

**BEFORE THE WESTLAND DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991 ('the Act')

**AND** of RC 160034, an application for resource consent to construct  
and operate a campground at Davie Street, Hokitika

**IN THE MATTER**

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**EVIDENCE OF LYNDA WATSON**

**ON BEHALF OF TUFFY INVESTMENTS LIMITED**

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**Adderley Head**  
Paul Rogers  
15 Worcester Boulevard, Christchurch 8013  
PO Box 16, Christchurch 8140  
Tel 03 353 0231  
Fax 03 353 1340  
Email paul.rogers@adderleyhead.co.nz

## **INTRODUCTION**

- 1 My full name is Lynda Maree Watson. I am a Registered Professional Surveyor from Coastwide Surveys in Hokitika.
- 2 I hold a Bachelor of Surveying from the University of Otago, and I am a Licensed Cadastral Surveyor. I am a member of the New Zealand Institute of Surveyors, and the Consulting Surveyors of New Zealand. I have 29 years of experience in surveying, and I have been a director and principal of Coastwide Surveys Ltd for eighteen years. During this time I have prepared a large number of subdivision and landuse consent applications, mostly in Westland District. I am very familiar with the Westland District Plan, its objectives and policies and its rules.
- 3 I am familiar with the subject site and surrounding area, and I have carried out site visits prior to and during the course of preparing the application and this evidence.
- 4 I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where I state that I am relying on the evidence of another.
- 5 The data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions.
- 6 I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.
- 7 In addition to my technical qualifications and planning experience I have also participated in camping around New Zealand on a regular basis.

## **SCOPE OF EVIDENCE**

- 8 In my evidence I address the following issues:
  - 8.1 Background to the proposal
  - 8.2 The Proposal
  - 8.3 The Site and Existing Environment
  - 8.4 Planning Assessment
  - 8.5 Permitted Baseline
  - 8.6 Effects Assessment

- 8.7 Positive Effects
- 8.8 Principal Areas of Contention
- 8.9 Objectives and Policies
- 8.10 Part 2 RMA
- 8.11 Response to Submissions
- 8.12 Proposed Conditions

#### **EXECUTIVE SUMMARY**

- 9 Tuffy Investments Limited have lodged an application for resource consent to construct and operate a campground at Davie Street, Hokitika. There has been on-going consultation with the Council which has resulted in amendments to address concerns raised or to provide additional information. The Applicant has also enhanced the design of the proposal through landscaping in response to submitter concerns.
- 10 The site is zoned mixed residential in the District Plan, which provides for the intermingling of land use activities.
- 11 The proposed activity is a non-complying activity under the Plan due to the ground gross floor area of the non-residential buildings and the proposed sign exceeding the maximum permitted size.
- 12 Section 104(2) of the Act provides a discretion to Council (for the purposes of forming an opinion as to actual or potential effects) to disregard any adverse effects of the proposed facility on the environment if the District Plan permits an activity with that effect. I consider that a non-fanciful activity that could occur on the site as of right is between 20-30 residential dwellings. In my opinion this scenario provides a permitted baseline activity and there are several effects that would arise from this activity that can be discarded in relation to the current proposal.
- 13 Once the permitted baseline is applied, the potential effects that remain are, noise and effects on residential character and amenity.
- 14 My opinion is that the potential effects are less than minor as explained in the body of my evidence.
- 15 I also consider there to be significant positive effects from the proposal including employment, enhancing and supporting the tourism industry in Hokitika, and upgrade of Davie Street.

- 16 Expert conferencing with Ms Hollis (Council Reporting Officer) narrowed potential issues into 5 headings – permitted baseline, noise, privacy, residential amenity and signage. The Applicant has worked with experts to mitigate these potential effects through conditions, landscaping and amended design. I consider that the proposal does not generate any adverse effects that are more than minor.
- 17 I also consider that the proposal is consistent with the Objectives and Policies of the Plan, and Part 2 of the RMA.
- 18 I propose a set of conditions with my evidence, attached as Appendix C.

### **BACKGROUND TO THE PROPOSAL**

- 19 An initial site visit and pre-application meeting was held in February 2016, with Rebecca Beaumont, Vivek Goel and Eddie Newman attending for Council, and Evan Jones and Lynda Watson attending for Tuffy investments. Following that meeting, a draft application and stormwater assessment were submitted to Council on 1 March 2016 for feedback.
- 20 Following further consultation with Council, the application was submitted to Council in May 2016. The Council limited notified the application to 25 neighbouring properties in September 2016.
- 21 There have been many meetings and discussions with various Council staff and Council's consultant planner (Ms Hollis) to discuss issues in relation to the proposal, and provide clarification on information requirements, particularly in relation to the stormwater management.

### **PROPOSAL**

- 22 The proposal is to operate a commercial camp ground on the site, which is Lot 1 DP 349111, located at the northern end of Davie Street. The camp ground as proposed could provide accommodation for up to 252 people over a total of 67 units and sites.
- 23 The proposal is depicted on the plans attached as **Appendix A**, and is fully described in the application. A summary of the main features is as follows:
- A manager's residential dwelling and garage (shown as "house" on the site plan) together with a reception area and shop (shown as "shop" on the site plan) and a utilities building. The reception/shop will have a canopy which extends out over the internal road. These buildings are all sited in the south-west corner of the site, close to the entrance from Davie Street. The dwelling and garage will have a ground floor area of 247m<sup>2</sup> and a maximum height of

4.1m. The reception/shop and utilities buildings will have a total ground floor area of 157m<sup>2</sup> and a maximum height of 5.5m.

- Four self-contained motel type units (shown as Ensuite Units on the site plan), including one which is wheel-chair accessible. These units each have a ground floor area of 32m<sup>2</sup>, and a maximum height of 3.6m.
- Six self-contained double units, including one which is wheel-chair accessible. These units will be built as one block, with a total ground floor area of 260m<sup>2</sup> and a maximum height of 3.6m.
- Nine cabins, shown on the site plan as 6 cabins and 3 super standard cabins. The cabins each have a ground floor area of 16m<sup>2</sup>, and the super standard cabins each have a ground floor area of 24m<sup>2</sup>, giving a total ground floor area of 168m<sup>2</sup>. All of the cabins will have a maximum height of 3.2m.
- A central communal area with a children's playground, TV lounge, games room, kitchen and dining area, outdoor barbecue area, laundry, toilets and showers. The TV/Dining/Games building will have a total ground floor area of 285m<sup>2</sup> and a maximum height of 5.0m. The building labelled as amenities on the site plan will contain separate male and female toilets and showers, as well as two unisex wheelchair accessible toilets showers and a laundry area. This building will have a ground floor area of 140m<sup>2</sup> and a maximum height of 4.0m.
- 22 powered sites and 26 tent sites with no power will be established around the western, northern and central parts of the site, and a campervan waste disposal point will be provided. The powered sites are spacious, being a minimum of 8m wide by 13m long. It is anticipated that these sites will mostly be used by campervans and caravans, however they may also be used by tents. The non-powered sites are 8m by 6.7m. It is anticipated that these sites will mostly be used by tents, however they may also be used by basic campervans that do not require an electricity connection.
- A circular road will be constructed to provide access around the site, and hard stand areas will be provided for parking within the site.
- Lighting will be provided around the site, particularly around the access roadway, communal areas, and amenity block. All units and cabins will have an outside light at the doorway, facing the access roadway. All lights will be downward facing, so that there is no glare directed off-site. The lighting will be appropriate for the residential area. The concept design calculations show that all lighting established within the site shall be positioned and orientated such that the maximum lux spill to any adjoining residential property will be 5 lux. The concept plan for the exterior lighting, prepared by Anton Kleyburg of Micon

Engineering (1995) Ltd, was attached to the application as Appendix H. An amended concept plan is attached as Appendix B, this has been updated for the change in location of the proposed access from Davie Street.

- Stormwater – The open drains that existed through the site have been filled, and a stormwater management plan has been prepared by Mr Bryce Weal. In summary the stormwater disposal system for the campsite property, and for the stormwater from the existing piped outlet from Heenan Place, is by soakage trenches and soakpits. The stormwater management will result in a reduction in the overall volume of stormwater entering the Council reticulation system
- Services – the campground will be connected to the Hokitika water supply, the connection will be a commercial supply and will include backflow prevention. The site will be connected to the Hokitika sewerage system. The site will also be connected to electricity and telecommunications, connections will be underground.
- Access will be from Davie Street. The access will be formed to 7m wide. The indicative proposed access from Davie Street is shown on the site plan. A full access design will be submitted to Council for approval prior to the access being formed and sealed. Council have indicated that Davie Street will require some widening and footpath installation. The existing road formation of Davie Street has a sealed width of 7.0-7.5m. It is proposed that the rest of Davie Street, to the camp ground entrance, also be formed to a carriageway width of 7.0m, to comply with NZS 4404:2010 Table 3.2 E12. A 1.5m wide footpath would be installed on the east side of Davie Street, to provide for the additional pedestrian traffic likely to be generated by the campground.
- Signage: One large sign will be placed at the entrance to the campground, in the approximate location shown on the site plan. The final location of the sign will be confirmed with Council as part of the entranceway design. This sign will be a 3m long by 1m high, sited 0.4m above the ground. The purpose of this sign will be to make it clear where the entry to the camp ground is, and direct people towards the office parking area. The sign will have up-lighting from the ground. The wording of the sign will be finalised by the camp manager when appointed. A diagram of the sign is included in Mr Craig’s evidence.

There will be other smaller signs throughout the site, as determined by the camp manager as necessary to point out the facilities, including a site map opposite the office. These signs will not be visible from outside the site, and therefore are not covered by the District Plan rules.

The off-site sign that was included in the application has been dropped from the proposal.

- Landscaping will be carried out on site, in accordance with the landscape plan provided by Mr Craig. This will create a pleasant environment within the camp, and provide some screening for neighbouring properties.
  - The northern end of the site contains an area of native bush rising on a slope to Airport Drive. This area of bush adjoins Recreation Reserve (Green Belt) on both sides. There will be no development on the bush-covered slope as a result of this proposal.
- 24 The site plan attached as Appendix A shows an indicative layout of the facilities, and the proposed units on the site. The applicant wishes to retain some flexibility in the consent, to allow for proposed camping sites to be changed from one type to another in the future, to allow for demand, for example tent sites changed to powered sites. These changes would not alter the total capacity of the development.

## **THE SITE AND EXISTING ENVIRONMENT**

### The Site

- 25 The site is 2.5070 ha, situated at the end of Davie Street. The site is generally flat, with an area of bush on a steep terrace at the northern end. The flat area has been cleared and gravelled, and there are some concrete foundations in place.

### The Surrounding Area

- 26 The site is situated within a residential area. The surrounding properties are all residential properties, except for 180 Rolleston Street which contains two dwellings that are rented as commercial holiday accommodation.
- 27 Most of the adjoining sites contain single dwellings, with associated garages and sheds. Other than 180 Rolleston Street, the only other property that contains two dwellings is at 1 Heenan Place.
- 28 The surrounding residential buildings are a mix of single level and two storey buildings, of various materials and styles.
- 29 The site also adjoins an area of bush, which is Council Recreation Reserve (Green Belt). There are more residential properties on the terrace above the site and above the Recreation Reserve.
- 30 Mr Craig has included a more detailed assessment of the existing environment in his evidence.

## PLANNING ASSESSMENT

### District Plan Rules

- 31 The site is within the Residential Mixed Zone of the Hokitika Policy Unit. The District Plan states "*The Residential Mixed zone incorporates the established residential areas as well as potential areas for growth around the hospital to the North and the racecourse to the northeast. A flexible approach has been adopted for the residential areas which allows a wide range of activities to potentially locate in the zone. However, the primary intention is to retain the character and integrity of the existing residential area and therefore residential activities are encouraged, and other activities should, in most cases, be related to a residential activity on the same site. Standards are set to ensure the residential amenities are protected, for example large buildings require a resource consent.*"
- 32 The flexible approach in the zone means that rather than defining or limiting the activities that are permitted in the zone, the District Plan defines a Discretionary Activity as: "*Any residential, recreational, commercial, industrial or agricultural activity which complies with the standards for discretionary activities for the zone*".
- 33 These standards represent the level of effects that are considered to be acceptable for an activity in this zone.
- 34 Rule 5.2.2.1 states that any activity that does not fall within the permitted, controlled or discretionary categories is deemed to be a non-complying activity.
- 35 These rules list built form standards including height of buildings, site coverage, building length, outdoor space requirements, hours of operation and noise.
- 36 Although the proposal satisfies many of these standards for a discretionary activity listed in Table 5.2 of the Plan, it does not meet the following:
- 5.2(b) Gross Ground floor area – Maximum for non-residential activities: 350m<sup>2</sup>:
  - 5.2(k) Signs – Maximum per site: 2m<sup>2</sup>
- 37 Therefore the proposal is a non-complying activity.

### **Decision Making Context**

- 38 When considering an application for non-complying activity consent, Section 104D Resource Management Act 1991 provides that:



(1) ..... a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either—

(a) the adverse effects of the activity on the environment (other than any effect to which section 104(3)(a)(ii) applies) will be minor; or

(b) the application is for an activity that will not be contrary to the objectives and policies of—

(i) the relevant plan, if there is a plan but no proposed plan in respect of the activity;

(2) To avoid doubt, section 104(2) applies to the determination of an application for a non-complying activity.

- 39 Section 104(2) of the Resource Management Act 1991 states that in considering actual and potential effects on the environment, a consent authority may disregard an adverse effect of the activity on the environment if the Plan permits an activity with that effect – known as the ‘permitted baseline’.

#### **PERMITTED BASELINE**

- 40 Section 104(2) of the Act provides a discretion to Council (for the purposes of forming an opinion as to actual or potential effects) to disregard any adverse effects of the proposed facility on the environment if the District Plan permits an activity with that effect. This requires an assessment of the adverse effects of a non-fanciful permitted activity that could be established on the site. If the adverse effects of the proposal can be shown to be the same or no greater than those of a non-fanciful activity permitted by the District Plan, then they may be disregarded.

- 41 The Residential Mixed zone provides for a range of permitted activities, including residential, recreational or agricultural activities as long as they comply with the standards listed in Table 5.1. The District Plan allows for a dwelling per 300m<sup>2</sup> of allotment, as a permitted activity. Given the large size of the site, in theory, 70 residential dwellings could be built on the site. However some of the site would be taken up in providing access to these dwellings, so in my opinion a non-fanciful proposal would be for 20-30 residential dwellings for stand-alone dwellings. These dwellings would need to meet the permitted standards in the plan, which allows for dwellings to be up to 9 metres in height, as a permitted activity, so long as they comply with recession plane requirements. As an example a three storey apartment complex could be designed as a permitted activity on the site. To meet recession plane requirements it could be 4.55 – 9.3 metres from the boundaries, depending on the direction of the boundary. Lower

level dwellings could be situated 3 metres from boundaries, and up to 1.5 metres from one side boundary, as a permitted activity.

42 I consider this is scenario represents a useful comparison with regard to several elements of the proposal. I note that Ms Hollis agrees with multiple residential dwellings being located on the site as a permitted baseline activity. I also agree with her that 40-50 dwellings would be at the higher end of a development where all titles were held in one certificate of title and could be considered fanciful.

43 While a subdivision into separate residential titles is a possible (and likely) use of the site, subdivision is a controlled activity in this zone, and cannot be considered as a permitted baseline activity.

44 I note also that the bush adjoining the site could be cleared as a permitted activity. However I consider this unlikely due to the steep nature of the terrace.

45 In my opinion the following effects fall within the permitted baseline on the site:

- Visual effects from the buildings
- Traffic generation
- Lighting
- Privacy

46 Ms Hollis notes that she considers the visual effects of the buildings, and traffic generation of up to 80 vehicle trips and associated effects on the roading network fall within the permitted baseline.

47 Ms Hollis does not think that effects on privacy can be considered similar between the permitted baseline scenario and the current proposal. I disagree. Under the permitted baseline, residential dwellings built on the site can be two storey, and can be within 3m of the boundary. I consider that the effects on privacy of having a dwelling that can potentially overlook the neighbours are significantly greater than the effects of people in campervans and caravans much further away from the boundary. I also consider that the landscape plan for the campground addresses the concerns about privacy outlined in the S42A. Mr Craig states "the issue of privacy and outlook, particularly from elevated dwellings and living areas will be satisfactorily addressed by the proposed landscaping.

48 In my opinion the following potential effects that remain after applying the permitted baseline is

- Noise

- 49 The total capacity of the site as a campground is 252 people. At an average capacity of 40%, the number of people that could be on site is around 100. Given an average household in Hokitika at 2.5 persons, a residential subdivision of 25 dwellings would have a total of 62 people. While the noise generated by the type of activities on the site is of a similar type than for a residential activity, the total number of people on the site is likely to be greater. Added to that, the nature of the activity means that the people on the site are more likely to be outdoors, rather than in a building.
- 50 Later in my evidence I will discuss the measures that will be put in place to address the noise effects.

## **EFFECTS ASSESSMENT**

- 51 Although I have stated above that I consider most of the potential effects to be similar to the permitted baseline activity, I have completed a full effects assessment as follows. In my opinion, the potential effects of the proposal are as follows:

### Visual effects

- 52 The visual effects of the proposal relate to the proposed buildings on the site, and the landscaping on the site. There are also visual effects from the occupants of the site: campervans, tents and caravans; which will be forever changing due to the nature of the use of the site.
- 53 The proposed buildings are all of a similar scale, size and design as residential – there are no large or bulky buildings in the proposal. The largest building is 285m<sup>2</sup>, and the tallest building has a maximum height of 5.5m. The total ground floor area of all of the buildings on the site is 1375m<sup>2</sup>. I consider that the visual effects of these buildings will be less than would result from residential buildings on the site.
- 54 The proposed landscape plan incorporates native planting, linking the campground to the bush on the terrace, and ornamental species as would be observed in a residential garden. As described in Mr Craig's evidence, the landscaping will be the dominant feature of the site, along with abundant open space.

### Traffic effects

- 55 At maximum capacity the total traffic movements per day would be approximately 272. This is made up of 8 traffic movements for the dwelling,

and an average of 4 traffic movements per unit, cabin or site. It is likely that the campground will be at maximum capacity at Wildfoods weekend (in March), and possibly on some days in January.

- 56 Figures from Statistics New Zealand for holiday parks on the West Coast show an average occupancy in January/ February 2016 of 43.5%, and an annual average occupancy of 22%. However former managers of the former Hokitika Holiday Park have advised us that their average occupancy in January/February was around 75%, and their average annual occupancy was around 40%. Even using these higher figures, the likely traffic movements in January/February would be an average of 206 per day, and the average over the year is likely to be 114 per day. Traffic movements are likely to be highest during the January/February period, and during weekends and school holidays.
- 57 A residential development of 25 dwellings would be assessed as generating 200 vehicle movements per day. While the traffic movements associated with the campground will have a greater seasonal variation than residential traffic, I consider the traffic movements generated by the campground to be within the permitted baseline.

#### Noise effects

- 58 The sources of noise associated with the campground are noise from vehicles within the subject site, and noise from people staying in the campground. These are also common sources of noise in a residential area, together with dogs barking. The sources of noise will vary throughout the year, with more people and vehicles during the busy summer season, and less through the winter.
- 59 The noise from vehicles within the site will be minimised by the imposition of a speed limit through the campground of 15km/hr. This will be included in the camp management plan. Generally the busy times for vehicle movements on site are expected to be 7-10am and 3.30-7.30pm. Vehicle movements will be minimised after 9pm when the office closes, so there will be no new arrivals checking in after 9pm.
- 60 The noise from people using the campground is the most unpredictable source of noise. Generally the noise will be of a type expected in a residential area ie children playing, people talking and music playing. The areas where people tend to congregate have been placed close to the centre of the site, ie the children's playground, the games and TV rooms, and the outdoor barbecue area. There will be a manager on-site 24 hours a day. Camp rules will explain that there is to be no excessive noise after 8pm, and if there is any excessive noise the manager will shut it down.

- 61 The proposed landscaping for the site will create a buffer for noise, by ensuring that people are not congregating at or close to property boundaries. In particular buffering has been provided at the boundaries to the properties identified in the S42A report.
- 62 Measures will be put in place in a camp management plan, to manage the noise on the site. These measures will include closing times for the playground and communal areas, restrictions on excessive noise after 8pm and restrictions on music after 10pm. The management plan will also cover where these rules will be displayed (website, office, signs in communal areas etc) and the consequences if rules are broken.
- 63 The proposed camp management plan will address the management of noise on the site, to ensure that it not only complies with the District Plan noise requirements, but is also at a reasonable level for a residential area.

#### Lighting/glare

- 64 The lighting will be appropriate for the residential area. The concept design calculations, prepared by Anton Kleyburg of Micon Engineering (1995) Ltd, show that all lighting established within the site shall be positioned and orientated such that the maximum lux spill to any adjoining residential property will be 5 lux. This is significantly less than the permitted activity standard in the District Plan. As stated by Mr Kleyburg "the spill light levels on the boundary is less than commonly found on road front properties where road lighting is present.

#### Privacy

- 65 The proposed campsite, as with any development from a vacant site, will have some effects on the privacy of neighbours. The campsite has been designed with all of the communal facilities, and the areas that people congregate, in the centre of the site, to maximise the distance from adjoining properties. A 1.8m high fence has been built around the site, for most parts this fence is approximately 0.5m inside the boundary, and is additional to the previously existing boundary fence. As outlined in Mr Craigs evidence, the landscaping will assist in providing privacy to both users of the campground and adjoining residents.
- 66 Mr Craig concludes that "The issue of privacy and outlook, particularly from elevated dwellings and living areas will be satisfactorily addressed by the proposed landscaping."

#### Residential character and Amenity

67 The effects on Residential character and Amenity are covered in depth in the evidence of Mr Craig, and I agree with his assessment. With the addition of the landscaping design, I consider that the proposal will fit with its residential surrounds, and be a pleasant addition to the residential mixed zone neighbourhood.

#### **POSITIVE EFFECTS**

68 The proposal will have significant positive economic effects including:

(a) Employment during construction – the proposal will provide employment for 18-20 people for a period of 4-5 months during construction. Construction will be carried out by local firm Evan Jones Construction. There will also be some employment for sub-contractors during construction, such as electricians, plumbers, drainlayers and painters.

(b) On-going employment for a Camp Manager (most likely a couple), as well as office and shop staff, cleaning staff and maybe a grounds-person. Based on the advice we have received from other camp ground managers and former managers, it is likely that the total staffing requirement will be 1-2 permanent full-time staff, and up to 8 part-time and seasonal staff.

(c) Providing for tourists – With the closure of the Hokitika Holiday Park in November 2015, there is no campground facility of this type in Hokitika. The proposed campground development is considered to have a positive effect for the whole town, if there is nowhere to stay in town the tourists will carry on to the next town, and spend their money there. Figures from MBIE show that for every \$10 spent on accommodation, tourism expenditure on food and beverage services is \$6.70, passenger transport \$14, retail sales \$7.45, fuel and automotive \$8.95 and other tourism products \$3.80. Therefore having tourists stay in town provides economic benefits for other businesses in the town.

69 While a holiday park is not a tourist attraction as such, and may not actually attract tourists to the town, a lack of accommodation within the town is a significant deterrent to tourists. Figures from the Commercial Accommodation Monitor show an increase of 6% in guest nights on the West Coast for the year ended October 2016, and an increase of 13.7% in guest nights in holiday parks. The figures also show a drop in capacity of Holiday parks in the same period of 0.9%. The closure of the former Hokitika Holiday Park is part of that drop in capacity.

70 Figures from the Commercial Accommodation Monitor for the West Coast also show that Holiday Parks have an average length of stay of 1.51 nights, the

highest of any accommodation type. Getting tourists to stay longer is a major focus of current campaigns by Tourism West Coast.

- 71 A new holiday park, called Hokitika Holiday Park has recently opened approximately 4.5km north of Hokitika. The former Hokitika Holiday Park provided accommodation in 12 motels, 6 kitchen cabins, 6 cabins, 40 powered sites, and 100+ non-powered sites. The total capacity of the campground in this proposal, and the new Hokitika Holiday Park will be less than the total capacity of the former Hokitika Holiday Park. Former managers of the former Hokitika Holiday Park have advised us that the occupancy in January was generally around 70 – 80%. This would indicate that the likely demand will be greater than both campgrounds combined.
- 72 Another factor creating demand for accommodation is the West Coast Wilderness Trail. An overnight stopping point for this cycle trail is Hokitika. Figures from the trust indicate that the total number of cyclists using the trail is 8000-10,000 per year. However no breakdown is available for the number of tourists vs the number of locals. The proposed campground is in a suitable location, and provides a range of accommodation options, to cater to this market.
- 73 Davie Street will be upgraded as a result of the proposal. This will include a footpath, which will provide safer pedestrian access for the residents as well as for the users of the campground.

#### **PRINCIPAL AREAS OF CONTENTION**

- 74 There are five main areas of concern identified through expert conferencing and further discussed in the Officer's Report. I will discuss these in turn and provide my expert opinion on these potential effects and the proposed mitigation by the Applicant.

#### Permitted baseline

- 75 Ms Hollis did not agree with the permitted baseline assessment in the application. I have taken account of Ms Hollis's comments, and I have reassessed the permitted baseline as being 20-30 dwellings. I do not agree with Ms Hollis's assessment of 10 dwellings as a permitted baseline, as I consider that would not be a sustainable use of such a large site. While it may be unusual to have so many dwellings on one title, I do not consider it to be fanciful.
- 76 While we are not in agreement with the number of dwellings to be considered within the permitted baseline, we are generally in agreement with the effects that fall within the permitted baseline.

### Noise:

- 77 Ms Hollis raised concerns about the likely noise effects of the proposal. These concerns have been taken into account in the proposal, with the addition of a proposed condition of consent requiring the preparation of a Camp Management Plan.

### Privacy

- 78 I consider that the proposed landscape plan addresses the concerns raised by Ms Hollis, in particular with the provision of buffers and formalised planting areas. Mr Craig concludes "The issue of privacy and outlook, particularly from elevated dwellings and living areas will be satisfactorily addressed by the proposed landscaping".

### Visual Character and Amenity:

- 79 Ms Hollis raised concerns about the effects on visual character and amenity, particularly in relation to some properties.
- 80 I consider that the proposed landscape plan addresses the concerns raised by Ms Hollis. Mr Craig concludes that "Including the proposed landscaping, it is also my opinion that there will be no adverse effects on amenity, or at least none beyond what can be reasonably expected to occur in a mixed residential setting such as this. Certainly from the point of view of neighbours their view is going to be dominated by vegetation and abundant open space – both key contributors to amenity in any environment.

### Signage

- 81 Having taken into account the comments in the S42A report, the applicant has dropped the proposed off-site sign from the application, and will apply for a standard motorist service sign.
- 82 The proposed on-site sign is to be located at the campground entry at the end of Davie Street. This sign will have a total area of 3m<sup>2</sup>. The purpose of the sign will be to make it clear where the entry to the camp ground is, and direct people towards the office parking area. The sign will have up-lighting from the ground.
- 83 The District Plan lists the assessment criteria for on-site signs in Appendix E. The impact on Visual Amenity has been covered by Mr Craig in his evidence. The other criteria are:



- *Impact on Traffic Efficiency and Safety. When assessing an application, the Council will specifically consider actual or potential effects on the site and its environs in terms of traffic safety, including but not limited to:-*

- *The legal and operating speed of the road*
- *Whether the sign will:*

- *obstruct the motorist's view or dangerously distract their attention from the driving task*

- *obscure or obstruct visibility to other signs, including signs erected by the road controlling authority for road safety or driver information purposes.*

- *The siting of the sign in relation to intersections*
- *The visibility of the sign and the legibility of its content, including consideration of the lettering size and height, numbers of words and symbols and readability of the font used*
- *Whether light spill and glare will be directed away from the road*
- *The potential distraction to road users from the driving task through the use of illumination and flashing, rotating or moving signs or displays*
- *Provision of any mitigating safety benefits through further or better identifying the activity on the site to which the sign relates and clearly identifying its access points. Signs may be illuminated but may not be flashing, revolving or retro-reflective.*

*Signs shall have neat and uncluttered lettering.*

*Signs shall be sited so that they do not restrict visibility to and from intersections and property accesses.*

*Signs shall not conflict with the colour combinations or shape of traffic control signs.*

*Signs and support structures shall be well maintained.*

The sign proposed is intended for the purposes of traffic efficiency and safety, by making it clear where the entrance to the camp ground is, and where to go upon entering, so that traffic is not stopping in Davie St and potentially blocking other driveways. The sign will does not obstruct the motorists view, or restrict visibility of any intersections or property accesses. The sign has been specifically designed for being easily read from the intersection of Park and

Davie Street, and has neat and uncluttered lettering. A condition of consent will ensure that the sign is adequately maintained.

Given that Mr Craig concludes that the visual effects of the proposed sign are mitigated by its relatively low height above ground level, and that it will blend in to the background, I consider that the sign is appropriate for its setting and purpose.

- 84 The Applicant has considered both comments from Ms Hollis and submitter comments and responded to these concerns through additional mitigation measures. In my opinion the design of the proposed campground appreciates the sensitivities of the neighbouring residents and additional design elements, namely proposed landscaping and campground management plan, address these concerns.

## **OBJECTIVES AND POLICIES**

- 85 The District Plan Objectives and Policies which I consider to be relevant are set out and discussed below.

### Sustainable Communities – Objective 3.2.1

3.2.1 To establish levels of environmental quality for Westland which enable people and communities to provide for their social, economic and cultural well being, while meeting the principles of sustainable management of natural and physical resources.

In the explanation on sustainable communities the District Plan states: “The Council has given priority to the issue of community viability”. Tourism is essential to the viability of many businesses in Hokitika, and the provision of a range of accommodation options is an important part of this. With the closing of the Hokitika Holiday Park, there is not a camping ground option available within Hokitika. This proposal will provide an important accommodation option to allow more tourists to stay in Hokitika, and therefore to spend money on meals, fuel and activities.

- 86 Infrastructure and Services – Objective 3.4.1, Policy 4.6A

3.4.1 To ensure that all servicing activities are carried out in a manner, and in locations, which avoid, remedy or mitigate adverse environmental effects

Servicing will be carried out in a manner that avoids adverse environmental effects. The proposed stormwater management plan for the site reduces the amount of water that is discharged into the Hokitika Stormwater system, therefore, having a positive environmental effect.

87 The Built Resource – Objective 3.9.1

This objective is covered in the evidence of Mr Craig, he concludes that the proposal is not contrary to this objective.

88 The Built Resource – Objective 3.9.2, Policy 4.2A Settlement Character

3.9.2 To provide for the “intermingling” of land use activities within Westland’s settlements and towns, where this does not detrimentally impact on the amenities, health and safety of residents and workers.

4.2A. A range of activities should be able to locate in the urban areas provided that any adverse effects on the environment or neighbouring land uses are avoided, remedied or mitigated.

Anticipated Environmental Outcome IV in 4.2 is: Intermingling of compatible activities within residential areas and increased opportunities and flexibility for activities locating in urban areas.

The introduction to 3.9 The Built Resource states: The built environment is generally to be managed in such a way that character is enhanced and tourist opportunities are maximised. Hokitika should become a tourist and visitor destination in its own right, rather than a convenient stopping place for attractions further north or south.

Having a camp ground in Hokitika is essential to meeting these aims. Figures from Tourism West Coast show that on average people that stay at Holiday Parks stay longer than any other accommodation type.

A camping ground is a landuse that is compatible with the residential area, with no detrimental effects on the amenity, health and safety of adjoining residents. The Hokitika Holiday Park, prior to closing recently, was also located in the residential mixed zone.

89 Part 4.4 Amenity:

These policies are covered in the evidence of Mr Craig. He concludes that the proposal is not contrary to these policies.

90 In my opinion the proposal is not contrary to the objectives and policies of the District Plan.

91 In the S42A report Ms Hollis also concludes that the proposal should not be considered contrary to the relevant objectives and policies of the Plan.

**Part 2 RMA**

- 92 The application calls for a broad overall judgment as to the appropriateness of the proposal once all relevant considerations under section 104 have been had regard to. These are all subject to Part 2. Part 2 provides the overriding purpose and principles of the RMA that should be kept firmly in mind when making any resource management decisions, including determination of resource consent applications.
- 93 These provisions and the purpose of sustainable management will be well known to the Commissioner. I consider the proposal is an efficient use of the site and will provide for the wellbeing of the Applicant and travellers to Hokitika. Providing an accommodation option to visitors to Hokitika also helps support the tourism industry, which in turn provides for the wellbeing of the community and residents of the town itself.
- 94 I do not consider there are any relevant section 6 (Matters of National Importance) or section 8 (Treaty of Waitangi) matters for this proposal.
- 95 In terms of section 7, the site is zoned for mixed residential purposes, and the utilisation of the site for traveller accommodation is consistent with the “intermingling of land use activities” provided for in the Plan, whilst achieving the desired amenity of the environment also provided in the Plan. The quality of the existing environment will be maintained through the comprehensive design, including the use of single story architecturally designed buildings, generous internal and road boundary setbacks, and suitable depth and height of landscaping, to result in a quality urban form and provide a high level of on-site amenity for both travellers and neighbouring residents.
- 96 In my opinion the proposal is consistent with the relevant objectives and policies of the Plan which have the statutory function of achieving the purpose of the Act. Any adverse effects will be no more than minor, which resonates with the principle of enabling people and communities to provide for their wellbeing, particularly when considered alongside the positive effects of the proposal. These positive effects have been discussed earlier in my evidence at paragraphs xxx and in my opinion they are significant.
- 97 Taking a broad overall view of the relevant matters for consideration, I consider the proposal achieves the sustainable management purpose and principles of the Act.

## **RESPONSE TO SUBMISSIONS**

- 98 The proposal was limited notified in accordance with Section 95B of the RMA to 25 affected parties. There was one submission in opposition, signed by 25 parties and one submission in support.

99 The submission in opposition has been summarised by Ms Hollis in her S42A Report and I agree with this as an accurate record of the various issues raised. The submission covered a number of issues, and I consider that most have been covered in my evidence, and through the expert evidence of Mr Weal and Mr Craig.

100 The submission in support, which is not identified by Ms Hollis in her S42A Report, was from Terrence John Bedford, the owner of 182 Rolleston Street.

#### **CONDITIONS**

101 Included in our application were a set of proposed conditions. These have been amended in response to design changes, submitter concerns and expert conferencing. In particular, the Applicant proposes adding conditions relating to management plans and landscaping. A copy of these conditions is attached to my evidence at **Appendix C**

#### **CONCLUSION**

102 I consider that the proposal does not generate any adverse effects that are more than minor.

103 I also consider that the proposal is consistent with the Objectives and Policies of the Plan, and Part 2 of the RMA.

104 I ask that the commissioner grant consent, subject to the conditions as attached.

Name Lynda Watson

Title Licensed Cadastral Surveyor

Dated this 10th day of February 2016