

Supporting Document for Submission in Regard to Rezoning of Partial Site at 235 Signal Hill Road [SITE 52]

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This document is intended to illustrate and give further details on my submission in regards to the proposed rezoning of a section of 235 Signal Hill Road (Site 52) as part of the Dunedin City Council 2GP Variation 2 process.

1. PROPOSED PLAN CHANGE:

The plan change illustrates a section of 235 Signal Hill Road (referred to as Site 52) which is proposed to be rezoned to residential from the existing rural classification. The proposed change as it stands is shown below as found in the DCC documentation for Variation 2.

Map 4: 235 Signal Hill Road

(the part of the site outside the significant natural landscape overlay only)



2. THE PROBLEMS:

There are, in my opinion, some problematic aspects of this rezoning proposal. These primarily relate to a large chunk of this proposed area sitting on varying degrees of established or regenerating native bush, which holds high biodiversity value, both now and increasingly so into the future.

2.1 Preservation of Urban Biodiversity and Wildlife Corridors

It is apparent that the shape of the proposed rezoning has been largely determined by the 'Significant Natural Landscape' [SNL] overlay, and has, due to this, compromised the other values of the site which are in regards to biodiversity.

As I understand it, the 'Significant Natural Landscape' overlay is in place to preserve to some extent, the 'rural feel' and natural views of Dunedin's peri-urban area. I believe that this is a valuable and worthwhile thing to protect and consider when making planning decisions and considering rezoning applications.

But, it seems at odds with other planning values if this SNL overlay is to be preserved all costs even if that means destruction of established native trees which are host to birdlife and other species.

I believe that in this case, the priority should be placed more strongly on preservation of urban biodiversity, and the retention of existing native bush / wildlife corridors (which will continue to improve and regenerate into the future as well) rather than very strictly adhering to the elevation line drawn (somewhat arbitrarily) by the SNL overlay zoning.

The property does contain some existing areas which are defined (or drafted for) 'Area of Significant Biodiversity Value' [ASBV] status. These areas are shown below in a map found in the DCC Variation 2 documentation:

Image 5 – Map of vegetation types (yellow boundaries) on 235 Signal Hill Road from ecological assessment report showing important dry forest areas meeting ASBV criteria marked with red boundaries (note the map has been cropped from the original).



Of particular note of the border of this ASBV zone is in area 6, which is the 'spur' part at the central left of this above image. The tip of this 'spur' ends where the bush narrows, but in fact there is a continuation of a ribbon of similar established and regenerating native bush (predominantly Kanuka), mixed with some exotic plants, which extends along the remainder of this North Western boundary line. This bush is habitat for many native birds and other indigenous animals like lizards and insects.

In the DCC report of the assessment of the biodiversity values of this site, the writer of the report has referred to this strip as of 'lesser value' than some other parts of the section, but, seemingly only in relation to the species of plants and trees present, rather than the complete biodiversity and wildlife value of the strip of native bush as a whole.

As a resident of the local area, and a keen observer of nature, I can attest to the fact that this strip of bush is home to an impressive diversity of native birds which presumably also nest and breed there, including but not limited to **tui**, **kereru** (wood pigeon), **korimako** (bell bird), **riorio** (grey warbler), **ruru** (morepork), **piwakawaka** (fantail), **tauhou** (silvereye) and **pīpīwharauoa** (shining cuckoo). Additionally, various species of lizard and abundance of native insects inhabit this area.

2.2 Misalignment with DCC Policy

The Dunedin City Council has publicly stated its desire to engage in intelligent, forward thinking and sustainable development of the city and to manage its growth in accordance with these overarching ideals. One of the key tenets of these policy directives is the attention that must be paid to the retention of urban and peri-urban biodiversity.

While it is clear that Dunedin as a city needs additional housing capacity, which will be achieved by a variety of means including some 'green field' development, I find it hard to believe that we have reached the point of desperation that clearing native bush to build houses is now considered an acceptable course of action, either in terms of formal policy or in terms of wider public approval.

In addition to these values, which are to be held in balance by the DCC in regards to planning decisions, there are also legislative documents increasingly coming in to play including the **Draft National Policy Statement for Indigenous Biodiversity** (coming into effect shortly) which sets minimum targets for indigenous vegetation cover in urban areas.

Further to this, it has been well documented in planning literature that retention of 'ribbons' or pockets of indigenous vegetation through urban areas not only supports biodiversity values but also confers other benefits such as: moderating temperature extremes via shade and 'air trapping', moderating humidity extremes by slowly releasing humidity from soil and foliage, moderating soil moisture (and flood / drought risk) by absorbing heavy rainfalls and then storing that moisture for slow release over time, moderating wind speeds by providing wind shelter, improving air quality, and obviously increasing amenity values in general. These aspects all relate back to the DCC's often stated intentions to consider climate change in its planning for the future. Retention of native bush will increase our localised climate resiliency.

2.3 Neighbourhood Character

The neighbourhood adjacent to the proposed Site 52 is in large part characterised by its proximity to this bush area in the peri-urban part of North East Valley. Many of us who live in this area were drawn here by this very aspect of the area. Most residents of the street immensely value the natural features of the area in which we live and many people live, and maintain their properties with a view to supporting and enhancing biodiversity and sustainability in general by planting of native trees and growing of edible crops and fruit trees (which the birds often get a good feed out of as well). The proposed development of Site 52 would likely have significant impact on these qualities of the neighbourhood that are highly valued by its inhabitants and visitors to the area.

2.4 Difficult Terrain, Site Access and Infrastructure

The area towards the southern end of proposed Site 52 is not only covered in established and regenerating native bush, it is also exceedingly steep. The area is well known among locals to have significant issues with hydrology, drainage and land stability. The long, thin strip of development proposed by Site 52 would potentially involve a high cost to benefit ratio in terms of the creation of additional infrastructure, to service just one strip of houses. In addition to this, the earth works and paving required even to create adequate site access would inevitably result in the destruction of a significant amount of native bush and biodiverse areas. Wastewater provision is also challenging.

3. SOLUTIONS

It is not my intention by making this submission to be 'anti development'. But I do wish to see Dunedin growing in an intelligent and forward thinking manner which will properly balance the need for growth, with the long-term need to maintain and foster urban and peri-urban biodiversity. It is also important to maintain the features of Dunedin which many residents and visitors cherish, including having a city which is intertwined and intermixed with the natural world in a way which can showcase what a well planned city can look and feel like.

In relation to this specific proposal (Site 52) I have some suggestions which I think take into account the above outlined considerations and which allow for growth in Dunedin whilst retaining important sections of native bush which will pay dividends in terms of natural values, neighbourhood character, amenity value, and broad scope sustainability for many decades into the future.

3.1 Adjustments to proposed Site 52

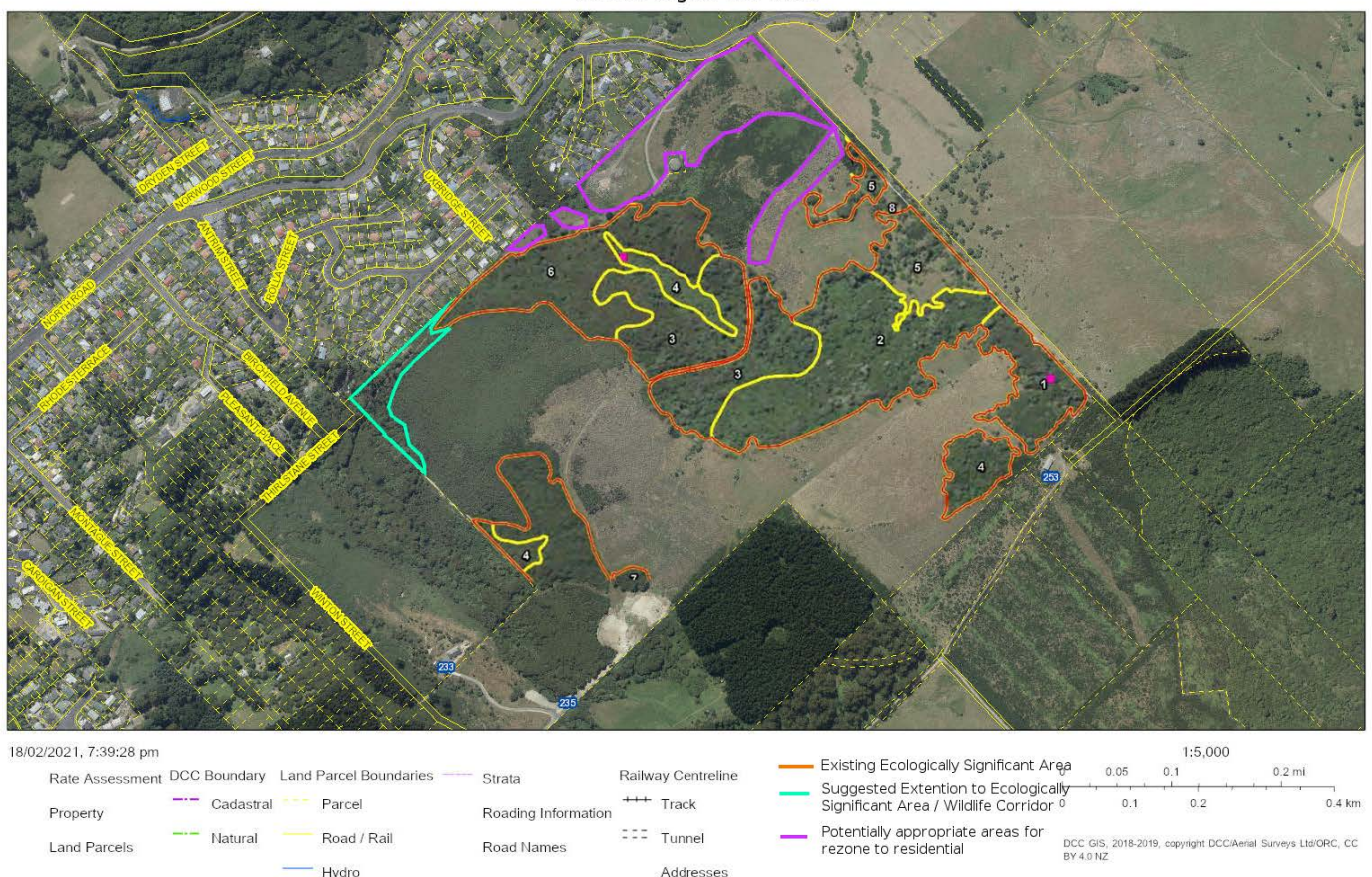
As previously mentioned, it seems as though the primary influence shaping the layout of Site 52 is the Significant Natural Landscape [SNL] overlay (Rural Hill Slopes) which has forced the proposed area to remain under a certain elevation line on the hill contour. As a result of this the site now encroaches upon Areas of Significant Biodiversity Value [ASBV].

It is my proposition that a balance can be found between honoring the intention of the SNL overlay as well as protecting and extending the ASBV.

In essence it is suggested that a small allowance is allowed on the upper limits of the SNL on the northern corner of the property (north and east of the water tank) in order to retain the areas of native and regenerating bush along the north western boundary.

This suggestion is illustrated in the image below which has been modified based on DCC documentation.

Proposed Adjustments to Site 52 Rezoning
At 235 Signal Hill Road



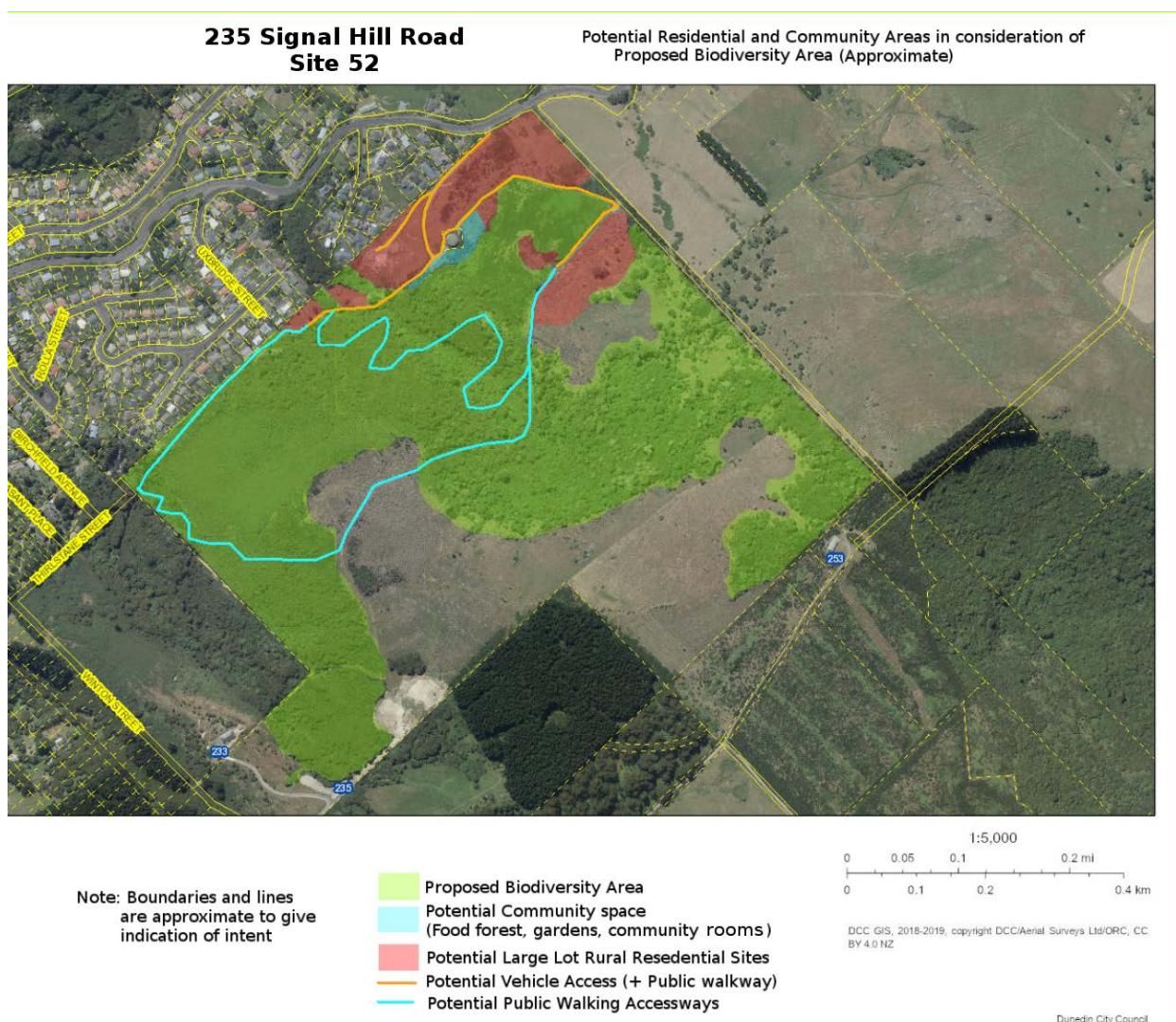
In this image, the existing ASBV is shown in orange lines. A proposed extension to this ASBV to allow wildlife corridor and protect established trees is shown in light blue. Potential areas for residential rezoning, which at the upper extent do go beyond the current proposed area but which do not involve the clearing of native bush, are shown in purple.

3.2 Potential Community and Amenity Values Enhancement

Given the nature of the site, there is significant scope to incorporate increased amenity value for the wider community into development of this site, in addition to protection of biodiversity.

In the summary of biodiversity values described in Appendix 8 of the Variation 2 Documents (Memorandum from Biodiversity Advisor), the advisor has commented that of the rare type of 'dry forest' covering large sections of the site is "*potentially the best local example remaining*" (of this type of bush). Many of the other sections of bush on the property (outside of the 'dry forest' zones) are still great quality bush which present potential for the establishment of a **public walking trail** to enjoy this unique area. This would provide amenity, exercise opportunities and connection with nature to residents of the area and beyond, and would be an asset to the city at large as an addition to its well loved network of walking trails.

In addition to walking trails, there is potential for some sections of land to be designated as **community space**. For example in the form of an open space that could be used as a mixed social / picnic / relaxation area as well as for community food growing via the planting of fruit trees and / or some public allotment vegetable growing areas. Some members of the community have also expressed desire for a community room or teaching space where community activities can be held of all kinds in a space which is permanent and secure.



Some potential ideas are shown here in regards to walking trail and community space (conceptual only). The area near the water tank could be suitable for this as people may not want to build houses too close to the large tank.

By adding amenity value such as walking trails and community space to a development such as this, the overall social value and 'liveability' of the neighbourhood is increased, which brings benefit to all residents. This is a great opportunity for the proposed development to employ 'industry best practice' in terms of intelligent, inclusive and forward thinking development.

An extension of the bus service to another stop closer to here is another idea that some residents of the neighbourhood have expressed interest in if the proposed development were to go ahead.

3.3 Pros and Cons of Proposed Changes

I feel that the proposed modifications to Site 52 outlined above would have largely positive outcomes by comparison to the existing proposal.

Some of the potential **benefits** include:

1. Native bush, and urban / peri-urban biodiversity values are protected for generations to come.
2. An equal, or potentially slightly greater, amount of land is made available for development and housing.
3. Amenity and community values of the area are supported and enhanced which is good for all, and the city as a whole.
4. More efficient usage of infrastructure. Less roading / piping / cables / drainage etc needed for houses more concentrated in one area.

The main potential **negative impact** is:

1. A slight encroachment into the 'Rural Hill Slopes' SNL overlay, but, in a portion of the slope which is not highly visible from many places in the area.

4. CONCLUSION

In this document I have outlined the proposed development, Site 52 at 235 Signal Hill Road, and explained the reasons why I think that some aspects of this may be problematic. The primary reasons for this is concern for the biodiversity values brought by established and regenerating native bush which is in jeopardy if development was to go ahead in some parts of the Site.

I have suggested that, in light of DCC policy as well as national level policy documents, and current 'best practice' planning strategies, that some adjustments are made to the proposal in order to balance the need for development, with the preservation of valuable biodiversity and peri-urban landscapes in Dunedin.

It has been suggested that a slight compromise could be considered in regard to extending development into some small, lower portions of the SNL overlay which are not host to native biodiversity, in order to protect the existing biodiversity areas and maintain wildlife corridors. The addition of some community elements to the project such as community open space and public walking areas is also suggested to be incorporated.

I believe that the small negative impacts of this proposed 'reshuffling' would be far outweighed in the long term by the various benefits that this would bring to the community and the city at large, far into the future.

There is also potential for the further enhancement of the Areas of Significant Biodiversity Value through collaboration with the community, and groups such as *Open Valley Urban Ecosanctuary* and the *Halo Project* to engage in activities such as native tree planting, removal of invasive species, and trapping, to create an asset that will be appreciated by many for generations.