

APPENDIX 3:
SUBMISSIONS RECEIVED

From: [REDACTED]
To: [Resource Consent Submissions](#)
Subject: Resource consent application submission - LUC-2022-177 - 891623
Date: Monday, 26 September 2022 02:41:55 p.m.

Your details

Name:
Colin Weatherall

Organisation/On behalf of:
Community Resident / Advocate of over 40 years in this Community

Postal address:
1118 Brighton Rd Brighton 9035 Brighton Dunedin City 9035

Contact phone number: [REDACTED]

Email address: [REDACTED]

Address to be used: Email

Withhold contact details: No

Trade Competition

I am a trade competitor for the purposes of section 308B of the Resource Management Act 1991: No

I am directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition: Yes

Submission details

Your position: I oppose this application

The specific parts of the application that this submission relates to are:

i indicate my opposition to the application UNLESS the proposal is amended / adjusted/ Conditions offered that may reduce / allow me to offer support . my request is to present to a Council hearing panel and expand on my submission / answer question as practical from the Hearing Panel (i would consider a pre hearing meeting if offered / invited) Colin Weatherall

My submission is:

Matters of concern BUT not limited too in application i note the PROPOSAL as outlined and Conditions as offered in general these matters are not sufficiently detailed or adequately described to give certainty . This is a particular application that needs "in accordance with / not generally in accordance as RMA act may allow. decision panel to direct. Health & Safety matters to Community & onsite activity as proposed be "in accordance with " as confidence into limited future is required Extreme need for all Safety aspects (roading / footpath / visibility to be offered/ implemented at applicants Expense as this is a direct access to Big Rock School & Little Rock Preschool and adjacent to Brighton Community services (Brighton Shop/ Brighton Cafe / Brighton Club etc) This includes Construction period of / operational life of 24/7 , should ultimately approval be

granted Hours of construction activity needs clear & all operational matters outlined . Life of Consent Land use after this proposed activity as in application "limited life " is indicated to proposed activity Landscaping & associated conditions of proposal need to be increased. Color scheme of facility Roofs & walls to blend into natural surroundings/ community absolute of limits / certainty on Car Parking within community / project plan (increase on site numbers preferred (current condition offered requires Community to monitor unacceptable) No Double stacking of units either in Development / ongoing No Double bunking at all No alternative use /or sub letting overnight / longer term On site Manager required at all times Onsite control/ management of all refuse / waste services Absolute 24/7 access for council officers / Contractors to DCC Waste Service No 2 Pump/ storage system Existing use rights of this Council asset must be G/ teed (including any associated smells//odours etc) other matters as i may raise once applicants presentation to the Hearing Committee is available Colin L Weatherall

I seek the following decision from the Council:

all matters as raised are resolved to mutual position otherwise refuse application i reconfirm my genuine interest in our Community .

Supporting documentation (file name):

No file uploaded

Supporting documentation (file name):

No file uploaded

I wish to speak in support of my submission: Yes

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

Request for Independent Hearings Commissioner(s): No

I have read and understand the Privacy statement: Yes

From: [Simpson-Wells, Poppy](#)
To: [Resource Consent Submissions](#)
Subject: FW: Submission - 1044 Brighton Road - 2022-177
Date: Thursday, 22 September 2022 03:16:27 p.m.
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[Submission on RC - DCC - RMA - LUC-2022-177 - 1044 Brighton Road.pdf](#)

Poppy Simpson-Wells

Property Manager
Corporate Solutions
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Main +64 3 441 0790
Top Floor, 10 Athol Street | Queenstown, 9300 | New Zealand
PO Box 416 | Queenstown, 9348 | New Zealand



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From: Simpson-Wells, Poppy
Sent: Thursday, 22 September, 2022 2:06 p.m.
To: reconsent.submission@dcc.govt.nz
Cc: conrad_a@xtra.co.nz
Subject: Submission - 1044 Brighton Road - 2022-177

Kia Ora DCC,

Please see the attached submission regarding Resource Consent application 2022-177.

Thank you,

Poppy Simpson-Wells

Property Manager
Corporate Solutions
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Main +64 3 441 0790
Top Floor, 10 Athol Street | Queenstown, 9300 | New Zealand
PO Box 416 | Queenstown, 9348 | New Zealand



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Rules impacting real estate agency work, incorporated in the Anti-Money Laundering legislation, apply in New Zealand from 1 January 2019. This means that before we can engage in real estate agency work we will need to collect identity information from our vendor and landlord clients

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Date: 22 September 2022

Re: APA – Dunedin City Council - 1044 Brighton Road - Resource Consent
application – Caravan park to worker accommodation conversion – LINZ Ref-
4185853

This approval is specific to the above application and is for the purposes of s95 RMA only. It is not indicative of any associated arrangement with the Commissioner of Crown Lands or other statutory approval which may be required from Land Information New Zealand in regards to the proposed activity. You are required to obtain authorisation from the Commissioner of Crown Lands in order to undertake any activities on land owned or administered by Land Information New Zealand. We look forward to receiving your application in the near future.



Stuart Chandler
Portfolio Manager
Crown Property



**DUNEDIN CITY
COUNCIL**
Kaunihera-a-rohe o Otepoti

SUBMISSION FORM 13

Submission concerning resource consent on publicly notified application under
section 95A, Resource Management Act 1991

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

Resource Consent Number: LUC-2022-177

Applicant: GK Accommodation Ltd

Site Address: 1044 Brighton Road

Description of Proposal: Conversion of former caravan park/motor camp to worker accommodation involving 46 one-bedroom portable units.

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

Your Full Name: Commissioner of Crown Lands

Postal Address:

c/o Colliers New Zealand Limited Post Code:
PO Box 416, Queenstown, 9348

Telephone: Email Address: poppy.simpson-wells@colliers.com

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

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

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

Trade competitors only:

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

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

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

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

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

Please attach other pages as required

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

Neutral.

PLEASE TURN OVER

From: [REDACTED]
To: [Resource Consent Submissions](#)
Subject: submission
Date: Tuesday, 13 September 2022 04:24:51 p.m.
Attachments: [202209131639.pdf](#)

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, 13 September 2022 4:40 pm
To: [REDACTED]
Subject: Message from "RNP0026733EED4E"

This E-mail was sent from "RNP0026733EED4E" (Aficio MP 301).

Scan Date: 13.09.2022 16:39:43 (+1200)
Queries to: [REDACTED]



DUNEDIN CITY
COUNCIL
Kaitiaki Take Kōwhiri o Ōtepoti

SUBMISSION FORM 13

Submission concerning resource consent on publicly notified application under section 95A, Resource Management Act 1991

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

Resource Consent Number:

LUC-2022-177

Applicant: GK Accommodation Ltd

Site Address:

1044 Brighton Road

Description of Proposal:

Conversion of former caravan park/motor camp to worker accommodation involving 46 one-bedroom portable units.

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

Your Full Name: Denise Marie Blair

Postal Address: [REDACTED]

9481 Post Code:

Telephone: [REDACTED]

Email Address: [REDACTED]

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

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

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

Trade competitors only:

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

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

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

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

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

I feel there will be too many people in a small space with a demand increase on facilities in Brighton.

Please attach other pages as required

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

As above
I own the property across from this site and feel the property value will be lowered due to the increase of people that are only here for a short time

PLEASE TURN OVER

From: [REDACTED]
To: [Resource Consent Submissions](#)
Cc: conrad_a@xtra.co.nz
Subject: LUC-2022-177 GK Accommodation Limited Form 13 Submission attached
Date: Monday, 19 September 2022 10:22:54 a.m.
Attachments: [19092022092737-0001.pdf](#)

Regards Elizabeth Cotton



DUNEDIN CITY
COUNCIL
Kaunihera-a-rohe o Otago

SUBMISSION FORM 13

Submission concerning resource consent on publicly notified application under section 95A, Resource Management Act 1991

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

Resource Consent Number: LUC-2022-177

Applicant: GK Accommodation Ltd

Site Address: 1044 Brighton Road

Description of Proposal: Conversion of former caravan park/motor camp to worker accommodation involving 46 one-bedroom portable units.

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

Your Full Name: Elizabeth Barbara Cotton

Postal Address:

Post Code: 9035

Telephone:

Email Address:

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

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

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

Trade competitors only:

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

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

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

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

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

See attached pages.

Please attach other pages as required

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

I am an affected long time resident of Brighton.

See attached pages.

PLEASE TURN OVER

Please have Applicant file an up to date search copy of Title OT 170/55 showing GK Accommodation Limited as registered owner.

Please attach other pages as required

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

Reduction of density - fewer units
Increased car parking on site
Management Plan for site
Rubbish Collection Control
Finite term for Resource Consent
Reduce impact on the Brighton community

Please attach other pages as required

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

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

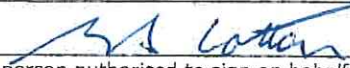
If others make a similar submission, I will consider presenting a joint case with them at a hearing:

Yes ☐ No ☐ (tick one)

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

Yes ☐ No ☒ (tick one)

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

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

Date: 19/9/2022

Notes to Submitter:

Closing Date: The closing date for serving submissions on the Dunedin City Council is Friday, **30 September 2022 at midnight**. A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Dunedin City Council. The applicant's address for service is GK Accommodation Ltd C/- Anderson & Co (Otago) Ltd, PO Box 5933, Dunedin 9054 or email conrad_a@xtra.co.nz

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be made online at <http://www.dunedin.govt.nz/rma> or sent by email to resconsent.submission@dcc.govt.nz

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

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

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

Resource Consent Application No: LUC-2022-177

Name of Applicant: G K Accommodation Limited

Location of Site: 1044 Brighton Road

Description of Application: Conversion of former caravan park/motor camp to worker accommodation involving 46 one- bedroom portable units (3m by 6m). Each unit would contain a bathroom and kitchenette. The existing dwelling would be used as manager's accommodation. The existing facilities block would be used for laundry and cooking facilities. 13 on-site parking spaces would be provided.

Addendum to Submission Form 13

1 Density

Historically 5 cabins and 29 caravan parks (20 permanent and 9 for casual use) – see page 4 para 18 of the Application.

There would have been provision for carparking on site historically although not all residents/occupiers would necessarily have had transport. Some used the bus service.

The number of 46 portable units envisaged is at the expense of providing adequate parking on-site.

The site is zoned Township and Settlement (T&S) and comprises an area of (1.0117ha) =10,881m². The following overlays are noted for the site:

- Archaeological Alert Layer overlay – eastern edge only.
- Hazard 1 (flood) Overlay– only along the river edge.
- Hazard 2 (flood) overlay – Mainly along the river edge on the western part of the site, but also includes a small part on the southern edge of the site.
- Hazard 3 (coastal) Overlay Zone – majority of the site, save for the higher ground associated with the main (existing) dwelling.

The relevant density rules are:

- Rule 15.5.2.1.i.i provides for 1 residential unit/500m² of site.
- Rule 15.5.2.1.i.ii provides for a maximum development of 1 habitable room per 100m² of site.

The land area for the site provides for:

- density of residential units of 10,081/500 = 20 residential units.
- density of habitable rooms of 10,081/100 = 100 habitable rooms.

As such, 47 residential units exceeds the permitted unit density but as each unit is only one bedroom (except for the existing dwelling), the habitable room density falls within the habitable room limit. The applicant is relying on comparing the density effects of having 46 one-bedroom units along with

the existing dwelling compared to the density of having 20 five-bedroom dwellings which is the underlying density permitted by the density rule for the site. There are, however, other triggers for consent so the "permitted baseline" must be applied carefully. The Applicant has applied the permitted baseline incorrectly in my opinion. The Applicant has tried to correct this assessment in the further information but still appears to miss the mark as the requirement for consent for a multi-unit development has been overlooked.

2 Carparking

Brighton is a village. Over the years there has been a reduction in public parking space and more residents choosing to park their vehicles on the street.

The commercial area of Brighton is centred around the dairy /shop and the coffee bar and the Brighton Club. This area is adjacent to the Applicant's site. The area is also adjacent to the one lane bridge.

The existing limited public parking is required for the shop and coffee bar including at weekends and holiday periods.

Some of the former residents of the caravan park were retired or unable to work.

The new occupiers envisaged by the Application will be able bodied workers. It is to be expected that they would want to shop for food and other items at a supermarket and the closest is at Green Island. It is likely that some of the workers may buy a cheap vehicle to use for access to Dunedin and surrounds for entertainment, socialising and shopping.

The 13 car parks proposed by the Applicant appears inadequate.

The National Policy Statement for Urban Development 2020 removed the carparking requirements nationally and, as such, there is no minimum car parking required for the development. The applicant does have a duty to demonstrate that effects of the proposal on the roading network will not occur. Parking around the dairy and café are at a premium during peak time and there is the potential that this development could increase congestion and parking competition within in this area. The Applicant states that "people living on the site will be associated with a construction company, who are anticipated to provide transport to the work site (thus resulting in a reduced level of parking demand)." As part of the conditions offered the Applicant offers conditions 4 and 5 which requires that:

Shared transportation to/from the site for employment is to be provided/arranged.

and

"No-one living on-site is to park a vehicle off-site within 300m of the entrance of the site. 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. A review clause regarding any effects associated with off-site parking"

Condition 4 appears to be quite open ended, and it is unclear how Council would be able to measure and enforce compliance of this condition with any certainty.

It would be good to have additional surety for these conditions and for the Applicant to include the parking and travel requirements within a management plan so that the occupiers of the development understand the parking constraints and that single user private motor vehicles are generally not provided for.

Although not referred to in the application, Condition 3 of the volunteered conditions also suggests that the access is reliant on approval from LINZ. It would be good for the legal right to the access to be confirmed prior to the consent being granted.

3 Rubbish Collection

The Applicant states that private arrangements for rubbish and recycling will be provided. I seek a condition that requires that this be managed collectively for the entire development as stated in the application. This should be included in a management plan for the site.

This should be a Condition if the Resource Consent is granted.

4. Enduring use of the site

The Applicant makes much of the need for the development being associated with the hospital build which is expected to take up to 8 years. The Applicant notes that once the site is no longer required as worker accommodation (as envisaged by this application), any future residential use of the site will need to comply with the relevant rules of the District Plan, or a further resource consent application will be required, which can be considered on its merits at that time. No end time frame is sought for the consent. I think it is not unreasonable to assume that the timing will be line with the finish of the hospital build.

The Applicant offers for such a clarification to be made via a Consent Note. I consider it to be more appropriate that the resource consent have a fixed term and an expiry date. Prior to the resource consent expiring, conditions of consent could require the site be restored to a permitted activity state. Future resource consent could be applied for, however, the fact that this consent would expire would ensure that limited regard could be given to the development on the site when establishing a permitted baseline for any future application.

5 Design of the units

The application does not include elevations of the proposed units. The volunteered conditions of consent include roof colours of any new buildings is to be approved by Council and a landscape management plan.

Without the elevations showing what the units will look like, it is difficult to assess the degree of effects. Both the Brighton Estuary and the Ōtakia Creek are public viewing places and consideration should be given to the views of the site from these spaces.

6 Sewage/ stormwater

I recommend that conditions of consent be requested to ensure that sewage and stormwater is appropriately managed so that there will be no adverse effects to occur to water quality or which would adversely affect public health.

7 Earthworks and construction effects

The application states that earthworks will be largely confined to the southern end of the site and will be largely associated with the provision of services and access. The Applicant does not state what the set back to a water body will be and if this setback will be achieved in compliance with the plan rules or if the earthworks will be outside of the mapped hazard 1 and 2 areas.

While earthworks are an accepted part of any site development, conditions should be included to ensure that dust and sediment are activity managed and contained within the subject site. Construction noise should be limited to reasonable hours (8am to 6pm Mon- Friday). As Brighton is a seaside town, construction works should be prohibited on Saturday, Sunday and Public holidays so that public and residential amenity is maintained.

8 Site Management

The proposed on-site management of the facility offered in the application is supported.

The application states that a service area of 20m² is proposed, due to the additional managed service areas such as recycling and rubbish, and which the Applicant suggests will result in a smaller service space requirement. The application is silent on facilities such as washing lines and storage of outdoor equipment etc. It would be helpful to have additional information regarding this. Furthermore, it would be beneficial for the Applicant to consider preparing an overall management plan for the facility.

9 Outdoor amenity space

The outdoor amenity space for 20-35 may be quite steep as it appears to finish at the bottom of the bank and is also located within the flood area. Can the Applicant confirm that this outdoor amenity space is usable and will not exceed an average vertical grade not exceeding 1:12 (vertical: horizontal) in any direction?

10 Natural Environment

The subject site is located adjacent to the Ōtakia Creek. The application does not include any assessment on the potential effects of this proposal on the Ōtakia Creek. The application states that the units will be setback 5.0 metres from the Ōtakia Creek. Rule 14.4.2 of the Regional Plan Water for Otago states that the erection or placement of any structure, other than a defence against water, within 7 metres of the margin of any lake, or within 7 metres of the top of the bank of any river, is a restricted discretionary activity. Has the Applicant applied for consent from the Otago Regional Council?

From: [Jessica Mangos](#)
To: [Planning](#)
Subject: RE: Resource Consent Submission Incomplete - Return to online form
Date: Friday, 30 September 2022 10:36:11 a.m.
Attachments: [image004.png](#)
[Submission - Dunedin City Council - Notified Resource Consent - 28.09.22.pdf](#)

Hello,

I tried to submit however it is not recognising my email address. Please see attached my submission on the notified Resource Consent application.

Please let me know if you have any questions.

Kind regards,

Jessica Mangos
Planner
Beca
DDI: 03 374 3150

Jessica.Mangos@beca.com
www.beca.com



From: planning@dcc.govt.nz <planning@dcc.govt.nz>
Sent: Friday, 30 September 2022 10:31 am
To: Jessica Mangos <Jessica.Mangos@beca.com>
Subject: Resource Consent Submission Incomplete - Return to online form

Thank-you for starting your submission on the Resource Consent application

You are able to save progress & exit as many times as you wish. Each time you use the Save Progress and Exit option an new email will be sent.

Please use this password in the text box next to the Submit button - **98163360e89da59e** in the box

Please use this link to return to the current page on the form - https://www.dunedin.govt.nz/services/resource-consents/notified-resource-consents/notified-resource-consents/current-consultation/luc-2022-177-1044-brighton-road/luc-2022-177-submission-form?SO_FORM_886997_SUBMISSION=892386&SO_FORM_886997_PAGE=1&SO_FORM_886997_ACCESSID=3b157fb6d5adf542c019b7ea15d87a

If the form does not load you may need to copy & paste the link into your browser

You must complete and SUBMIT your completed application for consideration.

Sensitivity: General

NOTICE: This email, if it relates to a specific contract, is sent on behalf of the Beca company which entered into the contract. Please contact the sender if you are unsure of the contracting Beca company or visit our web page <http://www.beca.com> for further information on the Beca Group. If this email relates to a specific contract, by responding you agree that, regardless of its terms, this email and the response by you will be a valid communication for the purposes of that contract, and may bind the parties accordingly. This e-mail together with any attachments is confidential, may be subject to legal privilege and applicable privacy laws, and may contain proprietary information, including information

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Form 13

Submission on application concerning resource consent that is subject to public notification by consent authority

Section 95A Resource Management Act 1991

To: Dunedin City Council

Submission on: Publicly Notified Resource Consent – GK Accommodation Ltd

Name of Submitter: Fire and Emergency New Zealand

This is a submission on an application on behalf of Fire and Emergency New Zealand (Fire and Emergency) on a publicly notified application from GK Accommodation Ltd for a land use consent to convert a former caravan park/motor camp to workers accommodation involving 46 one-bedroom portable units (3m by 6m). Each unit will contain a bathroom and kitchenette, and the existing dwelling will be utilised for managers accommodation.

Fire and Emergency is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (RMA).

The specific parts of the application that Fire and Emergency's submission relates to are:

- *Access for fire appliances*

Fire and Emergency's submission is:

In achieving the sustainable management of natural and physical resources under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency monitors development occurring under the RMA to ensure that, where necessary, appropriate consideration is given to fire safety and the general safety of the public.

The proposed activity should take into account the operational requirements of Fire and Emergency to adequately provide for firefighting activities in a safe, effective, and efficient manner as required by the Fire and Emergency Act 2017. This is particularly important for this resource consent application, due to the scale and number of buildings proposed which increases the risk and potential effects should a fire occur. Fire and Emergency therefore requires certainty over the details of suitable access throughout the entire site for emergency vehicles.

Fire Appliance Access

The application states that in paragraph 73 *'the proposal has been designed around the existing access easement which is 6m wide'*. This existing access easement will provide access through the site for fire appliances to be able to access majority of the units however some units will not be able to be accessed by a fire appliance. This includes Units 8 – 12 and 33- 38. Carriageway widths should be wide enough to allow fire appliances to carry out emergency operations. To accommodate a fire appliance, carriageways should

have a minimum width of 4m. This site does not allow for manoeuvrability. Fire appliances need to have the ability to turnaround without multi point turns so that the appliance can be moved quickly in an emergency. Fire appliances need to be able to achieve a full 360° turn within a 25m circle. This will not be achievable with the number of units proposed on site.

As such, this type of intensification creates a risk of fire spread therefore access to all units is critical to ensure prompt response to reduce fire spread.

Building materials

While not a RMA matter, the use of the buildings as permanent accommodation and the transport of the units on site will likely require building consent. Fire and Emergency have expressed concern in relation to the type of materials used for the buildings and how this contributes to fire spread and that prevention of fire spread is sought through appropriate fire safety requirements under the Building Act.

Fire and Emergency seek the following decision from the consent authority:

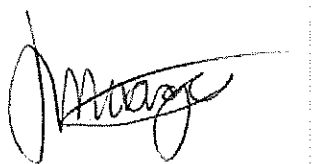
This resource consent application, being a large-scale accommodation land use activity without sufficient access throughout the site has potential implications for Fire and Emergency in terms of emergency access to the site.

Fire and Emergency therefore strongly recommend the inclusion of a consent condition that access for firefighting appliances be sufficient on site to meet the requirements outlined in SNZ PAS 4509:2008. The following condition is recommended to be placed:

- 1. That prior to the construction or habitation of any public or habitable building, adequate access, for vehicles and by foot, throughout the site shall be provided in accordance with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.*

Fire and Emergency wish to be heard in support of its submission. If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at the hearing.

Fire and Emergency do not request, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.



Signature of person authorised to sign on behalf of
Fire and Emergency

Date: 28/09/2022

Electronic address for service of person making submission: Jessica.Mangos@beca.com

Telephone: 03 374 3150



DUNEDIN CITY
COUNCIL
Kaunhera-a-rohe o Otago

Submission concerning resource consent on publicly notified application under section 95A, Resource Management Act 1991

28 SEP 2022

Business Information
Services

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

Resource Consent Number: LUC-2022-177 Applicant: GK Accommodation Ltd
Site Address: 1044 Brighton Road
Description of Proposal: Conversion of former caravan park/motor camp to worker accommodation involving 46 one-bedroom portable units.

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

Your Full Name: HARRAINE MARY MARLOW

Postal Address: [REDACTED] Post Code: 9035

Telephone: [REDACTED] Email Address: [REDACTED]

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

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

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

Trade competitors only:

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

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

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

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

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

Density
Parking
Noise
Site management.

Please attach other pages as required

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

Density:
The number of dwellings on site is too many considering the total area of the land purchased. It has half of it approximately unusable for building or living on, i.e. in the river or within the river boundary - High Flooding Zone.
Parking: other than the 13 allowed parks in the camp there will be very limited parking available to workers as - the shop - the Brighton Club & the cafe have quite a following. Residents of surrounding streets do not all have off street

PLEASE TURN OVER

parking and do not wish to have to ~~find~~ find parking elsewhere other than outside their own homes every time they come home from town etc.

Noise: For the workers doing shifts could be a problem as the club is open three nights and sometime all Sunday once a month - Sleep could be a problem. The club has live bands etc.

Site management: A line in responsible person + security for that amount of workers may be required

Please attach other pages as required

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

that all the above be taken into consideration = Brighton is a lovely reasonably quiet village and 46+ transient workers male & female would have a huge impact on the make up of this small village - School kids walk past this facility every day to school - traffic will increase and the hours these workers will be doing will effect their mental health with nowhere being made available for them to let off steam.

Please attach other pages as required

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

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

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

Yes ☐ No ☒ (tick one)

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

Yes ☒ No ☐ (tick one)

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

Signature of submitter: _____

(or person authorised to sign on behalf of submitter)

Date: 27/9/2022

Notes to Submitter:

Closing Date: The closing date for serving submissions on the Dunedin City Council is Friday, **30 September 2022 at midnight**. A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Dunedin City Council. The applicant's address for service is GK Accommodation Ltd C/- Anderson & Co (Otago) Ltd, PO Box 5933, Dunedin 9054 or email conrad_a@xtra.co.nz

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be made online at <http://www.dunedin.govt.nz/rma> or sent by email to resconsent.submission@dcc.govt.nz

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

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

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

From: [REDACTED]
To: [Resource Consent Submissions](#)
Subject: Resource consent application submission - LUC-2022-177 - 891628
Date: Monday, 26 September 2022 03:23:36 p.m.

Your details

Name:
Lyn McLaren

Organisation/On behalf of:

Postal address:
[REDACTED]

Contact phone number: [REDACTED]

Email address: [REDACTED]

Address to be used: Email

Withhold contact details: Yes

Trade Competition

I am a trade competitor for the purposes of section 308B of the Resource Management Act 1991:

I am directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition: Yes

Submission details

Your position: I oppose this application

The specific parts of the application that this submission relates to are:
Parking

My submission is:
One car park per unit is needed. You say they are not allowed to park within 300m Who is going to police this and ensure it does not impact on locals?

I seek the following decision from the Council:
Unless there is one car park per unit this application needs to be declined.

Supporting documentation (file name):
No file uploaded

Supporting documentation (file name):
No file uploaded

I wish to speak in support of my submission: No

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

at a hearing: Yes

Request for Independent Hearings Commissioner(s): Yes

I have read and understand the Privacy statement: Yes

From: [Ōtokia Creek and Marsh Habitat Trust](#)
To: [Resource Consent Submissions; conrad_a@xtra.co.nz](#)
Subject: Re: Ōtokia Trust submission for LUC-2022-177_Submission-1044 Brighton Road
Date: Friday, 23 September 2022 10:18:07 a.m.
Attachments: [LUC-2022-177-Submission-1044-Brighton-Road_Otokia Trust.pdf](#)
[6527 Otokia Creek ecological assessment FINAL 19-9-22.pdf](#)

Kia ora

The Otokia Trust made its submission yesterday but accidentally indicated to be a trade competitor. The Trust is not a trade competitor and please find the corrected submission attached. Can you pls confirm you have received the corrected version.

Thanks Viktoria

Ōtokia Creek And Marsh Habitat Trust
Restoring our native taonga



On Thu, 22 Sept 2022 at 13:05, Ōtokia Creek and Marsh Habitat Trust
<otokiustrust@gmail.com> wrote:

Kia ora
please find our submission and commissioned report attached.
Best Viktoria

Ōtokia Creek And Marsh Habitat Trust
Restoring our native taonga





DUNEDIN CITY
COUNCIL
Kaunihera-a-rahe o Otepoti

SUBMISSION FORM 13

Submission concerning resource consent on publicly notified application under section 95A, Resource Management Act 1991

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

Resource Consent Number: LUC-2022-177 **Applicant:** GK Accommodation Ltd
Site Address: 1044 Brighton Road
Description of Proposal: Conversion of former caravan park/motor camp to worker accommodation involving 46 one-bedroom portable units.

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

Your Full Name:
Ōtokia Creek and Marsh Habitat Trust

Postal Address:
25 Bath Street, Brighton, Dunedin

Post Code: 9035

Telephone: 0278521897 (Viktoria Kahui)

Email Address: otokiatrust@gmail.com

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

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

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

Trade competitors only:

I Am/Am Not (choose one) directly affected by an effect of the subject matter of the submission that—
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

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

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

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

The Ōtokia Creek and Marsh Habitat Trust has commissioned an assessment of the ecological values present at the site proposed for development of 46 one bedroom transportable units. The assessment was carried out by Wildlands Consultants and their report has been attached to this submission.

Please attach other pages as required

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

The report by Wildlands found the presence of fish (longfin eel, giant kōkopu, and other species). Currently, there is no overhanging riparian vegetation along the banks of the Ōtokia Creek along the site in question. Potential ecological effects from earthworks may include sediment runoff during construction, as well as (accidental) littering. These impacts can be ameliorated by dense riparian planting along the 5 metre setback from the water's edge, especially when undertaken prior to beginning work on the site.

The Ōtokia Creek and Marsh Habitat Trust has been established since 2020 in Brighton, and has so far planted over 4000 native plants along the Creek and Marsh. We have a small community nursery and maintain regular Facebook presence, involving the community, school and volunteers in planting days. We would like to encourage GK Accommodation to consider funding the riparian

PLEASE TURN OVER

planting along the 5 metre setback. The Ōtokia Trust has a biodiversity plan and is willing to assist the developer by
- providing advice on what species to plant according to the biodiversity plan;
- gift 100 natives towards planting;
- connect GK Accommodation with Wildwood Ecoforestry who works with the Trust;
- support GK Accommodation's efforts by providing community support (on the Trust's facebook site)
<i>Please attach other pages as required</i>

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

condition for riparian planting along the 5 meter setback from the Creek's edge to mitigate impacts of sediment runoff from earthworks and littering
<i>Please attach other pages as required</i>

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

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

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

Yes ☐ No ☒ (tick one)

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

Yes ☐ No ☒ (tick one)

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

Signature of submitter: Simon Laing (Chairperson) and Viktoria Kahui (Treasurer) **Date:** 21 September 2022
(or person authorised to sign on behalf of submitter)

Notes to Submitter:

Closing Date: The closing date for serving submissions on the Dunedin City Council is Friday, **30 September 2022 at midnight**. A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Dunedin City Council. The applicant's address for service is GK Accommodation Ltd C/- Anderson & Co (Otago) Ltd, PO Box 5933, Dunedin 9054 or email conrad_a@xtra.co.nz

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be made online at <http://www.dunedin.govt.nz/rma> or sent by email to resconsent.submission@dcc.govt.nz

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

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

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

ECOLOGICAL ASSESSMENT FOR THE POTENTIAL ŌTOKIA CREEK DEVELOPMENT



 providing
outstanding
ecological
services to
sustain
and improve our
environments



R6527

ECOLOGICAL ASSESSMENT FOR THE POTENTIAL ŌTOKIA CREEK DEVELOPMENT

Contract Report No. 6527

September 2022

Project Team:

Rose Stuart – Report author

Prepared for:

Ōtokia Creek and Marsh Habitat Trust

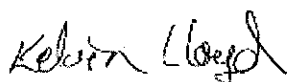
DUNEDIN OFFICE: 764 CUMBERLAND STREET, DUNEDIN 9016
Ph 03-477-2096, 03-477-2095

HEAD OFFICE: 99 SALA STREET, P.O. BOX 7137, TE NGAE, ROTORUA
Ph 07-343-9017; Fax 07-343-9018, email ecology@wildlands.co.nz, www.wildlands.co.nz

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Reviewed and approved for release by:



Kelvin Lloyd
Senior Principal Ecologist
Wildland Consultants Ltd

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1. INTRODUCTION

The Ōtokia Creek and Marsh Habitat Trust intends to submit on a development involving new accommodation on the bank of Ōtokia Creek in Brighton, Dunedin. The Trust has requested an assessment of the ecological values present at the development site from Wildlands Consultants Ltd. In addition, the Trust needs to understand the nature of any potential adverse ecological effects of the proposed development, as well as any options for managing these effects. This report comprises the ecological assessment.

2. METHODS

A desktop assessment was undertaken to assess the ecological values present in the area, and a visit to the area, in particular locations providing a good view of the proposed site was conducted to support the desktop findings.

Key information accessed includes the following online databases:

- New Zealand Freshwater Fish Database (NZFFD; Crow 2017; accessed September 2022) for records of freshwater fish (indigenous and exotic) and freshwater invertebrates within relevant waterways.
- The eBird database maintained by Cornell University (accessed August 2022), which has bird records for sites within New Zealand, was used to identify avifauna that might be present in the local area.

3. ECOLOGICAL VALUES

3.1 Flora

Vegetation is sparse at the site of the proposed development, with lawns, and only occasional planted indigenous species. There is no overhanging riparian vegetation along the banks of Ōtokia Creek. Significant ecological restoration efforts have been undertaken in the wider Ōtokia Creek area, following suggestions by Wildland Consultants (2021), increasing the variety and abundance of indigenous plant species present, and controlling weeds.

3.2 Fauna

3.2.1 Fish

There are two locations within the Ōtokia catchment where fish observations have been recorded in the NZFFD. Species observed include longfin eel (*Anguilla dieffenbachii*; At Risk-Declining), giant kōkopu (*Galaxias argenteus*; At Risk – Declining) and banded kōkopu (*Galaxias fasciatus*; Not Threatened). Records from nearby coastal streams (Taylors Stream to the north, and Fern Stream to the south) indicate that inanga (*Galaxias maculatus*; At Risk – Declining) and koura (*Paranephrops zealandicus*; At Risk – Declining) are also present within this area.

3.2.2 Avifauna

Search of the eBird database identifies 32 indigenous and 16 introduced bird species that have been observed in the Brighton area. This includes 12 species of conservation concern (Table 1).

Table 1: Bird species of conservation concern observed within the Brighton area, threat classifications taken from Robertson *et al.* 2021.

Common Name	Scientific Name	Threat Status
White heron/kōtuku	<i>Ardea modesta</i>	Threatened-Nationally Critical
Black-fronted tern	<i>Chlidonias albostratus</i>	Threatened-Nationally Endangered
South Island pied oystercatcher	<i>Haematopus finschi</i>	At Risk-Declining
Variable oystercatcher	<i>Haematopus unicolor</i>	At Risk-Recovering
Black stilt/kakī	<i>Himantopus novaezelandiae</i>	Threatened-Nationally Critical
Red-billed gull	<i>Larus novaehollandiae scopulinus</i>	At Risk-Declining
Otago shag	<i>Leucocarbo chalconotus</i>	Threatened-Nationally Increasing
royal spoonbill	<i>Platalea regia</i>	At Risk - Naturally uncommon
Sooty shearwater	<i>Puffinus griseus</i>	At Risk-Declining
White-fronted tern	<i>Sterna striata striata</i>	At Risk-Declining
Spotted shag	<i>Stictocarbo punctatus punctatus</i>	Threatened-Nationally Vulnerable
Shy mollymawk	<i>Thalassarche cauta steadi</i>	At Risk-Declining

3.2.3 Environmental DNA observations

The Otokia Trust has previously completed an environmental DNA analysis to identify species present within the creek. Environmental DNA can observe the presence of any taxa within the local habitat, so gives a wide picture of the community composition. 134 taxa observations were made, of which 39 were at species level, and 28 to genus level. This has identified the presence of several taxa not observed in the desktop surveys.

Fish

In addition to the species known to be present from NZFFD records, Environmental DNA recorded the presence of shortfin eel (*Anguilla australis*; Not Threatened), redfin bully (*Gobiomorphus huttoni*; not Threatened), and common bully (*Gobiomorphus cotidianus*; Not Threatened).

Birds

The EDNA records observed four bird species, one native and three introduced, none of these were additional to those identified from in the eBird search.

Other Taxa

Several invertebrate taxa were identified: molluscs including *Potamopyrgus* and *Physella* snails, and the freshwater bivalve *Pisidium hodgei*; insects including two species of aphid and the caddisfly *Polyplectropus puerilis*; there were also several lesser-known taxa identified from invertebrate groups including oligochaetes, crustaceans, cnidarians and platyhelminths. Overall, these results illustrate a diverse invertebrate community.

3.3 Hydrology

The Ōtokia Creek contains a variety of hydrological features, providing value to species that utilise the area.

Approximately 450 metres upstream of the location of the proposed development is the beginning of an area of swamp and shallow water wetland habitat. Nationally, wetland area has undergone significant decline in extent, due to anthropogenic impacts such as drainage and clearing (Ausseil *et al.* 2008); consequently, wetlands are now better protected by regulations in the National Environmental Standards for Freshwater (NES-F) and policy in the National Policy Statement for Freshwater Management (NPS-FM).

The lower extent of Ōtokia Creek is estuarine in nature. Tidally influenced water level fluctuations occur up to 2.5 kilometres from the mouth, and the salt wedge can extend as far as 1.5 kilometres into the creek during high tide. This salt wedge feature may make the creek suitable for inanga spawning if appropriate riparian cover is established (Taylor 2002). A unique feature of the creek is that in several deep pools the creek bed lies below sea level, resulting in permanent pockets of water with an increased salinity.

The creek itself is intermittently disconnected from the sea, as storms can create a sand barrier, preventing outflows for periods of time. This creates a backing up of water within the creek and wetland, and increases the accumulation of sediment, nutrients, and other detritus, typically leading to a decline in water quality when the mouth of the creek is blocked.

4. POTENTIAL ECOLOGICAL EFFECTS

While the development proposal states that the proposed accommodation units are impermanent and transportable, they all contain kitchen and bathroom facilities. It is therefore understood that some earthworks will be required to install plumbing connections to the units (for water supply and waste removal). Earthworks unavoidably disturb the ground and if this coincides with rainfall events it is likely that an amount of sediment will be transported in runoff into the Ōtokia Creek. This is of particular concern due to the lack of riparian vegetation and the smooth abrupt bank edges, which provide little capacity to retain or filter runoff.

There are anecdotal observations of previous residents of this property disposing of rubbish and other wastes into the creek. The unimpeded access to the creek likely enabled these behaviours; which could have been deterred by the presence of a

vegetation buffer or fencing along the riparian margin, limiting the ease of access. Additionally, there is the potential for accidental littering and dispersal of rubbish into the creek and its surrounding area. Even with the best intentions this can happen, for example through wind gusts disrupting bins.

5. MITIGATION

Riparian planting is suggested as the best means of mitigating the potential ecological effects of this development. There are requirements for a five metre setback from the water's edge, so this area is already set aside and available to be planted. Dense riparian planting, particularly if established prior to the beginning of work on the site, will reduce the potential impacts of sediment runoff. Dense vegetation on riparian margins may also deter potential undesired behaviour of residents, and may be able to trap accidental litter, making it easier to collect before it can enter Ōtokia Creek and the wider ecosystem.

The planting and maintenance of riparian vegetation will also enhance the ecological values of the site, by providing shade and cover of the creek. This generates habitat changes that will be favourable for both indigenous fish and bird species in the area.

Riparian planting should comprise only ecologically appropriate plant species, such as those listed for riparian sites by Wildland Consultants (2021), and should be governed by an ecological management plan.

ACKNOWLEDGMENTS

The Ōtokia Creek and Marsh Habitat Trust is thanked for providing access to properties where the Ōtokia Creek and proposed development site could be observed, as well as for providing EDNA findings, and hydrological observations.

REFERENCES

- Ausseil A., Gerbeaux P., Chadderton W., Stephens T., Brown D., and Leathwick J. 2008: Wetland ecosystems of national importance for biodiversity: criteria, methods and candidate list of nationally important inland wetlands. Department of Conservation. *Landcare Research Contract Report LC0708/158*. 171 pp.
- Dunn N.R., Allibone R.M., Closs G.P., Crow S.K., David B.O., Goodman J.M., Griffiths M., Jack D.C., Ling N., Waters J.M., and Rolfe J.R. 2018: Conservation status of New Zealand freshwater fishes, 2017. *New Zealand Threat Classification Series 24*. Department of Conservation, Wellington. 11 pp.
- Grainger N., Harding J., Drinan T., Collier K., Smith B., Death R., Makan T., and Rolfe J. 2018: Conservation status of New Zealand freshwater invertebrates, 2018. *New Zealand Threat Classification Series 28*. Department of Conservation, Wellington. 25 pp.

- Robertson H.A., Baird K., Dowding J.E., Elliott G.P., Hitchmough R.A., Miskelly C.M., McArthur N., O'Donnell C.F.J., Sagar P.M., Scofield R.P., and Taylor G.A. 2021: Conservation status of New Zealand birds, 2021. New Zealand Threat Classification Series 36. Department of Conservation, Wellington. 43 pp.
- Taylor M. 2002: The National Īnanga Spawning Database: trends and implications for spawning site management. Wellington: Department of conservation. *Science for Conservation* 188. 37 pp.
- Wildland Consultants 2021: Strategic biodiversity plan for the Otokia Creek and Marsh Habitat Trust, Brighton, Otago. *Wildland Consultants Ltd Contract Report No 5770*. Prepared for the Otokia Creek and Marsh Habitat Trust. 26 pp.



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ecology@wildlands.co.nz

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New Zealand

Regional Offices located in
Auckland, Hamilton, Tauranga,
Whakatane, Wellington,
Christchurch and Dunedin

ECOLOGY RESTORATION BIODIVERSITY SUSTAINABILITY

www.wildlands.co.nz

From: [REDACTED]
To: [Resource Consent Submissions](#)
Cc: [Conrad Anderson](#)
Subject: Resource Consent submission regarding 1044 Brighton Road, Brighton
Date: Friday, 23 September 2022 01:26:39 p.m.
Attachments: [LUC-2022-177-Submission-Form-1044-Brighton-Road.pdf](#)

DCC Resource Consents Team

Tēnā koutou

Please see attached submission form regarding conversion of former caravan park to worker accommodation at 1044 Brighton Road.

kia pai tō rā whakatā

Kā mihi

Simon Laing and Anne-Claire Mauger

[REDACTED]

**SUBMISSION FORM 13**

Submission concerning resource consent on publicly notified application under section 95A, Resource Management Act 1991

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

Resource Consent Number: LUC-2022-177

Applicant: GK Accommodation Ltd

Site Address: 1044 Brighton Road

Description of Proposal: Conversion of former caravan park/motor camp to worker accommodation involving 46 one bedroom portable units.

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

Your Full Name:

Simon Andrew Laing & Anne-Claire Mauger

Postal Address:

Post Code: 9035

Telephone

Email Address:

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

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

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

Trade competitors only:

I ~~Am~~/Am Not (choose one) directly affected by an effect of the subject matter of the submission that— (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

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

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

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

- | | |
|---|---|
| - Accommodation unit density | - No consideration of best practice for worker camp design |
| - Lack of communal/recreational areas | - No added security to protect vulnerable community members |
| - Inadequate carpark provision | |
| - No policy on "motelling" | |
| - No accountability to community complaints | |

Please attach other pages as required

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

See full submission pages 4 - 5 of this document.

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Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be made online at <http://www.dunedin.govt.nz/rma> or sent by email to resconsent.submission@dcc.govt.nz

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

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

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

We appreciate the opportunity to submit on this proposal as immediate neighbours. We are not opposed to the development of worker accommodation at the former Brighton Caravan Park, which has most recently been used for long term rental accommodation, and we believe a positive outcome is possible with good design practice and planning. It is our hope that the Non-Resident Workers (NRWs) in the camp come to participate in the wider community and integrate into our clubs and societies and enjoy our beautiful environment in a positive way. This can only be achieved by creating a sense of belonging and community within the camp. Unfortunately our own experiences, which include over a decade of living in many different workers camps in Australia, has taught us that these facilities, if not well designed and managed, are often places of very poor mental health, drug and alcohol abuse, and unsafe for women. The nature of fly in, fly out (FIFO) worker accommodation is likely to change the fabric of our community. People that are accommodated in these facilities are present in a town because of very different reasons than paying tourists or people that have chosen to live there. They are compelled to reside there to meet workplace requirements rather than choosing to and spend long periods of time away from their partners and children, which is a well reported on source of stress for FIFO workers. There will be a substantial social impact from this development.

- Accommodation unit density

We believe the proposed unit density of 46 units on a site of this size is too high. The density of the units does not allow for the provision of areas for residents to gather and socialise, which is important for maintaining a safe and healthy culture within a worker camp. Residents will be forced to remain isolated in their rooms which will lead to poor outcomes for their mental health and general attitudes. The high density of units also serves to concentrate a particular demographic in a small area of the township. Residents are very likely to be working age and mostly men, as the construction industry is overwhelmingly dominated by men. This may discourage or intimidate women and children from walking through the area as they do now. There is a dairy beside the site which is a popular place for local children to walk to and congregate there.

- Lack of communal areas

Without any provision of both indoor and outdoor communal entertainment areas on the site, residents that wish to share company, food and drinks together will have no option, but to leave the camp and cross the road where there is a public barbeque area. It is not difficult to imagine a scenario where camp residents spend every Saturday or Sunday afternoon congregating in 1 of the 2 public barbeque areas in Brighton with a few beers and some food, monopolising these public facilities. An even worse outcome would be that residents have no after work entertainment option but to stay in their rooms using internet and television, alone. This will lead to a feeling of isolation and poor mental health outcomes that is likely to encourage alcohol abuse and other unwanted behaviours. It is well understood by those that have experience building and operating workers camps in Australia that a healthy, highly social culture within a camp is critical to encouraging a sense of belonging, which in turn creates a good culture of mutual respect within the camp community and towards the larger community as a whole.

- Inadequate carpark provision

Residents should be encouraged to get out and about and explore the larger Dunedin area, and contribute to the local economy. The public transport connection from Brighton to Dunedin is poor, as buses currently run on a reduced timetable, are frequently behind schedule, and 2 separate buses are required to get to Dunedin City. Cycling from Brighton to Dunedin currently involves sharing a narrow road with cars travelling at high speed. Cars are the only suitable mode of transport. Camp residents should be encouraged to have their own transport so that they can enjoy different hobbies and activities based on their individual pursuits. Ridesharing in the camp minivans will not always be appropriate when one person wants to hike through the native forest walk along the river from Taieri Mouth and others want to visit Otago Museum or Port Chalmers. At least 1 in 3 residents should have their own carpark. FIFO camps in Australia have large carparks and residents usually share cars between a few people.

- No policy on "motelling"

Motelling is the practice of having camp residents check out of their rooms as they go back to their home towns and families on break, and then have to check in again on return to work and may be allocated a different room from that which they left. This creates a sense of displacement and does nothing to encourage a sense of belonging within the camp community,.

I refer to the Code Of Practice for “Mentally healthy workplaces for fly-in fly-out (FIFO) workers in the resources and construction sectors”, produced by the Government of **Western Australia**, Department of **Mines, Industry Regulation and Safety** which is attached to this submission, particularly section 5.4 Accommodation, page 12 which states: The type, design and quality of accommodation and activities available may be used to support strategies for mentally healthy workplaces by providing controls to reduce the risks of harm associated with psychosocial hazards and risk factors such as:

- stress
- fatigue
- loneliness.

For example, where practicable, accommodation arrangements should be predictable to reduce stress. Those with permanent rooms report better mental health and wellbeing outcomes than other accommodation arrangements (e.g. motelling, changing in the middle of a roster).

To reduce stress and fatigue, administrative processes should be designed for efficiency (e.g. streamlined check in and check out) and to minimise disruptions to personal time (e.g. appropriate cleaning schedules).

Accommodation villages should be designed to encourage socialisation while also considering requirements for peace, privacy and safety.

To minimise sleep disturbance as far as practicable, sleeping quarters should be located away from communal areas, with comfortable beds, sound- proofing, air conditioning and blackout curtains.

Those responsible for recreational activities (e.g. active lifestyle coordinators) should promote recreational activities with a clear social element (e.g. barbecues, social sports, movie nights) that are associated with better mental health and wellbeing.

- No accountability to community complaints

The proposal states that the camp managers contact details will be passed onto immediate neighbours and displayed on the camp gate. While this is prudent it does not ensure that community concerns and complaints will be addressed, as the manager may themselves be uncooperative or for some reason unable to respond. Community complaints should be responded to, in writing, outlining what steps have been taken to resolve the issue, within 10 working days. This would allow camp residents who were the subject of the complaint to return from their rostered break if they were away. This should be a condition of continuing to operate the camp. This will incentivise that complaints be dealt with in a timely manner.

A community liason group should also be established that meets regularly with the camp manager. This would help identify issues before they become problematic and deal with them in the spirit of collaboration.

- No consideration of best practice for worker camp design

FIFO worker camps have been built and operated with varying degrees of success by many organisations throughout Australia, however New Zealand has had little or no experience with this type of work/life arrangement. There are many examples of conflict between local communities and non-resident workers (NRW) and much research has been done across there on best practice for designing and operating these camps. This proposal does not reference any research or code that has assisted in the design, and it should be demonstrated that this has occurred. Examples include:

1. The University of Queensland’s research paper; **Factors linked to the well-being of Fly-In-Fly-Out (FIFO) workers**

https://www.csr.uq.edu.au/publications?task=download&file=publication_file_2&id=426

2. Code Of Practice for “Mentally healthy workplaces for fly-in fly-out (FIFO) workers in the resources and construction sectors”, produced by the Government of **Western Australia**, Department of **Mines, Industry Regulation and Safety**

<https://www.commerce.wa.gov.au/publications/mentally-healthy-workplaces-fly-fly-out-fifo-workers-resources-and-construction-sectors>

- No added security to protect vulnerable community members

Unaccompanied local women and children frequently walk through the area near the camp. At times where camp residents may reasonably be expected to engage in adult entertainment such as drinking on site or at the nearby social club bar on Friday and Saturday evenings, professional security should be required to be present if considered necessary by the community liason group, or if complaints have previously been made by community members.

I seek the following decision from the council:

- Accommodation unit density

Accommodation unit density limited to 30 units

- Lack of communal/recreational areas

A minimum of two outdoor communal areas with seating and barbeque facilities, and one communal indoor lounge

- Inadequate carpark provision

1 carpark for every 3 accommodation units

- No policy on "motelling"

No motelling to take place for workers that expect to be returning to the camp on a regular basis

- No accountability to community complaints

1. A community liason group to be established
2. Complaints must be replied to within 10 working days, in writing, outlining steps taken to resolve issue. This will be a condition of continuing to operate.

- No consideration of best practice for worker camp design

Council should require evidence that the camp has been designed with consideration to research on similar facilities and their impacts on local communities.

- No added security to protect vulnerable community members

Security guard should be required on Friday and Saturday evenings. This condition may be subject to review by the community liason group so that it could be discontinued if deemed unnecessary, or reinstated in the future.

From: [Viktoria Kahui](#)
To: [Resource Consent Submissions](#)
Subject: RE: Submission regarding LUC-2022-177_Submission-1044 Brighton Road
Date: Friday, 23 September 2022 10:13:36 a.m.
Attachments: [LUC-2022-177-Submission-Form-1044-Brighton-Road_Vkahui.pdf](#)

Kia ora

I made a submission yesterday but accidentally indicated that I am a trade competitor – which I am not! Please find my corrected submission attached.

Apologies, can you please confirm you got the correct submission indicating I am NOT a trade competitor.

Best Viktoria

Viktoria Kahui
Senior Lecturer Economics
University of Otago, New Zealand
<https://www.otago.ac.nz/economics/staff/otago077906.html>

From: Viktoria Kahui
Sent: Thursday, 22 September 2022 1:08 pm
To: resconsent.submission@dcc.govt.nz
Subject: Submission regarding LUC-2022-177_Submission-1044 Brighton Road

Kia ora

Please find my personal submission regarding the development on 1044 Brighton Road attached.

Best Viktoria

Viktoria Kahui
Senior Lecturer Economics
University of Otago, New Zealand
<https://www.otago.ac.nz/economics/staff/otago077906.html>



DUNEDIN CITY
COUNCIL
Kaunihera-a-rohe o Otago

SUBMISSION FORM 13

Submission concerning resource consent on publicly notified application under section 95A, Resource Management Act 1991

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

Resource Consent Number: LUC-2022-177

Applicant: GK Accommodation Ltd

Site Address: 1044 Brighton Road

Description of Proposal: Conversion of former caravan park/motor camp to worker accommodation involving 46 one-bedroom portable units.

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

Your Full Name:

Viktoria Kahui

Postal Address:

[Redacted]

Post Code: 9035

Telephone:

[Redacted]

Email Address:

[Redacted]

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

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

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

Trade competitors only:

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

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

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

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

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

I oppose the number of planned one bedroom transportable units. Rule 15.13: Non complying activities does not support the density of residential units.

Please attach other pages as required

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

I believe the social impact of having 46 one bedroom transportable units is untenable for a small township such as Brighton, especially at the proposed location in direct vicinity of the school and the Brighton Club where alcohol is served. While some of the potential impacts such as noise, disorderly behaviour and traffic may be ameliorated by the presence of an on-site manager and other conditions put in place by the developer, I would like to see the number of units reduced to no more than 30 one bedroom transportable units. This will help mitigate the impact of having such a large number of single people present in the township of Brighton.

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