

19 September 2016

Mainland Property (2004) Limited
C/- Cubitt Consulting Limited
11 Bedford Street
Dunedin 9012

Dear Allan

RESOURCE CONSENT APPLICATIONS:

SUBDIVISION SUB-2016-28
LAND USE LUC-2016-169
82 RICCARTON ROAD EAST
MOSGIEL

The above application for a two lot subdivision was processed on a notified basis in accordance with Section 95 of the Resource Management Act 1991. The Consent Hearings Committee, comprising Councillors Andrew Noone (Chairperson), Lee Vandervis, Andrew Whiley, and Bill Feather (Mosgiel Taieri Community Board), heard and considered the application at a hearing on 23 August 2016.

At the end of the public part of the hearing, the Committee, in accordance with Section 48(1) of the Local Government Official Information and Meetings Act 1987, resolved to exclude the public. Following the conclusion of the hearing, a site visit was undertaken by the Hearings Committee.

The Committee has **granted** consent to the application on 5 September 2016. The full text of this decision commences below with a consent certificate attached to this letter.

The Hearing and Appearances

The applicant was represented by:

- Allan Cubitt (Planner)
- Chris Kelliher (Applicant)
- Derrick Railton (Engineer)
- Dr John Lindqvist (Geological Consultant)
- Mike Moore (Landscape Architect)

Council staff attending were:

- Kirstyn Lindsay (Advisor to Committee),
- Lianne Darby (Processing Planner)
- Wendy Collard (Governance Support Officer)
- Barry Knox (Landscape Architect)
- Lee Paterson (Council's Consultant Geotechnical Engineer)
- Chelsea McGaw (Water and Waste Consents and Compliance Officer)

Submitters in attendance included:

- Warren Hanley and Dr Ben Mackey (Otago Regional Council)
- Margaret Scott (Resident of 103 Main South Road)

Procedural Issues

A late submission was received from Deborah Mason of 81 Main South Road on 26 July 2016. The Committee determined that as the submission was received some five weeks after the close of the submission period, it was not able to be accepted.

Principal Issues of Contention

The principal issues of contention are as follows:

- Whether the proposed subdivision passed the 104D test and the committee was able to consider granting consent.
- Whether the granting of consent for this non-complying activity created an undesirable precedent.
- Whether the land stability issues identified for the site precluded additional residential development.
- Whether appropriate stormwater and wastewater management systems could be designed for the site.
- Whether the effects on landscape values were more than minor.

Summary of Evidence

Introduction from Processing Planner

Mrs Darby outlined the application as it was received and gave a brief summary of the subject site and surrounding area. She noted the zoning of the subject site as rural and identified the land instability hazard annotated on the Council's hazard register. Mrs Darby identified the status of application as a non-complying activity under the operative plan. The application was notified on 18 May 2016, and four submissions were received plus one late submission which was not accepted. Two submissions oppose the application, one is in support, and the other is neutral in its stance. The supporting submitters believe that the residential use of the land will be beneficial for the area. The opposing submitters have concerns about land stability and runoff from the house sites, and the integrity of both district plans.

Mrs Darby noted under the proposed District Plan, it was proposed that the zoning of the site be changed to Rural-Coastal and identified as a Hazard 2 – Land Instability. The minimum lot size rule for the Rural zones identified in the proposed District Plan has legal effect and a minimum lot size of 40.0ha for the Rural-Coastal zone has been set. The subdivision is also considered to be a non-complying activity under the Proposed Plan.

Mrs Darby acknowledged that the application had been amended after the release of her S42A report but she had not reviewed her assessment in light of these changes. In making her assessment of the environmental effects of the proposal, she considered the nature of the application, the local environment, Council Officers' comments, and the comments of submitters. It was Mrs Darby's view that the proposed subdivision and residential development would have adverse effects on rural and landscape amenity which would be more than minor. She considered that the proposal is consistent with many of the objectives and policies of both Plans, but inconsistent with those regarding amenity, rural productive worth, landscape and subdivision of rural land. Importantly, she considered it contrary to those objectives and policies regarding amenity of the Rural zone. Furthermore, she believed that the granting of consent risked the setting of an undesirable precedent which could extend well beyond the boundaries of the subject site as there were comparable properties in the surrounding area and wider afield. For these reasons, it was her recommendation to decline consent. However, she noted that with the reduction from three lots to two lots, it was likely that the proposal could now pass the gateway tests set out in s104D of the Resource Management Act 1991 (the Act) and that ultimately the Committee must form its own view on its own assessment of the proposal, and may decide that granting consent is a more appropriate decision.

The Applicant's Case Summary

Mr Cubitt opened the applicant's case by offering up the proposed changes to the subdivision which resulted in a reduction from three lots to two lots. He noted that the changes were made in a direct response to Mrs Darby's recommending report and the comments made by Council officers and the submitters. He noted that as the revised proposal was a reduction in the scale of the proposal and, with the surrender of the existing building platform along the ridgeline, it was anticipated that the effects would be reduced and there was no need to re-notify the application.

Mr Kelliher, director of Mainland Property (2004) Limited, noted that it was a difficult site as it wasn't really big enough to be a productive unit. He had looked at a range of uses for the site including farming activities. He believed it would be inappropriate to finish steers or bobby calves on the site due to the close proximity of residential neighbours but did allow the grazing of sheep but this was more as grass and weed control than for any return. If consent was not granted, he would need to reconsider the potential of the site.

Mr Railton spoke to his pre-circulated evidence and discussed the stormwater and wastewater management options for the site. With regard to stormwater he noted that there was a requirement that flows from the site were not increased or concentrated as a result of the development. He noted that this was achievable through rainwater collection from hard surfaces and a retention or detention system. Either system would be viable at this location but that the specific system design would need to be undertaken in conjunction with the house design. He believed that it would be appropriate for a stormwater management plan to be required as a condition of consent. When questioned by the Committee he did not consider that it would be practical to reduce the amount of stormwater coming off the site given that it mainly comprised natural run-off but that water coming off the new dwelling could certainly be managed. He noted that stormwater from the structures on Lot 1 were discharging to the south so only the discharge from any structures on Lot 2 would be managed towards Main South Road.

Mr Railton also believed that there were two options for wastewater treatment and dispersal for Lot 2; a primary septic tank system to mounded beds or a secondary treatment system dispersed through pressure compensating drip lines. The cost for each system was about the same but he considered the dripline system to be more versatile. Each system had a very low application rate and, in his opinion, would not affect land instability. He noted that Lot 1 was already serviced by a drip line system and exhibited no effect on land instability. The committee questioned Mr Railton about geology of the site and whether the schist underlying the site would impact on the system. Mr Railton noted that while at least 150mm of topsoil was required he noted that in some cases he had supplement the topsoil cover over the dispersal field. In this instance, he did not think that this would be an issue as the area required for the dispersal field was small compared to the site area and he was certain that a suitable location could be identified. When question about planting, he noted that grass over the dripline dispersal field is required but generally other planting was not required. In the case of primary treatment, he noted that the mounds could be planted out.

Mr Lindqvist spoke to his pre-circulated evidence and detailed the geology of the site. He noted the slump identified by the Otago Regional Council (ORC) in its submission and sought agreement on the exact location of the slump area. It was his opinion that that this was a shallow element would be unlikely to develop into a significant feature. He suggested that this area could be planted out and that this would contribute to the stability of the slump. Mr Lindqvist noted that the feature was contained entirely within proposed Lot 2 and, as such, this meant that management of the area was less complicated than if it straddled the boundary. While he had not observed any sign of failure associated with the slump area and did not consider that the feature was likely to fail, he considered that requiring any building platform to be set back from the slump feature would provide some peace of mind to the Committee should they be of a mind to grant consent. He agreed to provide the Committee, in consultation with Mr Cubitt, with a more detailed plan showing the feature and set back proposed for the building platform on proposed Lot 2.

Mr Moore spoke to his pre-circulated evidence and noted the landscape values of the area. He noted the proposed positive effect of surrendering the existing building platform on the ridgeline in favour of the building platforms on proposed Lots 1 and 2. He noted that there were a number of conditions proposed which would help to alleviate the effects of the built form on the landscape, including the platform on proposed Lot 1 being cut into the hillside, requiring a colour palette for the structures, height restrictions and planting. Taking into consideration the proposed conditions of consent, Mr Moore was confident that the proposal would fit comfortably into the environment. He believed that the values of the Saddle hill Landscape Conservation Area (SHLCA) could not be considered as the subject site sat well outside of the SHLCA and that there was no mandate to apply a buffer zone. Overall, he considered the landscape effects to be less than minor when considering what could be undertaken on the site as of right.

Mr Cubitt returned to his pre-circulated evidence noting the proposed district plan zoning of the area had been challenged but that this was not relevant to this application. He maintained his opinion that the area was one where the character was in transition from rural to rural residential. He considered that the rural amenity that the District Plan sought to protect was already absent from this area, noting that the area was fragmented and enclosed by residential activity. Mr Cubitt agreed with Mr Moore regarding the relevance of the SHLCA. He cautioned that the area was not an outstanding natural landscape and, as such, section 6(b) of the Act was not applicable. He noted that the land instability could be adequately addressed through conditions of consent and that stormwater and wastewater discharges could be managed. He referred to his written objectives and policy assessment and noted that he did not believe the proposal was contrary to these.

Mr Cubitt then turned his mind to the issue of precedence. While he considered that there was enough to set this site apart from other similar sites which may also seek to be subdivided, he believed that even if a precedent was set, this was unlikely to be undesirable. He accepted the draft conditions put forward by Mrs Darby but suggested that conditions regarding the planting out of the areas of instability as proposed by Mr Moore and the planting out of the slump area also be included.

Evidence of Submitters Summary

Ms Scott acknowledged the reduction in lot number from three to two and noted that this was an improvement but she remained concerned regarding drainage from the site to her property. She accepted that water drained downhill naturally but sought reassurance that the proposal would not exacerbate this issue. She was concerned that the disturbance required to develop the site might worsen the existing water and stability issues.

With respect to visual effects, Ms Scott considered that the existing barn was very obvious and she would prefer to see it painted a colour which was more sympathetic to the landscape. She sought to have all structures contained within identified building platforms and increased plantings. She noted that planting was required under the previous consent but this had not been carried out as she imagined.

Dr Mackey spoke to his pre-circulated evidence and identified the slump area. He noted that much of the earlier discussion had addressed many of his concerns. He reiterated that the proposed building platform for Lot 2 was the most stable location. He cautioned that earthworks and access track can exacerbate instability issues. He noted historic photographs show movement between the 1940's and now considered that the site remained dynamic. Dr Mackey noted that all instability issues were contained within the subject site and risk management did not rely on external influences. He considered that there were options available to improve the stability of the site.

Technical Council Officers' review summary

Mr Knox noted that the revised proposal was much improved from a landscape point of view. He supported the surrender of the building platform along the ridgeline and believed that this reduced the adverse effects down to minor to moderate. He noted that his reference to the SHLCA predominantly related to the view shafts only but he accepted that this should be given little weight by the Committee. Overall, Mr Knox reviewed his position and believed that the effects on landscape, beyond that which could occur lawfully on the site, were minor.

Ms McGaw noted that with the removal of Lot 3 from the proposal, the suggestion to connect to the Council's reticulated services was no longer a consideration and, as such, she had no additional comment to make regarding the proposal.

Mr Paterson was satisfied with Mr Lindquist's opinion that the slump feature would pose little risk to the building platform on proposed Lot 2 but he supported the inclusion of a setback. He also agreed with Mr Lindqvist that any risk to the proposed building platform on Lot 1 from the slump feature would be minor. When questioned by the Committee regarding the submission from the Fire Service which sought the burial of the firefighting water tanks, Mr Paterson noted that any disturbance of that extent would require engineering design but it was his experience that this was achievable.

Processing Planner's Review of Recommendation

Mrs Darby reviewed her recommendation. Overall, she was satisfied the reduction of the number of lots from three to two had reduced the adverse environmental effects such that the effects were no more than minor when compared with what could occur on the site as of right. She noted that the reduction of lot numbers also meant that the proposal was not contrary to the objectives and policies of the plan. It was her opinion after considering the revised proposal and evidence presented to the Committee, that the proposal now passed the gateway tests set out in s104D of the Act and the Committee could consider granting consent.

Mrs Darby remained concerned that the proposal would set an undesirable precedent and noted several other sites which could argue for a similar outcome. In her opinion, the only thing that may set this site apart from others was that there would be a reduction in environmental effects when compared with what could occur on that site as of right. Furthermore, the granting of consent would allow stricter controls to be imposed on the site. Overall, Mrs Darby believed that if the proposal was carefully and tightly conditioned, she could support the granting of the application subject to the Committee being satisfied in relation to the precedent issue.

Applicants Right of Reply

Mr Cubitt advised the Committee that he appreciated Mrs Darby's review of her recommendation. He noted with regard to the water draining on to Ms Scott's property this was natural drainage and while Mr Kelliher would investigate drainage options, he was unsure whether this could be addressed through the RMA process. He noted that building colours and building platforms had been offered as conditions; specifically noting that Mr Mackey considered the building platform for proposed Lot 2 was in the most stable location on the site. He agreed to arrange access to the site and ensure that the building platforms and slump area were marked out for the convenience of the Committee. Prior to the site visit he would provide a revised map which showed the slump area and its proximity to the building platforms. Finally, Mr Cubitt reiterated his request that consent be granted.

Statutory and Other Provisions

In accordance with Section 104 of the Resource Management Act 1991, the Planner's Report detailed in full the relevant statutory provisions and other provisions the Committee considered. Regard was given to the relevant provisions of the following chapters of the Dunedin City District Plan: 4 Sustainability, 6 Rural, and 20 Transportation and the relevant provision of the proposed Dunedin City District Plan. Statutory provisions considered included 5(2)(a), 5(2)(c), 6(b), 6(f), 7(b), 7(c), 7(f) and 7(g) within Part 2 of the Act. Regard was also given to the operative Regional Policy Statement for Otago and proposed Regional Policy Statement for Otago.

Main Findings on Principal Issues of Contention

The Hearings Committee has considered the evidence heard, the relevant statutory and plan provisions, the principle issues in contention. The main findings on the principal issues have been incorporated within the reasons discussed below.

Decision

The final consideration of the application, which took into account all information presented at the hearing, was held during the public-excluded portion of the hearing. The Committee reached the following decision after considering the application under the statutory framework of the Resource Management Act 1991. In addition, a site visit was undertaken during the public-excluded portion of the hearing, the Committee inspected the site and this added physical reality to the Committee's considerations.

SUB-2016-28

*That pursuant to Section 34A(1) and 104B and after having regard to Part 2 matters and Sections 104 and 104D of the Resource Management Act 1991, and the provisions of the Dunedin City District Plan and the Proposed Second Generation Dunedin City District Plan, the Dunedin City Council **grants** consent to a **non-complying** activity for a two-lot subdivision on the site at 82 Riccarton Road East, East Taieri legally described as Lot 28 Deposited Plan 341800 (Computer Freehold Register 171990), subject to conditions imposed under Section 108 of the Act, as shown on the attached certificate.*

LUC-2016-169

*That pursuant to Section 34A(1) and 104B and after having regard to Part 2 matters and Sections 104 and 104D of the Resource Management Act 1991, and the provisions of the Dunedin City District Plan and the Proposed Second Generation Dunedin City District Plan, the Dunedin City Council **grants** consent to a **non-complying** activity for one residential unit on each of new Lots 1 and 2 of SUB-2016-28 at 82 Riccarton Road East, East Taieri legally described as Lot 28 Deposited Plan 341800 (Computer Freehold Register 171990), subject to conditions imposed under Section 108 of the Act, as shown on the attached certificate.*

Reasons for this Decision

Existing Environment

- 1 The subject site is legally described as Lot 28 Deposited Plan 341800, held in Computer Freehold Register 171990, and has an area of 6.6862ha. The Committee notes that it is a generally rectangular shape, and is situated on the lower slopes of Saddle Hill immediately behind a line of residential properties fronting Main South Road. The predominant use of the site is residential with limited grazing. The areas to the north and east of the site are also predominantly residential in nature. The Committee accepts that the proximity of the site to neighbouring residential properties limits the available farming uses.
- 2 The Committee accepts that the existing site is already less than the 15ha minimum required by the Operative District Plan and presents a significant short fall should the minimum lot size promoted by the proposed District Plan be adopted. It considers that small rural blocks are unlikely to ever be independent and economically-viable properties. The land of the subject site is also sloping and not prime pastoral country, further reducing its productive worth. However, the Committee notes that some form of horticulture could be a viable use for this property.
- 3 The Committee acknowledges the changes to the application offered by applicant to reduce the number of proposed lots for the subdivision from three to two and accepts this amendment to the application. It considered that the proposed changes would result in a reduction of adverse effects from what was originally proposed and there was no need to re-notify the application.

Permitted Baseline

- 4 The Committee considered whether to apply the permitted baseline assessment to this application. While the Committee accepts that neither the District Plan nor the Proposed Plan allows any subdivision to occur as of right and no residential activity on the proposed lots is permitted, it recognises that one house can be established on the subject site courtesy of resource consent RMA-2005-369384. A building platform established by the resource consent has been approved for the subject site on new Lot 1.
- 5 The Committee note that RMA-2005-369384 was varied by LUC-2005-369384/A to allow for the use of a temporary house outside of the building platform. The built form of the barn/temporary dwelling is established and there is no mechanism to require the removal of the structure albeit that the kitchen is required to be decommissioned should the dwelling approved by RMA-2005-369384 be constructed.
- 6 As such, the Committee considers that one residential unit and the built form of the barn are the current lawful development potential of the site. It believes that this is the appropriate baseline against which the activity should be considered, and against which the proposal has been assessed. As a result, it is the effects arising from the proposal, beyond the permitted baseline, that are the crucial elements and these are considered further below.

Hazards

- 7 The Committee acknowledges that the slopes of Saddle Hill are recognised by the Council's Hazards Register as being subject to 10116 – Land Stability (land movement) and 11589 – Land Stability (land movement). The north facing slopes have been mapped on the McKellar geological map as being subject to slips. Land Stability is addressed by an existing consent notice on the title of the subject site which seeks to maintain the stability of the slopes through controls on planting and the positions of building sites. The ORC has submitted in opposition to the proposal, partly because of risk from natural hazards. The ORC has also identified the land instability issues with this land, and considered the original geotechnical report was deficient.
- 8 The Committee takes comfort in the amended geotechnical report prepared by Dr Jon K Lindqvist dated 18 May 2016 (submitted post-ORC submission) and its review by Council's consultant engineer, Mr Lee Paterson. Dr Lindqvist's report describes the geology of the landform of the subject site, and notes that the selection of suitable building areas is complicated by a broad area of shallow slides. Dr Mackey, in his evidence tabled at the hearing, accepts that the proposed building platform on new Lot 2 is one of the more stable areas on the site. However, Dr Mackey notes that there is evidence of disturbed terrain upslope of the proposed building platform and the building platform should be positioned sufficiently distant from this feature. He also considered that the instability hazard present by the slump feature would be improved by planting.
- 9 The Committee accepts Dr Mackey's recommendations and consent notices will be required to ensure the risk to the building platform on new Lot 2 posed by the slump feature will be mitigated. Furthermore, the Committee do not wish to see the management of this slump feature split between new lots 1 and 2 and consider that the boundary should be realigned (if required) to ensure this feature is contained entirely within new Lot 2.
- 10 The Committee acknowledges the Council's consultant engineers reservations regarding development within the site on steep slopes, particularly where there are previously mapped signs of instability. The Committee notes that further planting is proposed to mitigate an additional landslide stability risk as shown in green in *Figure 7: Amended Subdivision Plan, 82 Riccarton Road, East Taieri* submitted with further evidence received by Council on 9 August 2106. Where landslide features are contained within multiple properties, practical and co-ordinated management of the land becomes difficult. The Committee consider it is undesirable to have the stability of one property negatively influenced by a neighbouring landowner failing to undertake or maintain mitigation measures to maintain the stability of the slope within their property.

- 11 However, the Committee accepts that the stability of the site is currently managed through a Land Management Plan imposed by a consent notice which applies to multiple properties above East Taieri. Furthermore, the central landslide feature is sufficiently distant from any building platform meaning the risk to high-capital structures is reduced. As such, the Committee are comfortable with this management approach in this instance. A consent notice on each title will impose responsibility for the central planting onto each land-holder.
- 12 The Committee also accepts Dr Lindqvist's recommendation that drainage systems be installed to intersect and remove any surface water or spring water flow that might affect the stability of the ground in the vicinity of the building.

Landscape and Amenity

- 13 The Committee note that the subject site includes a ridgeline visible from State Highway 1 and land to the southwest. It is also seen as a foreground or middle ground element in many views towards Saddle Hill. However, the Committee notes that it is outside of any landscape management area, and, therefore, there are no specific controls on siting or the design of structures. The subdivision will, however, create undersized rural-zoned sites on a relatively prominent piece of land, and the effects on the landscape from this density of development must be considered.
- 14 The Committee takes guidance from the Environment Court in its determination on neighbouring developments which also sought to undertake development of a rural-residential nature within the rural zoned area. In those cases, the court was prepared grant consent for the subdivision into undersized lots at least in part because of the limited visual effects and impact on rural character but chose to decline the subdivision of the more visible land. The Committee notes that this proposed subdivision presents as visible from a number of vantage points.
- 15 The subdivision and subsequent development of new Lot 2 would introduce one additional dwelling to the property. In terms of visual dominance, the Committee consider that the building platform on Lot 2 is far less visually obvious than the existing platform which dominates the ridgeline of new Lot 1. The Committee considers that the building platform on new Lot 2 will integrate better with the built residential form fronting State Highway 1 and will nestle into the hillside rather than standing proud above it. The Committee recognises and accepts the applicant's offer to surrender the existing building platform and believes that this will have a positive visual outcome when compared to that which is authorised for the site currently. Conditions on building design, height, colours, landscaping and earthworks for the new dwelling on new Lot 2 are imposed to ensure that buildings are sympathetic to the form, character and scale of the landscape.
- 16 The dwellings will be seen against a backdrop of land, specifically Saddle Hill. During the site visit, the Committee became immediately aware of the dominance of the barn/temporary dwelling structure located on new Lot 1. The structure is light-coloured and two-storied situated on the ridgeline. It is particularly prominent when viewed from Riccarton Road West by traffic heading southeast. The Committee acknowledges and accepts the applicant's offer to paint the barn structure a more recessive colour which will enable it to integrate more sympathetically into the landscape.

Easements

- 17 The Committee accepts the assessment of the existing easements undertaken in the s42A report and notes that no further easements are proposed as part of this proposal.

Infrastructure

- 18 The Committee acknowledges that the subject site is located within the Rural zone and outside of the Urban and Rural Water Supply Areas as shown in Appendix A and B of the Dunedin City Council Water Bylaw 2011. The Committee accepts the comments of the Council's Water and Waste Consents officer that there is insufficient capacity in the network at this time to service either lot and any application for connection to reticulated services would not be supported by Water and Waste Services. Consequently, no reticulated water supply is available to the proposed subdivision. Stormwater collected from roof surfaces can be used for domestic water supply and should be stored in suitably sized tanks with a minimum of 25,000 litres of storage per lot. Water tank overflows are not to cause a nuisance to any neighbouring properties and should not be allowed to flow uncontrolled within the identified land instability areas.
- 19 As above, the Committee recognises that the primary source of potable water for the new lots will be rainwater collection from roof surfaces. It accepts the submission by the New Zealand Fire Service and advises the applicant that the new development will include the measures necessary to comply with the New Zealand Fire Service's Code of Practice for Fire Fighting Water Supplies.
- 20 The Committee recognises that under the Reticulated Utility Services (Water, Wastewater or Stormwater) Policy adopted by the Council on 22 February 2010 the subdivision is not entitled to a reticulated wastewater connection. New Lot 1 currently has a dwelling (barn) which is serviced with a septic tank for wastewater drainage. In terms of on-site effluent disposal, the Committee recommends systems that have been specifically designed for the site by a suitably qualified person. The effluent disposal systems will need to be confined within the boundaries for each lot and must be undertaken in a manner that does not exacerbate land instability issues. The Committee considers it is appropriate to impose a consent notice regarding the need for a specifically designed effluent disposal system.
- 21 Regarding the disposal of stormwater, the Committee notes there are no reticulated stormwater services available for connection and that stormwater will be reused on the site for potable water supply. The Committee recognises the concerns raised by Ms Scott that the proposal may exacerbate stormwater issues already experienced by her property. Ms Scott accepts the law of natural drainage but the Committee is keen to ensure that the problem is not made worse by the any development on the site. As such, conditions of consent are imposed to manage any potential nuisance stormwater to adjoining property from rights of way, driveways, drain coils and water tank overflows. Stormwater will also be required to be actively managed to avoid exacerbating any risk of land instability.
- 22 The Committee acknowledges the ORC's concerns that stormwater and wastewater discharges have the potential to exacerbate existing natural hazards on the site, namely land instability. The Committee is satisfied that stormwater and wastewater discharges arising from the proposed development can be adequately managed to address the matters raised in the submission by the ORC.

Transportation

- 23 The Committee accepts the advice from Council's Transportation Planner/Engineer that the existing access provisions to the site are acceptable. It agrees that the proposal will likely result in only a minor increase in traffic using the right of way. Driveways within new Lots 1 and 2 will need to be formed to an acceptable standard and this has been included as an advice note. Overall, the Committee are comfortable that the proposal will have no more than minor adverse effects on the safety and functionality of the transport network.

Earthworks

- 24 The Committee note that no consent for earthworks is sought with this application. It anticipates that earthworks will be required to form new accesses and the building platform. These earthworks can be assessed at the time of the development design. Accordingly, this consent does not address any earthworks for this subdivision associated with the development or redevelopment of the new lots, or earthworks for the formation of any new access, manoeuvring areas, or retaining walls (should any be required). Any earthworks design will need to be mindful of the hazard risk associated with the site and seek to avoid exacerbating land instability issues. The Committee advises the applicant that should future earthworks on-site breach the performance standards of Section 17 of the District Plan, further consent will be required. Land use consent will also be required for any structures, such as retaining walls supporting fill or surcharge, near to boundaries.

Archaeological Sites

- 25 The Committee are satisfied that there are no known archaeological sites on the subject sites, and neither Kai Tahu ki Otago nor Heritage New Zealand submitted on the application. However, the Committee are mindful that should any archaeological material be uncovered during any earthworks to develop the site, the applicant will need to obtain an archaeological authority before continuing further. This matter is administered by Heritage New Zealand in accordance with the Heritage New Zealand Puhere Taonga Act 2014. An accidental discovery protocol is included as an advice note.

Other Matters

- 26 During the hearing, it came to light in the applicant's evidence that they may be operating a commercial office and depot on the site. While not a matter to be considered as part of this consent application, the applicant is strongly advised to ensure the lawfulness of this use under the Operative Dunedin City District Plan rural zone rules. If the activity does breach the rural zone rules resource consent will be required.
- 27 The Committee notes that residential activity is already occurring on new Lot 1 and, as such, consider that it is appropriate to grant the land use consent in stages; Stage one being residential activity on new Lot 1 and Stage 2 being residential activity on new Lot 2.

Determination

- 28 Overall, the Committee is satisfied that any adverse effects of the proposal can be mitigated by conditions of consent as discussed above. The Committee especially notes the reduction in visual effects from the revised proposal for that permitted on the site, the careful management of the storm and waste water from the new developed area and the planting to manage the hazard risk.
- 29 With regard to the assessment of the objectives and policy, the Committee notes that the proposed District Plan is not far through the submission and decision-making process, the objectives and policies of the Operative Dunedin City District Plan have been given more consideration than those of the proposed District Plan. The Committee considers that the proposal is consistent with many of the objectives and policies of the operative Dunedin City District Plan and the proposed District Plan. The Committee feels that, while the proposal is inconsistent with those of amenity of Dunedin, rural productive worth, landscape, and the subdivision of rural land, it does not believe that the amended proposal is contrary to the relevant objectives and policies.
- 30 Overall, the Committee consider that the proposal satisfies both gateway tests contained in Section 104D of the Resource Management Act 1991 and consideration to the granting of consent to the proposal.
- 31 The Committee considered that the proposed activity is consistent with the relevant objectives and policies of the Regional Policy Statement for Otago and proposed Regional Policy Statement for Otago.

- 32 The Committee notes that the "true exception" test was regularly applied by the Court to non-complying activities. It is considered that the test is no longer compulsory as determined in *Mason Heights Property Trust v Auckland Council* [2011] NZEnvC 175, para [88]. However, *Mason Heights Property Trust v Auckland Council* does note that the test can assist the Court in assessing whether issues of precedent are likely to arise and whether the proposal meets the objectives and policies of the Plan by an alternative method. This approach was supported *Cookson Road Character Preservation Society Inc v Rotorua District Council* [2013] NZEnvC 194.
- 33 For completeness, the Committee recognises the applicant's offer to surrender the existing building platform located on the eastern extent of new Lot 1 in favour of a building platform on new Lot 2 and the retention of the barn (or its replacement) as a residential unit meaning that overall built form will not be increased on the site. The Committee believes this sets the application apart from other similar sites in this area and results in a true exception. As such, it will not threaten the integrity of the District Plan or establish an undesirable precedent for future applications.
- 34 The committee assessed the application against the relevant sections of the Act namely; 5(2)(a), 5(2)(c), 6(b), 6(f), 7(b), 7(c), 7(f) and 7(g). Overall, the Committee found that the proposal, if undertaken as amended by the applicant and in compliance with conditions of consent, will be consistent with the purpose of the Resource Management Act 1991 to promote the sustainable management of natural and physical resources.

Commencement of Consent

As stated in Section 116 of the Resource Management Act 1991, this consent shall only commence once the time for lodging appeals against the grant of the consent expires and no appeals have been lodged, or the Environment Court determines the appeals or all appellants withdraw their appeals, unless a determination of the Environment Court states otherwise.

Right of Appeal

In accordance with Section 120 of the Resource Management Act 1991, the applicant and/or any submitter may appeal to the Environment Court against the whole or any part of this decision within 15 working days of the notice of this decision being received. The address of the Environment Court is:

The Registrar
Environment Court
PO Box 2069
CHRISTCHURCH 8140

Any appeal must be served on the following persons and organisations:

- The Dunedin City Council.
- The applicants.
- Every person who made a submission on the application.

Failure to follow the procedures prescribed in Sections 120 and 121 of the Resource Management Act 1991 may invalidate any appeal.

Please direct any enquiries you may have regarding this decision to Kirstyn Lindsay, whose address for service is City Planning, Dunedin City Council, PO Box 5045, Dunedin 9058.

Yours faithfully

A handwritten signature in black ink, appearing to read "Andrew Noone".

Cr Andrew Noone
Chairman
Hearings Committee

Consent Type: Subdivision Consent

Consent Number: **SUB-2016-28 and LUC-2016-169**

Pursuant to Section 34A(1) and 104B and after having regard to Part 2 matters and Sections 104 and 104D of the Resource Management Act 1991, and the provisions of the Dunedin City District Plan and the Proposed Second Generation Dunedin City District Plan, the Dunedin City Council **grants** consent to a **non-complying** activity for a two-lot subdivision on the site at 82 Riccarton Road East, East Taieri legally described as Lot 28 Deposited Plan 341800 (Computer Freehold Register 171990), subject to conditions imposed under Section 108 of the Act, as shown below:

Location of Activity: 82 Riccarton Road East, East Taieri

Legal Description: Lot 28 Deposited Plan 341800 (*Computer Freehold Register 171990*)

Lapse Date: 19 September 2021

Conditions

1. *The proposal shall be given effect to generally in accordance with the plan prepared by Craig Horne Registered Surveyor entitled, 'Figure 7: Amended Subdivision Plan, 82 Riccarton Road, East Taieri' submitted with further evidence received by Council on 9 August 2016, and the accompanying information submitted as part of SUB-2016-28 received by Council on 28 April 2016 (and revised on 11 May 2016 and 9 August 2016), except where modified by the following:*
2. *Prior to certification of the survey plan pursuant to section 223 of the Resource Management Act 1991, the applicant shall ensure the following:*
 - a) *If a requirement for any easements for services is incurred during the survey then those easements shall be granted or reserved and included in a Memorandum of Easements on the survey plan.*
 - b) *The internal boundary between new Lot 1 and 2 shall be configured such that the scarp/slump feature shown on 'Proposed Subdivision of Lot 28 DP 341800', by Craig Horne dated 29 August 2016 and attached as Appendix 1 to this certificate, is contained entirely within new Lot 2.*
3. *Prior to certification pursuant to section 224(c) of the Resource Management Act 1991, the applicant shall complete the following:*
 - a) *That the landscape feature within the subject site shall be closely planted in accordance with the land management plan prepared by Geolink Land Investigations (undated), previously attached to Consent Notice 6451339.15 on CFR 171990.*
 - b) *The Geolink Land Investigations report of condition 3(a) above shall be attached to the consent notices of conditions 3(d) and 3(f) below.*

- c) *That a plan for new Lot 1 shall be prepared showing the building platform for this lot in accordance with the revised application plan received at Council on 9 August 2016, and the geotechnical reports submitted with this and previous subdivision and development applications for this land. The plan shall show:*

- (i) The platform dimensions;*
- (ii) Distances to boundaries;*
- (iii) The areas of known land instability as depicted on the revised plan (received at Council on 20 May 2016) prepared by Dr Jon K Lindqvist as Figure 1 of the geotechnical report: Geotechnical Assessment of Lot 3, part 82 Riccarton Road East, Dunedin, dated 18 May 2016;*
- (iv) The features of the plan shall be clearly labelled.*

The plan shall not show the previously identified building platform of Consent Notice 6451339.15 as this platform is to be surrendered as part of this subdivision proposal. The plan shall be attached to the consent notice of condition 3(d) below.

- d) *That a consent notice shall be prepared for registration on the title of new Lot 1 for the following on-going conditions:*

'There shall be only one residential unit constructed on this site in order to maintain the density of development in accordance with the resource consent decision of LUC-2016-169.'

'The dwelling for this site shall be fully confined to the building platform as shown on the attached plan to manage adverse visual and natural hazard effects. The siting, design, colours and landscaping of any dwelling shall be undertaken in accordance with the conditions of resource consent LUC-2016-169 – Stage 1.'

'The portion of the landscape feature situated within this site shall be maintained in vegetation as specified by the attached Geolink Land Investigations report for on-going land stability reasons. It is the landowner's responsibility to ensure that this planting is maintained in perpetuity, and to replant within a 12 month period if the slope is cleared.'

'Adequate drainage systems shall be installed and maintained to intersect surface water or spring water flows away from buildings.'

- e) *That a plan for new Lot 2 shall be prepared showing the building platform for this lot in accordance with the revised application plan received at Council on 9 August 2016 and the geotechnical reports submitted with this and previous subdivision and development applications for this land. The plan shall show:*

- (i) The platform dimensions;*
- (ii) Distances to boundaries;*
- (iii) The areas of known land instability as depicted on the revised plan (received at Council on 20 May 2016) prepared by Dr Jon K Lindqvist as Figure 1 of the geotechnical report: Geotechnical Assessment of Lot 3, part 82 Riccarton Road East, Dunedin, dated 18 May 2016;*

- (iv) The features of the plan shall be clearly labelled.*
- (v) A minimum 10m set back line in relation to any existing scarps or depressions.*

The plan shall be attached to the consent notice of condition 3(f) below.

- f) That a consent notice shall be prepared for registration on the title of new Lot 2 for the following on-going conditions:*

'There shall be only one residential unit constructed on this site in order to maintain the density of development in accordance with the resource consent decision of LUC-2016-169.'

'The dwelling for this site shall be fully confined to the building platform as shown on the attached plan to manage adverse visual and natural hazard effects. The siting, design, colours and landscaping of any dwelling shall be undertaken in accordance with the conditions of resource consent LUC-2016-169 - Stage 2.'

'All buildings shall maintain a minimum setback distance of 10.0m from any existing scarps or depressions on the slopes of this lot, as shown on the attached plan.'

'Any existing scarps or depressions on the slopes of this lot shall be densely planted to ensure stability of the site. It is the landowner's responsibility to ensure that this planting is maintained in perpetuity'

'The portion of the landscape feature situated within this site shall be maintained in vegetation as specified by the attached Geolink Land Investigations report for on-going land stability reasons. It is the landowner's responsibility to ensure that this planting is maintained in perpetuity, and to replant within a 12 month period if the slope is cleared.'

'Adequate drainage systems shall be installed and maintained to intersect surface water or spring water flows away from buildings'

- g) That the consent notice 6451339.15 shall be cancelled from the title of the subject site.*

Consent Type: Land Use Consent

Consent Number: LUC-2016-169 – Stage 1 and 2

Pursuant to Section 34A(1) and 104B and after having regard to Part 2 matters and Sections 104 and 104D of the Resource Management Act 1991, and the provisions of the Dunedin City District Plan and the Proposed Second Generation Dunedin City District Plan, the Dunedin City Council **grants** consent to a **non-complying** activity for one residential unit on each of new Lots 1 and 2 of SUB-2016-28 at 82 Riccarton Road East, East Taieri legally described as Lot 28 Deposited Plan 341800 (Computer Freehold Register 171990), subject to conditions imposed under Section 108 of the Act, as shown below:

Location of Activity: 82 Riccarton Road East, East Taieri

Legal Description: Lot 28 Deposited Plan 341800 (Computer Freehold Register 171990)

Stage 1 – new Lot 1 of SUB-2016-28

1. *The proposal shall be given effect to generally in accordance with the revised plan prepared by Craig Horne Registered Surveyor entitled, 'Figure 7: Amended Subdivision Plan, 82 Riccarton Road, East Taieri, submitted with further evidence received by Council on 9 August 2016, and the accompanying information submitted as part of LUC-2016-169 received by Council on 28 April 2016 (and revised on 11 May 2016 and 9 August 2016), except where modified by the following:*
2. *That only one residential unit shall be established on new Lot 1 of SUB-2016-28. The dwelling shall be fully contained within the approved building platform as shown on the consent notice plan attached to the Computer Freehold Register. The dwelling and any accessory buildings can be built within yard spaces where these are situated within the approved building platform. For clarity, farm accessory buildings may be established anywhere on the site except for the highly visible ridgeline providing they comply with the yard setbacks set out in the Operative District Plan for rural zones.*
3. *The existing workshop/barn building on-site (currently used as a dwelling) and any existing or future buildings, shall be clad and/or painted in a uniform non-reflective recessive colour being a muted tone of green, grey, brown, tussock or similar subdued colour, to blend in with the colours of the surrounding landscape. The consent holder shall submit details of the permanent colour and cladding of the existing building to Council for approval within three months of the deposit of the survey plan. Any changes to the colour and/or cladding work of the existing building on-site shall be undertaken within 12 months of the deposit of the survey plan in accordance with the approved details.*
4. *The consent holder shall submit a landscape development plan for the curtilage of the existing building or future permanent dwelling to the Resource Consents Manager for approval within three months of the deposit of the survey plan. The planting shall be undertaken in accordance with the approved landscape development plan within 12 months of the date of deposit of the survey plan for SUB-2016-28. At a minimum the landscape plan shall include:*
 - a) *The location of the planting on-site in relation to the residential dwelling;*
 - b) *The density of planting and the species to be used, the number of each species to be planted, and the age/grade/height of the plants at the time of planting.*
 - c) *The measures that will be utilised to ensure the successful long-term establishment of the plantings.*

5. *Should the existing barn/dwelling be replaced by a new dwelling, plans and elevations of the house and any residential accessory buildings shall be submitted to the Resource Consents Manager for approval, prior to lodging an application for building consent for the replacement dwelling. The plans shall detail:*
 - a) *The location of the proposed dwelling in relation to the boundaries and the approved building platform;*
 - b) *The dimensions of the proposed dwelling;*
 - c) *The nature and colour of the materials being used to clad and roof the dwelling;*
 - d) *The location and extent of any earthworks to be carried out;*
 - e) *A landscape development plan that will be implemented to mitigate the effects of the dwelling on the surrounding landscape.*
6. *The landscape development plan of condition 5(e) above shall show, as a minimum:*
 - a) *The location of the planting on-site in relation to the proposed dwelling;*
 - b) *The density of planting and the species to be used, the number of each species to be planted, and the age/grade/height of the plants at the time of planting.*
 - c) *The measures that will be utilised to ensure the successful long-term establishment of the plantings.*
7. *The planting identified in the landscape development plan of condition 6 above shall be completed within 12 months of the date of occupation of the new dwelling.*
8. *Should the existing workshop/barn building on-site (currently used as a dwelling) be replaced by a new dwelling, then a Stormwater Management Plan for the development of this lot shall be provided to the Water and Waste Services Business Unit for approval. The Stormwater Management Plan shall outline how stormwater from the new dwelling, any accessory buildings, and hard stand areas on-site will be managed to ensure post-development flows do not exceed pre-development flows, and to identify and address any downstream effects of the stormwater generated by the development. The stormwater management plan shall ensure that adequate drainage systems shall be installed and maintained to intersect surface water or spring water flows away from buildings. Once approved the stormwater management plan shall be implemented on the site.*
9. *Should the existing workshop/barn building on-site (currently used as a dwelling) be replaced by a new dwelling, then a suitable effluent disposal system to service the residential dwelling shall be specifically designed and installed by a suitably qualified person in order to minimise the risk of de-stabilising the land or adversely affecting neighbouring properties in any way.*
10. *Access to the new lot shall have a minimum width of 4.0m and a vertical clearance of not less than 4.0m high to ensure that the New Zealand Fire Service appliances have sufficient vehicular access to the property.*
11. *The dwelling shall have an adequate fire fighting water supply available at all times in accordance with SNZ PAS 4509:2008 in order to reduce the fire risk to the property. This can be stored in underground tanks or tanks that are partially buried (provided the top of the tank is no more than 1.0m above ground level) which can be accessed by an opening in the top of the tank so that couplings are not required.*
12. *A hardstand area shall be formed beside the tanks of condition 11 above so that a fire service appliance can park on it, if so required.*

Stage 2 – new Lot 2 of SUB-2016-28

Lapse Date - Stage 2 of LUC-2016-169 shall lapse 5 years from the date that the s223 certificate for SUB-2016-28 is issued.

13. *The proposal shall be given effect to generally in accordance with the revised plan prepared by Craig Horne Registered Surveyor entitled, 'Figure 7: Amended Subdivision Plan, 82 Riccarton Road, East Taieri, submitted with further evidence received by Council on 9 August 2016, and the accompanying information submitted as part of LUC-2016-169 received by Council on 28 April 2016 (and revised on 11 May 2016 and 9 August 2016), except where modified by the following:*
14. *That only one residential unit shall be established on new Lot 2 of SUB-2016-28. The dwelling shall be fully contained within the approved building platform as shown on the consent notice plan attached to the Computer Freehold Register. The dwelling and any accessory buildings can be built within yard spaces where these are situated within the approved building platform. For clarity farm accessory buildings may be established anywhere on the site providing they comply with the yard setbacks set out in the Operative District Plan for rural zones.*
15. *Prior to lodging an application for building consent for the dwelling, plans and elevations of the house and any residential accessory buildings, shall be submitted to the Resource Consents Manager for approval. The plans shall detail:*
 - a) *The location of the proposed dwelling in relation to the boundaries and the approved building platform;*
 - b) *The dimensions of the proposed dwelling;*
 - c) *The nature and colour of the materials being used to clad and roof the dwelling;*
 - d) *The location and extent of any earthworks to be carried out;*
 - e) *A landscape development plan that will be implemented to mitigate the effects of the dwelling on the surrounding landscape.*
16. *The landscape development plan of condition 13(e) above shall show, as a minimum:*
 - a) *The location of the planting on-site in relation to the proposed dwelling;*
 - b) *The density of planting and the species to be used, the number of each species to be planted, and the age/grade/height of the plants at the time of planting.*
 - c) *The measures that will be utilised to ensure the successful long-term establishment of the plantings.*
17. *The planting identified in the landscape development plan of condition 14 above shall be completed within 12 months of the date of occupation of the dwelling.*
18. *A Stormwater Management Plan for the development of this lot shall be provided to the Water and Waste Services Business Unit for approval. The Stormwater Management Plan shall outline how stormwater from the new dwelling, any accessory buildings, and hard stand areas on-site will be managed to ensure post-development flows do not exceed pre-development flows, and to identify and address any downstream effects of the stormwater generated by the development. The stormwater management plan shall ensure that adequate drainage systems shall be installed and maintained to intersect surface water or spring water flows away from buildings. Once approved the stormwater management plan shall be implemented on the site.*
19. *A suitable effluent disposal system to service the residential dwelling shall be specifically designed and installed by a suitably qualified person in order to minimise the risk of de-stabilising the land or adversely affecting neighbouring properties in any way.*
20. *Access to the new lot shall have a minimum width of 4.0m and a vertical clearance of not less than 4.0m high to ensure that the New Zealand Fire Service appliances have sufficient vehicular access to the property.*

21. *The new dwelling shall have an adequate fire fighting water supply available at all times in accordance with SNZ PAS 4509:2008 in order to reduce the fire risk to the property. This can be stored in underground tanks or tanks that are partially buried (provided the top of the tank is no more than 1.0m above ground level) which can be accessed by an opening in the top of the tank so that couplings are not required.*
22. *A hardstand area shall be formed beside the tanks of condition 21 above so that a fire service appliance can park on it, if so required.*

Advice Notes

- 1 Please check with the Council's Building Control Office, Development Services, to determine the building consent requirements for the work.
- 2 In addition to the conditions of a resource consent, the Resource Management Act 1991 establishes through Sections 16 and 17 a duty for all persons to avoid unreasonable noise, and to avoid, remedy or mitigate any adverse effect created from an activity they undertake.
- 3 Resource consents are not personal property. This consent attaches to the land to which it relates, and consequently the ability to exercise this consent is not restricted to the party who applied and/or paid for the consent application.
- 4 It is the consent holder's responsibility to comply with any conditions imposed on their resource consent prior to and during (as applicable) exercising the resource consent. Failure to comply with the conditions may result in prosecution, the penalties for which are outlined in Section 339 of the Resource Management Act 1991.
- 5 This subdivision consent shall lapse after a period of five years from the date of granting of this consent. This period may be extended on application to the Council pursuant to Section 125 of the Resource Management Act 1991.
- 6 If the consent holder:
 - (a) discovers koiwi tangata (human skeletal remains), waahi taoka (resources of importance), waahi tapu (places or features of special significance) or other Maori artefact material, the consent holder shall without delay:
 - (i) notify the Consent Authority, Tangata whenua and Heritage New Zealand and in the case of skeletal remains, the New Zealand Police.
 - (ii) stop work within the immediate vicinity of the discovery to allow a site inspection by Heritage New Zealand and the appropriate runanga and their advisors, who shall determine whether the discovery is likely to be extensive, if a thorough site investigation is required, and whether an Archaeological Authority is required.

Any koiwi tangata discovered shall be handled and removed by tribal elders responsible for the tikanga (custom) appropriate to its removal or preservation.

Site work shall recommence following consultation with the Consent Authority, Heritage New Zealand, Tangata whenua, and in the case of skeletal remains, the New Zealand Police, provided that any relevant statutory permissions have been obtained.
 - (b) discovers any feature or archaeological material that predates 1900, or heritage material, or disturbs a previously unidentified archaeological or heritage site, the consent holder shall without delay:
 - (i) stop work within the immediate vicinity of the discovery or disturbance; and

(ii) advise the Consent Authority, Heritage New Zealand, and in the case of Maori features or materials, the Tangata whenua, and if required, shall make an application for an Archaeological Authority pursuant to the Heritage New Zealand Pouhere Taonga Act 2014; and

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

Site work shall recommence following consultation with the Consent Authority.

- 7 Any vehicle access from the carriageway to the property boundary will be over road reserve and is to be constructed in accordance with the Dunedin City Council Vehicle Entrance Specification (available from Council's Transportation Operations Department).
- 8 This consent does not address any earthworks for this subdivision associated with the development of the new lots, or the formation of any new access, manoeuvring areas, or retaining walls. Should earthworks on-site breach the performance standards of Section 17 of the Operative Dunedin City District Plan, further consent will be required. Land use consent will also be required for any structures, such as retaining walls supporting fill or surcharge, near to boundaries.
- 9 The consent holder is advised to ensure that use of the site for any commercial office and depot activities is lawful and does not breach the Operative Dunedin City District Plan rural zone rules. If the activity does breach the rural zone rules, resource consent will be required. Failure to obtain a resource consent where one is required can result in enforcement action under the Resource Management Act 1991.

Issued at Dunedin this 19th day of September 2016



Andrew Noone
Chair
Hearings Committee

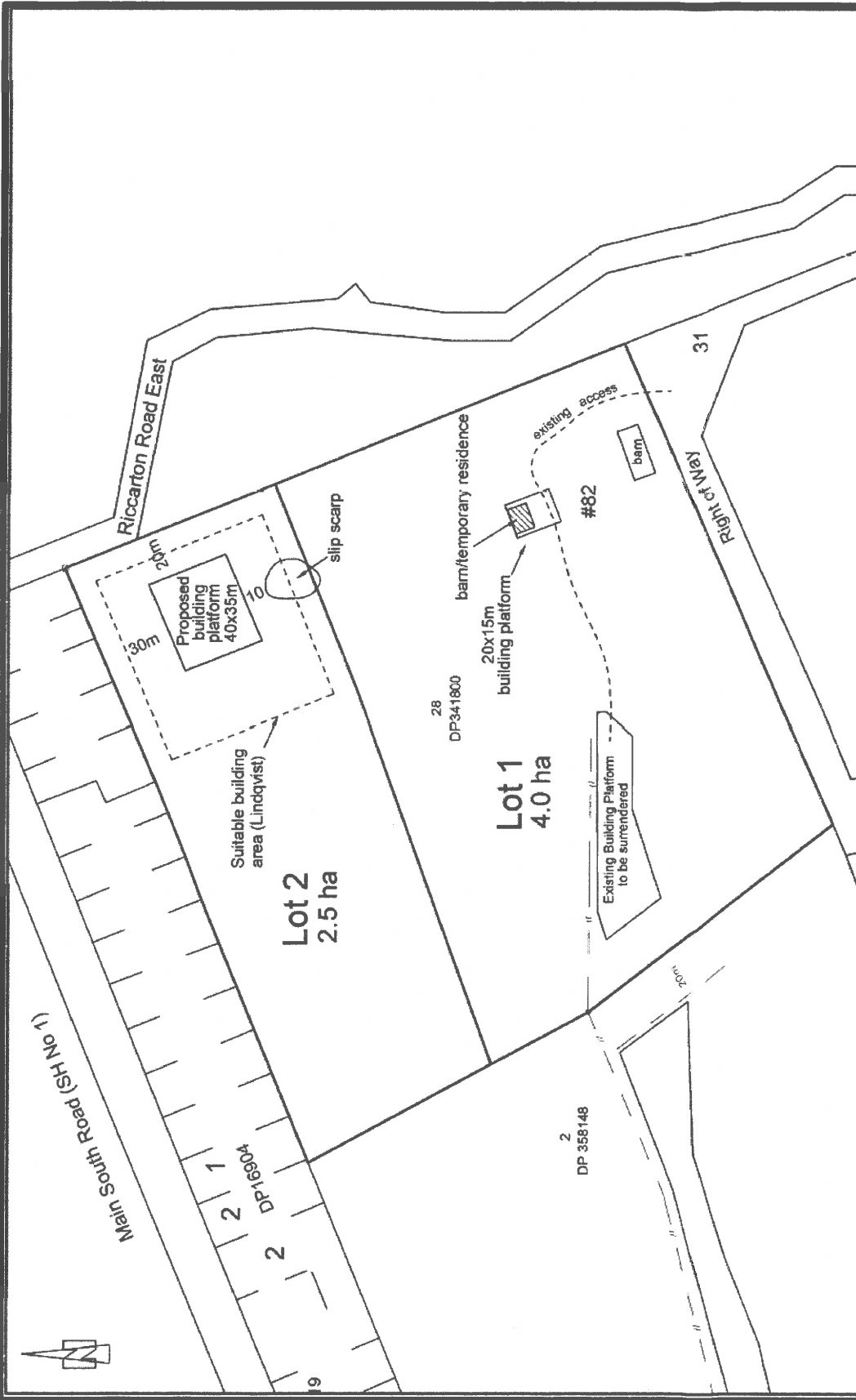
Appendix 1: Copy of Approved Plans for SUB-2016-28 and LUC-2016-169
(Scanned images, not to scale)



Figure 1 Plan of the 82 Riddcarton Road East property. A suggested building area within proposed Lot-3 is indicated east of the area of shallow disturbed ground.



Figure 7 : Amended Subdivision Plan, 82 Riccarton Road, East Taieri
Scale 1:1500 (A3)



CRAIG HORNE Registered Surveyor		Proposed Subdivision of Lot 28 DP341800 82 Riccarton Road East, East Taieri		For: Kelliher		SHEET 1 OF 3	
5 MAIN SOUTH EAST TAIERI P.O. BOX 56 MOSGIEL				Drawn CH Traced		Checked 29 August 2016	
PH (03) 4847008 FAX (03) 4847008						A3 SCALE 1:1500	