclusions and Recommendations

- Effects of the proposed development on streetscape amenity are generally considered to be low (less than minor), given that the site is largely screened from view from surrounding streets.
- Unmitigated, effects on surrounding sites residential amenity values are likely to be more than minor but could be kept to low levels if mitigation measures are adopted, including painting the units in a complementary combination of visually recessive colours, providing additional planting and increasing the extent of open space, uncluttered by buildings.
- Preparation of a planting plan should be required as a condition of consent. It is recommended that planting be required at the edge of the Otokia Creek, bordering the site and internal to the site (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). The planting of these areas should be required prior to occupation of the site.
- To ensure adverse effects on on-site amenity are no more than minor, it is considered that the layout and extent of the units should be reconsidered. It is recommended that two or three communal outdoor amenity spaces are provided within the site.

Regards,

Luke McKinlay
Landscape Architect

Reviewed by

Mark Mawdsley
Team Leader Advisory Services

Appendix 1: Site Photographs



Figure 1: View from entrance to the site.



Figure 2: View towards site from bridge over creek.



Figure 3: View towards the development from near 25 Morse Street.



Figure 4: Large trees screening views towards the site from some properties on the opposite side of Otokia Creek.



Figure 5: Internal view of the site - view towards boundary with 1040 Brighton Road.

Jane O'Dea

From: MWH Hazards Team <MWHHazardsTeam@stantec.com>
Sent: Tuesday, 24 May 2022 03:01 p.m.
To: Laura Mulder; MWH Hazards Team
Subject: RE: LUC-2022-177 - Memo request for department comment - 1044 Brighton Rd

Hello Laura,

We have assessed the application in relation to the hazard register, street files and available aerial photography. We have not visited the site.

We have the following comments to make regarding the application.

Proposal

The proposed activity is to convert the existing motor camp into workers accommodation with 46 one bedroom portable units.

Site investigation reports have not been provided.

Plans for the proposal are provided within the application.

Hazards

From the Hazard Register, street files, and previously sent emails ; for both this title and nearby properties

- Hazard ID 10106: Land Stability – Land Movement (Alluvial Fans – Active Floodwater dominated)
- Hazard ID 11407: Seismic – Liquefaction (Domain C)

Global Setting

The underlying geology consists of alluvial deposits adjacent to Otokia Creek.

Discussion

The proposal outlines some 46 removable units to help with worker accommodation for the construction the hospital. Whilst there are significant hazards associated with flooding and seismic effects, the nature of the structures are temporary.

There is likely to be lateral spreading liquefaction in a strong seismic event. This will directly affect the site. Minimum floor levels are likely to be required.

We anticipate that these structures will be largely placed either on the ground or on removable supports. No earthworks are anticipated to be required for the units.

Conditions

The following conditions are standard conditions, some of which are generic in order to address a potential of work that whilst not indicated, could conceivably occur at the site. We recommend that the following conditions be required:-

- As-built records of the final extent and thickness of any un-engineered fill should be recorded
- Any modifications to stormwater flow or new culverts shall be designed by 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.
- Any modification to the site shall not increase any adverse ponding effects on neighbouring lots as a result of the work

Regards,

Edward Guerreiro
BEng Civil
Civil/Geotechnical Engineer

Mobile: +64 21 866 028

Jane O'Dea

From: Jane O'Dea
Sent: Monday, 7 November 2022 11:10 a.m.
To: Jane O'Dea
Subject: FW: LUC-2022-177 - 1044 Brighton Rd - Request Hazard comment on flooding.

From: Edward Guerreiro <Edward.Guerreiro@stantec.com>
Sent: Monday, 4 July 2022 1:29 p.m.
To: Robert Buxton <robert@buxtonwalker.co.nz>; MWH Hazards Team <MWHHazardsTeam@stantec.com>
Cc: Laura Mulder <Laura.Mulder@dcc.govt.nz>; Planning <cod.planning@dcc.govt.nz>
Subject: RE: LUC-2022-177 - 1044 Brighton Rd - Request Hazard comment on flooding.

Hi Robert,

Sorry it took so long to respond, I got carried away by other things.

Thanks for your time on the phone. I've just had a review of the videos and talked through the concerns with yourself.

From what I understand, the applicant can install temporary structures on the site. Although they should be cognizant of the flood hazard on the site.

There is a 18% chance of having a 50 year event occur within the timeframe of the proposed use of the site. It is reasonable to assume this type of event would flood the site.

As long as the structures are temporary and meet minimum floor levels, I think it is allowed. Building consent will require minimum floor levels to be set which may require flood hazard assessment. This flood hazard assessment may also take into account the duration of the proposed activity in their floor level requirements. So this might put a hard deadline on their activity based on floor levels.

Let me know if this addresses your concerns.

Regards,

Edward Guerreiro
BEng Civil
Civil/Geotechnical Engineer

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Memorandum

TO: Robert Buxton – Planning Consultant

FROM: Yan Tong Jiang- Environmental Health Officer

DATE: 23 May 2022

SUBJECT: **LAND USE CONSENT - LUC-2022-177 – 1044 BRIGHTON ROAD, DUNEDIN**

You have asked for Environmental Health Comments on this application for a resource consent to covert the motor camp to workers accommodation involving 46 one-bedroom portable units on approximately 3500m² of the site.

The site has been operating as a caravan/campervan park for a number of years. The 2GP maps show the site as being zoned Township and Settlement.

The application refers to the need for worker accommodation for the new Dunedin Hospital. The proposal will result in earthworks and construction works.

I have read the application and am generally familiar with the locality. Environmental Health aspects of this application relates to noise from the construction work and the proposed unique residential activity - workers accommodation.

Construction Noise Limits

The applicant mentioned the proposal will be involving the earthworks and construction work. Noise from construction works frequently causes complaints to Council. Therefore, all construction work on the site shall be designed and conducted to ensure that construction noise for typical duration between 14 days and 20 weeks from the site does not exceed the noise limits in the following table.

Time of Week	Time Period	Leq (dBA)	L max(dBA)
Weekdays	0730-1800	75	90
	1800-2000	70	85
Saturdays	0730-1800	75	90
	1800-2000	45	75
Sundays and public Holidays	0730-1800	55	85
	1800-2000	45	75

Noise levels shall be measured and assessed in accordance with the provisions of NZS 6803: 1999 Acoustics – Construction noise.

Residential activity

With a large number of units on one site, the applicant is offering a number of conditions to mitigate the effects, including:

- The facility will an on-site Manage, and an annual review of management is mentioned.
- The Managers contact details will be provides to adjacent neighbours and clearly displayed at the site entrance.

- The layout has been designed to avoid providing a large area for congregation.

The 'Noise Management Plan' has not been mentioned at the application. It may be that the owner will need to put in place a 'Noise Management Plan' that may include rules for occupiers, regular check by management.

Summary of Recommendations

Based the above information, I have no objection in principle to the proposal. If consent is granted, the following information should be included in the consent by means of Advice Note:

1. NZS 6803 Construction noise standard shall be a condition.
2. I recommend that the owner of the property need to put in place a Noise Management Plan to ensure the noise from the site doesn't cause excessive noise issues.
 - Noise between occupiers in this large accommodation site is dealt by the landlord under the Residential Tenancies Act 1986.
 - Noise control is considered the landlords responsibility and in the event of any such offences could be liable to a fine.

Yan Tong Jiang
ENVIRONMENTAL HEALTH OFFICER

TO: Robert Buxton

FROM: Antoni Facey – Consultant Transport Planner

DATE: 30/5/2022

SUBJECT: **LUC-2022-177 1044 BRIGHTON ROAD**
BRIGHTON

APPLICATION:

This application is for 46 studio apartments to be constructed on an existing camping ground. The units are for short term accommodation to assist with rebuild of facilities such as the hospital. An existing house will be used as managers accommodation.

The units will be transportable and can be relocated when demand for worker accommodation reduces.

13 carparking spaces are proposed.

The zoning is Township and Settlement.

The application is non complying.

A revised plan was sent showing carparking and an explanation of how the site will function for traffic.

ACCESS:

Access is from a parking area adjacent to Brighton Road on the outside of a horizontal curve.

Width of the access is typically 6 metres and is partially outside the road reserve but is variable. There are also judder bars installed on the access to control speeds. It is understood that the existing road and access will be used in the new layout. This will be adequate for the proposed activity. Drivers will be regular users and familiar with the site and access arrangements.



PARKING AND MANOEUVRING:

The initial plan supplied is of poor hand drawn standard. The revised plan allowed for more clarity around the parking dimensions and the manoeuvring available.

The 13 parking spaces are of compliant dimension. However, the aisle width is below expectations in part. It is however, generally compliant with the AS/NZS 2890.1 and is compliant around the important parking manoeuvring area.

There is no turning head on site to allow drivers to exit in a forwards direction. A vehicle access to a house allows for a 3 point turn on site so vehicles can leave in a forwards direction. To reverse off the site would require reversing blind around a curve which is not acceptable. The proposed turning option is adequate to alleviate this issue. Tracking should be shown to allow this to be confirmed. Since it is siting of the dwelling units that will restrict turning paths, it is considered that this can be assessed at building consent stage and dwelling locations adjusted if necessary.

It should also be noted that in my experience, companies will provide larger people mover type vehicles to transport staff to and from the workplace. The number of parking spaces on site is reasonable and some of the people mover vehicles may park on site overnight. These vehicles may require larger spaces than usual and some spaces appear capable of accommodating such vehicles. This has been confirmed by the applicant and they will be proposing mid sized vans to transport residents. The vehicle spaces will be adequate for this purpose.

The applicant has offered a condition that no vehicles larger than a mid sized van should be used on site. While there is no definition of mid sized van, a passenger capacity should be conditioned to ensure large buses are not used. A 21 seat capacity vehicle would be appropriate.

It is unlikely that any significant amount of on street parking would be required for this application.

Rubbish collection has not been determined but it is intended that the rubbish removal should be from a private collection system. If it is intended that an on site private system is proposed, manoeuvring must be provided on site for the truck to turn around on site and leave in a forwards direction.

TRAFFIC GENERATION:

Traffic generation will be limited. There will be no more than 2 movements per day per private vehicle parked on site. If mass transport vehicles are brought to site each day, they could account for 4 movements each.

The total number of potential traffic movements generated by the site is unlikely to be greater than the potential from the current camping ground when operating at its peak.

Therefore, there is unlikely to be any capacity issues.

CONCLUSION

Transport considers the effects of the proposed development on the transportation network to be no more than minor, subject to the following condition and advice notes:

CONDITIONS:

1. 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.
2. The largest vehicle used on the site must have a seating capacity no larger than 21 seats.
3. 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.
4. Sufficient manoeuvring space must be provided on the site to prevent 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. Tracking curves for a 21 seat van to turn around on site must be shown at building consent stage.
5. 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.

ADVICE NOTES:

1. It is advised that in the event of any future development on the site, Transport would assess provisions for access, parking and manoeuvring at the time of resource consent/building consent application.
2. The existing access arrangements should be used without reductions in dimensions.

Jane O'Dea

From: Nic Jepson
Sent: Monday, 23 May 2022 05:03 p.m.
To: Robert Buxton
Cc: Laura Mulder
Subject: RE: LUC-2022-177 - Memo request for department comment - 1044 Brighton Rd

Hi Robert

I refer to the request for comment by the Compliance team on the following:

NOTE FOR COMPLIANCE: *Please advise if paragraphs 18 and 19 on scanned pages 12/43/and 13/43 are correct and the activities are legally established*

I understand the request to relate to the 'use' of the property for residential activity and the permanent structures on site.

18. Up until early 2022 the site operated as the Brighton Motor Camp, including:
- A managers dwelling.
 - 5 cabins and 29 caravan parks (20 permanently used, 9 for casual use). The majority of the permanent caravans had permanent awnings.
 - A shared facilities block.
19. However, the majority of the fixed caravans and vacant sites were used as residential activity. Hence the camper van facility was secondary to the residential use of the majority of the site.

Comments:

- 2002 – resource consent RMA-20002-365925 for 'two additional accommodation units'. The consent stated 'The approved development involved an existing house, 20 caravan/campervan parks, a disposal point for campervan effluent and an ablution block. The present use of the site is consistent with the consent granted'
- 2008 - There was a complaint lodged, where the complainant believed the motor camp was being used for permanent residential activity and attaching structures
 - Complaint closed stating: *no further investigation unless rescheduled/re lodged*
- According to Council records, there does not appear to be any resource consent to authorise the permanent awning structures (should they've been required), or the use of the motor camp for permanent residential activity, apart from the managers dwelling. The only other structures approved are the two motor camp units, and two garages.
- I do not believe the residential activity is legally established.

Kind regards

Nic Jepson
SENIOR PLANNER – MONITORING AND COMPLIANCE
RESOURCE CONSENTS ●●●●●

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