

**TO:** Bede Morrissey, Policy Planner, City Development  
Trevor Watson, Contractor, DCC Transport

**FROM:** Input from Antoni Facey, Facey, Avanzar Consulting (statement of evidence provided)

**DATE:** 02 September 2022

**SUBJECT:** DCC TRANSPORT – RESPONSE TO SUBMITTER EVIDENCE

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# **STATEMENT OF EVIDENCE OF ANTONI FACEY**

## **BEFORE THE VARIATION 2 HEARING PANEL**

**IN THE MATTER**

of the Resource Management  
Act 1991

**AND**

Variation 2 to the proposed  
Second Generation Dunedin City  
District Plan (2GP)

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**STATEMENT OF EVIDENCE OF ANTONI FACEY FOR DUNEDIN CITY COUNCIL**  
**Dated 31 August 2022**

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## **QUALIFICATIONS AND EXPERIENCE**

1. My name is Antoni Facey.
2. I am employed by Avanzar Consulting as a Director and Traffic Engineer. In this role, I prepare and present transport assessments, safety audits and general traffic engineering analysis and design for private clients, government departments and Local Authorities. I have also assessed transport assessments supporting Resource Consents presented to Local Authorities including Dunedin City Council where they do not have sufficient capacity or expertise to assess the Assessment internally.
3. I hold a Bachelor of Engineering (Civil) from Auckland University. I am a Chartered Member of Engineering NZ, Member of the Transportation Group of EngNZ, Board Member of the TRIPS Database, National Councillor for the Automobile Association, APEC Engineer and IntPE(NZ). I have practised as a Professional Engineer in Local Authorities, government departments and private practice since 1987.
4. I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## **SCOPE OF EVIDENCE AND OVERVIEW**

5. I have been engaged by the Dunedin City Council to provide expert transportation advice in relation to the Variation 2 greenfield rezoning hearing.
6. I have contributed to the evidence of Mr Trevor Watson regarding the transportation effects and considerations for the various greenfield rezoning sites.

## **CONCLUSION**

7. It is my opinion that the information provided to Mr Trevor Watson is correct.

**DATED** this 31 day of August 2022

### **Antoni Facey**

Director and Traffic Engineer  
Avanzar Consulting Ltd

## **SUMMARY / INTRODUCTION**

1. This memo contains my response to submitter's transportation evidence, and any transportation discussion that occurred during the hearing.
2. In view of the technical aspects of some of the issues raised in the submitters evidence and at the hearings, I have sought the advice and input of Mr Antoni Facey, a qualified Transport Engineer, in reaching the final transport positions as set out in this paper. Mr Facey's qualifications and experience are set out at the start of this memo.

## **OVERALL TRANSPORT CAPACITY COMMENTS**

3. In response to a request for advice regarding the overall effects of enabling the full extent of the development capacity considered as part of the Variation 2 Greenfield hearings, I can respond as follows:
4. The additional capacity that would be enabled (should all of the DCC-proposed and Requested Sites (RS) greenfield sites being considered as part of the current hearings be zoned residential) would not in my view be likely to have a significant overall effect on the wider transport network. I say that in the context that the level of capacity now enabled, particularly in the Mosgiel - Taieri area through the various appeal mediations late last year, will result in significantly greater capacity/impacts than those from the current Variation 2 sites.
5. In support of this view, I can advise that at the time of the various appeal mediations, we sought some high-level transport modelling advice from our consultants, Jacobs. Their overarching advice at that stage was that whilst the increased levels of development may have some degree of impact on the transport network, this was most likely to be in terms of additional congestion at various locations across the wider Dunedin area.
6. All of that said there are a number of improvements that are likely to be required – particularly as some of the larger mediated appeal sites come forward for development which will need to be funded. The extent to which the costs of these will fall upon Council as opposed to the developer – the public / private benefit issue will still need to be worked through.
7. In this respect, I am not aware that there is any budget allocations within the current Long Term Plan (LTP) to fund the Councils element of these costs.

## **DCC PROPOSED SITES**

### **GF01 - Part 155 Scroggs Hill Road, Brighton**

#### **Submitter Evidence**

1. The planning evidence from Emma Peters suggests that an ITA would be required at the subdivision stage but provides no details as to how the identified transport concerns could be satisfactorily addressed.

### **Transport Position**

2. Submitters addressed the hearing on 23/08/22. Emma Peters is of the view that, for the GF01 land, that only localised improvements would be required, i.e. footpath provision / improvements / localised road widening, that could all be dealt with at the subdivision stage.
3. Whilst these comments are noted, no expert transport evidence was provided to the hearing to support this position. In the circumstances, no change to previously advised position that the GR1 area on its own would require significant roading improvements at the southern extent of Scroggs Hill Road. Therefore, for the reasons set out above, DCC Transport remain unable to support the proposed rezoning.

### **RS160 - Part 155 and part 252 Scroggs Hill Road, Brighton & RS220 53 etc Scroggs Hill Road, Brighton**

### **Transport Position**

4. See notes above for GF01 which are also relevant for these sites. For the RS160 site, Emma Peters acknowledged that this would be likely to require wider improvements to the network and therefore recommended rezoning, but subject to an RTZ so that the site would not be released until the wider transport improvements had been undertaken / agreed. She also noted that she wasn't representing the owners of site RS220.
5. Whilst noting the proposed approach, the works required to improve Scroggs Hill Road are significant and, as noted, may not be possible without land acquisition and significant engineering works. In the circumstances, on the basis that there is no certainty that these works could be delivered within the foreseeable future, I remain of the view that the site should not be rezoned for residential purposes at this stage from a transport perspective.

### **GF02 & GF02a 201, 207 & 211 Gladstone Road South, East Taieri**

### **Transport Position**

6. No new transport issues raised in the presentations to the hearing, therefore no changes to previously advised position.

### **GF03 16 Hare Road and 7 Kayforce Road Ocean View, Brighton**

### **Transport Position**

7. No new transport issues raised in the presentations to the hearing, therefore no changes to previously advised position.

### **GF04 Part 127A Main Road, Fairfield**

### **Transport Position**

8. No new transport issues raised in the presentations to the hearing, therefore no changes to previously advised position.

## **GF05 and GF05a Parts 353 Main South Road, Fairfield**

### **Transport Position**

9. Submitters addressed the hearing in support of the proposals 17/08/22.
10. In respect of the Panels question regarding the potential for a pedestrian crossing being provided over Main South Road, the need for such a facility could be considered at the time of subdivision, through an ITA. Therefore, I remain of the view that the rezoning of this site could be supported.

## **GF06 27 Weir Street and Part 1 Allen Road, Green Island**

### **Transport Position**

11. No submitters presented at the hearing and no evidence provided, therefore no changes to previously advised position.

## **GF08 Part 19 Main South Road, Concord**

### **Transport Position**

12. Site promoter addressed the hearing 18/08/22. No new evidence presented to affect the previously advised DCC Transport position.

## **GF09 41 - 49 Three Mile Hill Road, Halfway Bush**

### **Transport Position**

13. Submitters against the rezoning addressed the Panel 18/08/22 PM. No issues raised that warrant any changes being made to the original DCC Transport position.

## **GF10 32 & 45 Honeystone Street Helensburgh**

### **Transport Position**

14. Whilst the submitters comments regarding the desirability / practicality of providing for a roading link between the GF10 and GF11 sites are noted, no change to previously advised position.
15. In terms of the specific Panel question regarding site connectivity issues between the GF10 and GF11 sites, it is considered that this link would be desirable particularly should the applicant for any reason not be able to secure the access as they are suggesting from Wakari Road.

## **GF11 & GF11a Wakari Road Area**

### **Submitter Evidence**

16. Evidence provided by Terramark who also spoke at the hearing. Proposed layout provided showing a 61-lot subdivision on the area of 195 Wakari Road. This also provides for a potential connection to the adjoining land. A detailed drawing showing the potential entrance layout is also provided.
17. Evidence of Darryl Sycamore Terramark on behalf of JKS Paddock Limited. Notes that the GF11 area relates to 10 sites as shown in figure 1 of the evidence. Paragraph 28 references a concept plan that has been prepared included as Appendix 1&2. A 16m wide access formation is proposed including an 8m wide carriageway with 1.5m footpaths on each side. The formation includes a roading layout over 245 Wakari Road. 61 new lots have been identified within the site and roading layout. Paragraph 36 refers to the access encumbrance and the existing right of way providing vehicle access to 163, 165, 167, 169, 171, 173, 175, 177, and 179 Wakari Road. It suggests that this was initially sought to be removed but is now proposed that it is retained and used for amenity, screening and biodiversity plantings within the reserve areas. Considers that any roading upgrades necessary can be dealt with via the subdivision process which has sufficient rigour to address these issues. Also does not consider that a bridge connecting to Honeystone Street is appropriate, due to costs and the need for ORC consents etc. together with the impact on existing vegetation and the bank profile. Notes that an ITA would be required to identify the required upgrades and that the RTZ would be subject to a cost sharing agreement being in place or the required upgrades would need to be included in the DCC's 10-year plan, and funding could then be recovered via development contributions.
18. Considers that the ITA could be carried out as part of the subdivision process.
19. Evidence of Emma Peters on behalf of Grant Motion. Mr Motion owns the property at 312 Wakari Road which is 1.8ha. Mr Motion supports the GF11 change. A structure plan for the land has been prepared by Terramark, and this is included at Figure 4 and also Appendix 3 of the submitters evidence. The evidence refers to an on-site meeting with DCC Transport and that there is space to provide for pedestrian access and possible street lighting along the frontage of 312 Wakari Road. Concludes that the subdivision process is capable of dealing with the transport effects of development at the time. Notes also that the wider transport upgrades are the responsibility of the Council. Also, that there is no need to provide for future linkages as due to topography it is more likely that residential intensification will be accessed via Polwarth and Cathcart Roads. Therefore, there is no justification for the RTZ overlay.

### **Transport Position**

20. In terms of details, the proposed access is good, but it would not appear as though the submitter has control over the full extent of the land to make their proposal happen. If they cannot secure the ROW land, this will not be acceptable. If they can provide the access as proposed, they don't then need the Honeystone connection (i.e. a link with GF10). If not, the Honeystone connection remains important.
21. Whilst an incremental / phased development of the site may not initially give rise to the requirement for the Wakari Rd upgrade, (due to the location of their access), the upgrade will still be required as a result of the development of the site as a whole.

22. Pedestrian and cycle facilities will be required on Wakari Road, and the streetlighting will need upgrading too.
23. Ideally Wakari Road should have its status upgraded in the 2GP to 'Collector ' when the development occurs albeit it is accepted that this would need to be dealt with through a separate subsequent process.
24. In summary and as noted above, the site needs to be developed comprehensively. At this stage the evidence is not necessarily sufficient to justify the uplift of the RTZ from a transport perspective.
25. Submitters addressed the hearings 22/08/22. Transport issues were referenced by both Darryl Sycamore and Ben Kidston. The main issue raised was that there should be a specific RTZ applied over the Kidston land (195 Wakari Rd), as opposed to the whole site area which would then allow for its specific release upon agreement in respect of any transport issues required. This on balance may represent an approach that could be supported having regard to the size of the site in question, its ability to provide access to Wakari Road, and in order not to delay the release of part of the overall site having regard to the number of land ownerships in terms of the wider site area.
26. With respect to the land at 312 Wakari Road. The submitters addressed the hearing on 22/08/22. Their preparedness to provide for the necessary localised roading upgrades, such as increasing the road width as it relates to their sites frontage together with related street lighting etc at the subdivision stage was noted. This approach could be supported subject to decisions on wider issues regarding the need for the retention of the RTZ over the whole of the GF10, GF11 and GF11a.
27. Also refer to comments in response to the Panel's question re site connectivity under GF10 and the issue of an RTZ.

## **GF12 233 Signal Hill Road**

### **Submitter Evidence**

28. Evidence submitted by Paterson Pitts. Sets out that the rezoning will provide for a maximum of 8 dwellings. Suggesting various options for accessing the site, firstly a full road upgrade from the junction of Pleasant Place and Birchfield Avenue to the site at 233 Signal Hill Road, as per the submitted plan. Likely total cost of this is in the order of \$309,000 which would work out at approximately \$40,000 per lot. Considers this to be achievable. Second option would be a right of way out to Signal Hill Road, albeit noting that this would not necessarily provide for non-motorised transport modes, though that the current footpath off Pleasant Place could be extended to provide such access. The third option would be to provide a road connection from North Road through 235 Signal Hill Road. Notes though that this option would require the consent of the adjacent landowner so it not an option that the submitter has full control over.
29. A subdivision roading plan is also included as part of the submitters evidence.



### **Transport Position**

30. Pleasant Place is currently unsurfaced beyond number 8C Pleasant Place, and would need some considerable improvement to provide a satisfactory access to the site. Whilst noting the submitters position, there are still a number of detailed access considerations here that would need to be resolved.
31. Submitters addressed the Hearing on 22/08/22, and set out (as per their evidence) the opportunity for improving Pleasant Place in order to provide access to the site. This, as already noted, would require not insignificant engineering works which would come at a cost. The option of requiring these works as part of a Structure Plan as part of rezoning the site was tabled, as opposed to this being considered as part of a subdivision application. It being acknowledged that this would provide a more robust approach to ensure that the required works were carried out. That said the issue was raised as to the ability to have a Structure Plan that extends beyond the site.
32. Considering all of the above, the upgrading works to provide access are significant and without detailed engineering plans being provided at this stage to demonstrate that the upgrades are in fact achievable, I remain of the view that the proposed rezoning cannot currently be supported from a DCC Transport perspective.

### **GF14 336 & 336A Portobello Road, The Cove (Weller Street)**

#### **Submitter Evidence**

33. The applicants surveyors have provided further details as part of their evidence to the hearings. Further additional details were provided on 08/08.
34. Evidence from Darryl Sycamore sets out that, should the rezoning be approved, the submitter intends to seek consent for a 9-lot subdivision. A concept plan is included in Figure 1 of his evidence. Mr Sycamore notes that proposed Lots 1-3 will be accessed from a 4.5m wide right of way. References the evidence of Ms Grace Ryan that access from Portobello Road will be upgraded. Emergency vehicles will be able to access Weller Street. Proposed Lot 10 will form a balance lot comprising 5.7 ha (located in the SNL) to which all Lot 1-9 owners will have access for recreation. Considers that the transport evidence of Grace Ryan adequately addresses the detailed transport concerns that are raised in the Section 42A report.
35. Mr Sycamore also seeks removal of the proposed NDMA overlay.
36. Mr Sycamore notes that the transportation evidence concludes that the proposal involves reconstruction of Weller Street, and this is expected to significantly improve the long-term safety, legibility and operation of the Weller Street intersection and Weller Street itself.
37. Evidence from Grace Ryan (GHD Transport) concludes that the vehicle trip generation from an additional 9 units will generate negligible additional transport movements, and broadly would not require a different type of intersection control from the existing uncontrolled T intersection with Portobello Road. The proposed upgrade of Weller Street and improvements at the Weller Street / Portobello road intersection included with the development will substantially improve the safety and access of the existing intersection and Street, and more than mitigate the minor adverse efficiency effects that would occur with the increased

transportation demands on Weller Street as it exists. Notes the good connectivity to the city including the improved walking and cycling path.

### **Transport Position**

38. It is noted following on from the more detailed review of the evidence and the site circumstances that the proposed works are all on road reserve, so no private land is involved at the Portobello Rd end of the site (as was initially considered to be the case).
39. The additional details presented through the evidence and to the Hearings went way to addressing a number of the initially identified concerns.
40. Further to the Hearings presentations Antoni Facey met with Grace Ryan to discuss in more details the proposed transport implications. The further information now provided clarifies the access arrangements well enough to demonstrate there is a solution. Optimisation would be the expectation through the detailed design process to make improvements.
41. The width of the access at Portobello Road is almost 5m which is approximately 2 lane.
42. Visibility to the east when exiting the road is adequate with a short length between 60 and 80. (Minimum sight distance required from the 2GP is 97m for a 70 km/hr speed limit.) It may be possible to improve this in detailed design but most drivers using the exit will be familiar with the limitation and should wait to ensure there are no hidden vehicles. If not for the curve on Portobello Road, the sight distance would be very large. The bus stop is not visible but a bus slowly accelerates so the sight distance to a slow bus is adequate. If the bus achieves 50 km/hr by the time it is visible (unlikely) it would require 69m sight distance.
43. There will be a lot retaining wall construction and reconstruction to achieve this design. They have shown that there is no encroachment on private property with the completed retaining wall construction. The applicant may have to negotiate temporary access for construction but that is an issue that will need to be addressed at the time.
44. Waste collection could be a problem if the vehicles cannot drive on site. The increased number of dwellings would require more area on Portobello Road to store bins. Ideally, the truck will drive along Weller so residents do not have to bring bins to Portobello Road. Note that they currently bring bins down along the narrower carriageway so bringing them down along a generally wider carriageway and footpath would not present problems. The truck turning out of Weller St would be a problem though but there are currently large gaps in traffic flow in the off peak period when the rubbish truck will be present that would allow manoeuvring if required.
45. Cyclists will have similar grades to the ones they have now. There are no options to change grades for them. Note that NZS4404 would probably suggest cyclists sharing the carriageway for this type of development.
46. As well as cyclists, the grade will be unsuitable for disabled pedestrians but it is existing on a steep hill slope so buyers will know these restrictions and consider their purchase accordingly.
47. The small number of drivers turning to and from the east will have a difficult manoeuvre. However, the increased width of the access being able to use the whole width of the access (when there are no oncoming vehicles) will be an improvement on the existing. The designer has observed drivers performing the U-turn shown in the ITA so it is already

understood and acknowledged by the residents who have found a safe way to access the east. Given the small number of vehicles expected to travel east, this would appear to be manageable.

48. The legal road currently ends at approximately station 85.
49. Regarding the remainder of the road on private property, this will need careful consideration in the ITA stage. It would appear to be possible to build but the amount of retaining wall and its proximity to neighbouring properties will need consideration. Grades are up to 19% which is not unexpected in this type of environment. While the retaining walls in the road reserve are shown almost 3m high, the DCC may have no option but to assume ownership once constructed. The remainder of the road with retaining walls up to 2.6m high would be a potential risk. The applicant suggests they will want to vest the roads to socialise the risk. Notwithstanding the comments above this should not hold back rezoning and would need to be dealt with later.
50. My view is that there is enough information now that there appears to be a solution (albeit non compliant and with minor deficiencies) that could be accepted and the further improvements may be achievable. The main concern could be the turns to and from the east which it does not appear possible to improve.

#### **GF15, 16 & 17 23,25 McAuley Road and 1693,1687 &1661 Highcliff Road, Portobello**

##### **Transport Position**

51. No new transport issues raised in the presentations to the hearing, therefore no changes to previously advised position.

#### **RTZ1 & RTZ3 – RTZ1 30 Mercer Street, Kenmure and RTZ3 13 Wattie Fox Lane, Kenmure (Barr Street)**

##### **Submitter Evidence**

52. No evidence from the submitter provided prior to the hearing in respect of how they would seek to overcome the concerns outlined in the s42A report.
53. Submitters presented to the hearing 24/08/22, and provided a paper to which they spoke in some detail. Noted that they have control of the property at 127 Barr Street and that this will be demolished as part of the proposed development on the site. They also noted that they have had discussions with the adjoining landowners, Munro's, and that there is the opportunity to provide for an additional access through this site, this also may provide opportunities to develop additional land, albeit accepting that is a matter for a later date.

##### **Transport Position**

54. The main transport issues raised were in relation to the need to provide for the proposed roundabout at the junction with Wattie Fox Lane and Kaikorai Valley Road and the actual need for such a facility, the submitter referencing his own personal experience in this regard and also the ability to turn left and to head into Town via Kenmure Road. In further support of their position (that a roundabout is potentially not required), they set out the ability for traffic

to exit in 5 possible directions from Barr Street. Additionally, the submitter referenced the sustainability of the site in terms of both public transport options available, and also non car transport modes available, in particular referencing the proposed Tunnels Trail through the Caversham Tunnel.

55. The submitter advised of the likely number of units that they envisaged at GR2 zoning, accepting that the extent of infrastructure upgrades required would be dependent upon the overall sites yield. They went on to note that these could be discussed / considered as part of a future subdivision application.
56. Updated plans were presented to the Panel, these are not significantly different from those previously provided, noting that there is now the potential for a connecting road being provided to Kaikorai Valley Road. This though, as noted, is the subject of future more detailed discussions with the current landowner – Munro's. That notwithstanding, in terms of internal site layout issues, these could be satisfactorily addressed at the subdivision stage.
57. Whilst the Panel Chair considered that the issues of the provision of a roundabout was one for another day, a question was raised by another Panel member regarding the proposed roundabout, the nature of the specific design and how it sits with the proposed development of the site and its likely timing.
58. Regarding the issue of the proposed roundabout the advice of my colleague Ian Martin the Councils Principal Safety Team has been sought. The clarification provided by Mr Martin is that the zoning of the site does not, on balance, need to be contingent on the provision of the roundabout. In the circumstances it is considered that the zoning of the site could be supported and that any necessary transport infrastructure upgrades could be addressed as part of an ITA at the subdivision stage.

## **RT22 87 Selwyn Street North, North East Valley**

### **Transport Position**

59. No new transport issues raised in the presentations to the hearing, therefore no changes to previously advised position.

## **REQUESTED SITES**

### **RS14 - Freeman Close and Lambert Street Abbotsford North Taieri Road**

#### **Submitter Evidence**

60. Evidence provided by Paterson Pitts in relation to 42A Lambert Street. Notes that, due to a number of constraints, it is only likely that a maximum of 73 dwellings would be achievable in terms of yield. The submitters view is that this number of additional units would have a less than minor effect upon the transport network. In the event that minor network upgrades are required for this number of units, the submitter would welcome discussions with DCC Transport in this regard.
61. Evidence provided by Paterson Pitts in relation to 55 McMeakin Road, total area 15.16ha. The evidence notes that it also relates to the area of 25 and 45 McMeakin Road (see details in the

paragraph below). Two rezoning options are put forward, each with its own proposed Structure Plan. The broad region plan covers some 29.30ha, and could provide for up to 327 sites, whereas the smaller are of 3.41ha has a realistic yield of 35 sites. There is acknowledgment that, for the larger area, there will be likely to be quite significant implications for the existing transport infrastructure. In order to deal with this, submitters propose the construction of a new section of Abbotts Hill Road. In terms of the smaller area, it may be more appropriate to require an upgrade to the extension of McMeakin Road to achieve a fully sealed carriageway and a footpath between North Taieri Road and the furthest extent of the rezoning land.

62. Evidence provided by Paterson Pitts, as noted above, relates to four areas. With respect to 25 McMeakin Road this has a total area of 2.66ha. The evidence largely covers off the same issues as raised in relation to the 55 McMeakin road site.
63. Transportation evidence also provided by Ms Emma Peters on behalf of Wendy Campbell in relation to 45 McMeakin Road and part of 188 North Taieri Road. The proposed area will have two access points from McMeakin Road, and an emergency route only through 188 North Taieri Road to North Taieri Road. Refers to the evidence provided by Paterson Pitts and the feasibility of providing access from both McMeakin Road and also Abbotts Hill Road, the conclusion being that the Abbotts Hill Road option presents the most feasible approach, due to the more appropriate terrain that it traverses, having sufficient legal width and lower likely constructions costs.

### **Transport Position**

64. A large amount of detailed evidence provided. Clarity is required on how the proposed roading connections might work. That said using McMeakin / Abbotts Hill Road and upgrading as suggested would still mean that there was a considerable increase in traffic using North Taieri Road. The identified downstream effects on the network / related junctions would still remain and haven't been adequately addressed in the submitters evidence. Furthermore, there would need to be a comprehensive approach to the development of the overall site rather than it being developed in a piecemeal way. Concerns as previously identified still remain.
65. Following on from a site visit, it is noted that Abbotts Hill Road would require widening and some considerable degree of improvement along the existing length. With regard to the proposed extension, this would require significant engineering works and there remain a number of questions as to how practical / achievable these are in terms of overall costs and the level of work involved. Without this detailed information being provided including the effects of the proposed link roads provision on connectivity (including the traffic flows between Abbotsford and Brockville) this proposal is not supported. McMeakin Road is currently unsurfaced, so would also need some degree of improvement to service the level of development proposed.
66. Overall, I consider that both the site specific / local issues together with the wider detailed concerns still remain. Therefore, no change to the previously advised DCC Transport position. I also note that if these sites were to be developed, this would need to be comprehensively and not in a piecemeal way.

## **RS109 – 119 Riccarton Road West**

### **Transport Position**

67. The Panel requested that DCC Transport provides comment on the likely impact of the development, in particular on Riccarton Road, should the rezoning proceed. The proposal is now to zone the site LLR2 which would result in 3 additional dwellings. It is considered that the development would have no noticeable impact on the surrounding transport network nor Riccarton Road in particular.

## **RS110 - 23 Sretlaw Place / 118 Brockville Road**

### **Submitter Evidence**

68. Evidence submitted by Emma Peters. See paragraphs 8-15 regarding the potential for use of private rights of way to access the site and discussions with the relevant landowners. However, it is noted that right of way A contains land that is held within 25 Sretlaw Place and that the landowner is a further submitter who is opposing the development. With respect to right of way B, this contains land held within 18 Sretlaw Place. It is noted that the submitter is in discussions with the owner regarding the potential for purchasing right of way B subject to the land being rezoned. The suggestion in respect of right of way A being that the Council could use its compulsory purchase powers to acquire the necessary land to form the legal road to RS110.

69. Various layout options proposed, including a possible one-way access proposal.

### **Transport Position**

70. Whilst the evidence of the submitters regarding the two proposed rights of way is noted, if there is no realistic possibility for the applicant to secure access through right of way A then it is difficult to see how the access issues could be satisfactorily overcome.
71. Emma Peters, on behalf of the submitters, addressed the hearing on 24/8/22. The key issue from a transport point of view continues to relate to the ability of the submitter (landowner / site promoter) to access the site via the land within the ownership of 25 Sretlaw Place. It was acknowledged by Emma Peters that the number of lots proposed would be in accordance with the Councils standards requiring the provision of a legal road (albeit the potential for an exception to this requirement within the 2GP was noted).
72. In response to the Panels questions, Emma Peters agreed to seek further advice / a legal opinion in respect of the access issues, noting as set out in her evidence the ability under the Public Works Act for the Council to acquire the land.
73. A specific question was then asked by the Panel Chair in respect of whether the Council would consider using the Public Works Act to acquire land to access the site for a site that the Council is not promoting for development? The answer to this question is no.
74. Submitters against the development subsequently addressed the Panel. Whilst all of the submitters would be prepared to accept a small number of lots, up to a maximum of five in total, the key matters in terms of access were raised by the owner of 25 Sretlaw Place, who owns the right of way that would need to be used to access the site. Whilst noting Emma

Peters' position regarding the potential for her client to provide for increased use of the ROW despite the owners objection – legal advice to be sought by Emma Peters in this regard, the landowner also confirmed that part of his unencumbered property would also need to be acquired to provide for a legal width access road.

75. In the circumstances the position remains as set out above that without the ability to access the site and provide for a legal road, I remain unable to support the proposals for the reasons given.
76. As a final point in terms of the proposed one-way arrangement. Firstly, the scheme plan at Appendix 4 of the submitters evidence still shows a legal road past 25 Sretlaw Place. Therefore, the comments above still apply. Regarding whether then the one-way element would meet the Code of Subdivision standards for adoption, the answer is no, albeit there is no apparent need for this arrangement as Lot 14 could be accessed from the existing ROW and with a small reduction in Lot sizes Lots 15 & 16 could be fed by a ROW between Lots 12 & 13.

### **RS153 & RS204 - Chain Hills Road / Irwin Logan Drive area, Mosgiel**

#### **Submitter Evidence**

77. Detailed transport evidence provided from Grant Fisher. The report details the operational characteristics of the various roads in question, Gladstone Road North, Irwin Logan Drive Chain Hills Road and Morris Road. The report then looks at the crash history for each of the roads. The next section of the report goes on to deal with traffic generation and distribution issues noting that it is considered that a proportion of the existing and consented residential lots would primarily use the proposed link road to Chain Hills Road for access rather than using the Irwin Logan Drive to Gladstone Road North route which they currently do. Conversely a proportion of the new sites will use Irwin Logan Drive to Gladstone Road North as their primary route for access. The likely spatial split is shown in Figure 14. The likely increases in peak hour traffic on the various roads in the network are then detailed in paragraph 25.
78. The next section of the report deals with the External Rooding Network and the likely impacts of the proposed development in terms of increased traffic flows and improvements required in particular as they relate to the current level of provision, some minor upgrades required to rooding widths and provision of additional walking connections. In terms of Morris Road, it is acknowledged that improvements may be required in the longer term in order to better provide for active transport modes. However, these upgrades are not seen as being impediments to the site being rezoned.
79. The internal transport network implications are assessed. Internal connectivity is generally considered to be good, with the proposed link road in particular providing for a greater level of resilience for the overall network by providing for direct access through the site.
80. The report concludes by setting out that the proposed rezoning area is considered to be reasonably well located for residential development from a road safety and efficiency perspective. Whilst noting that an assessment of likely traffic generation levels associated with the proposed rezoning indicates a significant increase in traffic using Chain Hills Road and a slight decrease in traffic using Gladstone Road North, that overall traffic from the development of the proposed plan change area would be dispersed across the network. Therefore, vehicular traffic generated by the development is expected to be able to be

accommodated by the existing transport network, with proposed upgrades to Chain Hills Road for active road users also being appropriate.

### **Transport Position**

81. The additional information now provided is helpful in more clearly understanding the likely traffic impacts of the proposal. It is also noted that in terms of the current scale of development in this general area that the number of new lots proposed is not significant in overall terms.
82. Furthermore, the likely additional traffic generated, whilst noticeable, is unlikely to result in a 'step change' increase compared with the existing relatively high flows on the surrounding roads. Whilst issues of potential 'rat running' were highlighted in the original DCC Transport evidence, this view was predicated on the majority of traffic travelling to Dunedin, which may not in fact be the case.
83. There are a number of details would still need to be worked through. In particular, but not exclusively, these relate to the upgrades and improvements required to Chain Hills Road also having regard to the safety aspects of accessing and egressing existing properties on Chain Hills Road. Subject then to a full ITA which could be provided at the subdivision stage, and the necessary upgrades being able to be delivered, there are not considered to be any overriding transport objections to this proposal (also noting that for reasons other than transport, only part of the area may now be supported for rezoning).

### **RS154 - 91 and 103 Formby Street, Outram and RS175 – 85 Formby Street, Outram**

### **Submitter Evidence**

84. Evidence of Emma Peters references a Structure Plan that has been prepared that covers both the RS154 and the RS175 sites, this is included as Appendix 1 to her evidence. The conclusions of Mr Andy Carr's transportation report are also summarised.
85. Ms Peters' advises in paragraph 28 that any transport infrastructure upgrades would be paid for by the developer who would then vest the infrastructure in Council. In paragraph 29, Ms Peters notes that the development of RS154 & RS175 would not have an adverse impact on the multi modal transport network.
86. Additional transport evidence of Andy Carr received 17/08/22.

### **Transport Position**

87. Submitters addressed the hearing 25/08/22. Andy Carr talked through matters of detail including access to the Recreation ground and possible conflicts in that regard (albeit that these concerns could be addressed). He also went on to advise that footpath / shared cycleway improvements could be provided as part of a future subdivision application. In my view, if the site were to be rezoned, then these issues could be dealt with at the subdivision stage.
88. The Chairman of the Panel asked if the work that he (Andy Carr) had done to date was in his view sufficient to meet the ITA requirements, should the site be rezoned. He advised that this



would cover the majority of the issues that would need to be addressed as part of an ITA to support a future subdivision application. This is a position with which I would agree.

89. In terms of traffic flows the increase in the number of vehicles associated with 130 additional dwellings, this would not have any noticeable effect on the wider transport network in his view, and this is also a position with which I agree.

90. All of that said I remain of the view as originally set out that, having regard to the lack of sustainability of the site, that DCC Transport are not supportive of either of these proposed sites.

### **RS157–90 Blackhead Road and surrounds specifically 70 Green Island Bush Road**

#### **Transport Position**

91. The Panel requested DCC Transport comment on the likely impact of the development should the rezoning proceed. Having regard to the level of development proposed, it is not considered that either individually or cumulatively that the provision of up to 10 new dwellings in this area would have any significant effects on either the local or the wider transport network, noting that a new roundabout has recently been provided at the Blackhead Road / Green Island Bush Road junction. Any localised improvements required could be satisfactorily dealt with at the subdivision stage. Therefore, no overriding transport objections to the sites rezoning.

### **RS 161 - 220 Signal Hill Road**

#### **Transport Position**

92. No new transport issues raised in the presentations to the hearing, therefore no changes to previously advised position. Subject to an ITA being provided at the subdivision stage the rezoning could be supported.

### **RS169 – 41 Emerson Street, Concord and GF07 – 33 Emerson Street, Concord**

93. Sites are immediately adjacent to one another and can effectively be considered together. The below comments therefore apply equally between both RS169 and GF07.

#### **Submitter Evidence**

94. Evidence provided by Paterson Pitts which supports the ability of the site to be provided with the necessary frontage upgrades in terms of providing for footpath facilities and street lighting etc. Possible footpath connection, see photo 1, from 28 Emerson Street and any necessary junction improvements to be considered as part of a future Resource Consent application. Costs of likely works are not considered to be prohibitive to future development viability.

#### **Transport Position**

95. The additional information provided goes some way to addressing the previously identified transport issues. Subject to appropriate controls / more details being provided (in particular

with regard to the likely required upgrades to Emerson Street) at the subdivision stage / via an ITA, this site could now be accepted for rezoning from a DCC Transport perspective.

96. The submitters agent addressed the Panel in support of the development 17/08/22. As noted above, in view of the evidence provided and also the details presented to the Panel, this site could now be accepted from a DCC Transport point of view, subject to an ITA being provided at the subdivision stage.

### **RS170 103 - 107 Hall Road, Sawyers Bay**

#### **Transport Position**

97. No change to previous advice – proposal could be supported subject to an ITA as part of a future subdivision application.
98. Further submitter spoke 24/08/22, main concerns relate to surface water run-off, albeit they did note that the bridge referred to in the S42A report was not the one that they had referenced in their submissions. That said the original DCC Transport position still remains i.e., no overarching issues.
99. In summary, no new transport issues raised in the presentations to the hearing which affect the previously advised position.

### **RS171 - 3 Brick Hill Road and 18 Noyna Road, Sawyers Bay**

#### **Submitter Evidence**

100. Evidence received from Darryl Sycamore (Terramark) - a concept plan showing the proposed development is included as Appendix 1 to the evidence. Notes the submitters also own the adjoining land at 105, 109 and 117 Stevenson Avenue, and that they have recently secured Resource Consent to subdivide this land into 19 sites.
101. Mr Sycamore notes DCC Transport's concerns regarding access via Noyna Road, and as a result the development has been designed with access via Brick Hill Road, similar to the development at 105 Stevenson Avenue. Notes and agrees with the need for footpath improvements, but considers this can be dealt with at the time of subdivision. Also notes the requirement for an ITA and comments that, due to time constraints, has not been able to secure a transport planner to undertake this work (Although it should be noted now that late Transport evidence was provided by the submitter on 20 August). Considers that due to a number of uncertainties the site could be rezoned but subject to an NDMA overlay.
102. Late transport evidence provided on behalf of the submitter from Logan Copland (now working for Abley) consisting of a high-level overview. Notes that the concept plan shows up to 39 sites with access via Brick Hill Road. Regarding the bridge, three options are set out in terms of dealing with this issue. Option 2 is deemed to be the preferred option which would be to retain the bridge at its current width, retain the two-lane two-way operation, and construct a separate pedestrian facility. Section 5 of the evidence considers that the site is suitable for residential development from a transport perspective, however that a number of improvements will be required. In the circumstances, it is considered that an RTZ overlay, as currently proposed by the submitter, will provide an appropriate mechanism to ensure that

agreement is reached between the developer and the Council for the delivery of the required transport infrastructure upgrades.

### **Transport Position**

103. The applicant in their evidence notes the transport concerns, and feels that these could be largely dealt with at the time of subdivision. Note that the concept plan does not show any direct access onto Noyna Road.
104. Therefore, the previous position remains - no overarching concerns from a transport perspective, but a number of detailed issues that would need to be resolved. An ITA would therefore be required to address these matters. This could be considered as part of a future subdivision application.
105. Late high level transport evidence report received which sets out (as noted above) that there are no overriding transport issues. However, considers that these can best be addressed through the application of an RTZ to the site.
106. This is an acceptable approach, noting that previous advice was that a number of improvements would be required but that these could be dealt with via an ITA at the subdivision stage. In this respect and notwithstanding the submitters recommended transport option regarding the bridge, the specific details would need to be considered as part of a future decision regarding the uplift of the RTZ.

### **RS176 - 234/290 Malvern Street, Leith Valley**

### **Transport Position**

107. No new transport issues raised in the presentations to the hearing 28/08/22 PM, therefore no changes to previously advised position. No overriding transport issues

### **RS193 177 - Tomahawk Road, Andersons Bay**

### **Submitter Evidence**

108. Evidence received from Paterson Pitts. Proposal for 4.32ha, just over half of the site, to be rezoned to GR1 with the remainder of some 3.55ha to be rezoned to Recreation Zone.
109. Notes that whilst no expert evidence is being supplied in respect to transportation matters, various comments are made in relation to the DCC Transport comments in the S42A report. They note that Gloucester Street is relatively narrow and that the intersection with Spencer Street / Gloucester Street has unusual geometry. Taking the concerns regarding the use of this access for a large number of dwellings on board, the submitter has developed a Structure Plan which seeks to limit the number of accesses from Gloucester Street to 8. Currently noting that there are 12 sites with access to Gloucester Street this would result in a total of 20, which would comply with DCC policy that no more than 20 sites should be accessed from a dead-end street.
110. The balance of the development would be accessed from Tomahawk Road, at the southern end of the property with the existing accessway at this location being upgraded and

improvements provided to resolve the sight line issues onto Tomahawk Road. Whilst the S42A report suggests the site could accommodate up to 134 dwellings, the proposed structure plan envisages a maximum of approximately 35 dwellings. Submitter agrees with Council that Gloucester Street intersection will require a review and considers that any works necessary here could be dealt with as part of a future subdivision application. Notes that a footpath could be constructed along the eastern side of Gloucester Street and, if necessary, an appropriate piece of land could be vested accordingly. If on street parking was seen to be an issue any new sites could be required to be provided with on-site parking.

111. The remaining 27 sites will be accessed from Tomahawk Road. Whilst noting this exceeds the 20 from a dead-end cul-de-sac (see note re this standard above) they consider this difference to be minimal and also note that it is unlikely that Tomahawk Road would ever need to be extended. With an improved intersection they consider the effects of these additional units would be less than minor.

112. They also reference sight distance issues, stating they consider that these can largely be achieved albeit noting the effect on these of the bridge abutment which would need to be considered further. They go on to agree with DCC that an ITA should be undertaken by the developer to assess these matters. Overall having regard to the likely number of units proposed they consider there are relatively straightforward traffic engineering solutions available to address these issues satisfactorily.

#### **Transport Position**

113. No change to previous advice – no overriding transport issues.

#### **RS195 – 774 Allanton – Waiholo Road, Allanton**

#### **Submitter Evidence**

114. Received on 17/08/22. Site is 55 ha in size and the proposed structure plan suggests a yield of up to 250 lots. Access would be directly onto SH1 and would need agreement from Waka Kotahi.

#### **Transport Position**

115. The site is in an unsustainable location. Despite the submitters suggestion of being able to provide rail access to the site, no detailed proposals are provided in this respect. These matters that would need significant discussions with, and agreement from, Kiwi Rail. Whilst a theoretical access arrangement is shown, for this level of development it is likely that a roundabout access would be required rather than slip lanes. As noted above the access arrangements would require discussion with and agreement from Waka Kotahi. For all of these reasons, DCC Transport are not in a position to support these proposals.

116. In respect of the potential access arrangements, the submitters confirmed at the hearing that there had yet to be any direct discussions / consultation with Waka Kotahi, and that this would be a matter for consideration at the subdivision stage. At the hearing it was noted by the Chair that Waka Kotahi have concerns regarding the proposed direct access to SH1. Emma Peters agreed to provide further advice from Grant Fisher in this regard.

117. Whilst noting these points the previous comments regarding matters of detail and, rather more significantly, the unsustainable nature of the location remain. Therefore, DCC Transport are not in a position to support this proposal.

## **RS200 – 489 East Taieri – Allanton Road, Allanton**

### **Submitter Evidence**

118. Evidence received from Emma Peters. In paragraph 24, Ms Peters' suggests access from the north will be from SH1 via a one-way slip lane. And from the south will be via Ralston Street to the existing formed intersection at Grey Street. The design standards are briefly assessed in Appendix 4. A performance standard could be attached to a structure plan mapped area requiring an ITA prior to subdivision. As noted by Emma Peters, there are two lanes heading north on SH1, opposite part of the site. Note Grant Fishers general transport comments also, regarding the possible entrance design details.

### **Transport Position**

119. The additional access details as they relate to the State Highway would need consideration / agreement with Waka Kotahi. In terms of detailed considerations, there may be a need to widen Ralston Street. These points notwithstanding, the overarching concerns regarding the unsustainable location remain.
120. In respect of the potential access arrangements, the submitters confirmed at the hearing that there had yet to be any direct discussions / consultation with Waka Kotahi, and that this would be a matter for consideration at the subdivision stage. At the hearing it was noted by the Chair that Waka Kotahi have concerns regarding the proposed direct access to SH1. Emma Peters agreed to provide further advice from Grant Fisher in this regard.
121. Whilst noting these points the previous comments regarding matters of detail and, rather more significantly, the unsustainable nature of the location remain. Therefore, DCC Transport are not in a position to support this proposal.

## **RS205 761 Aramoana Road, Aramoana**

### **Transport Position**

122. No new transport issues raised in the presentations to the hearing, therefore no changes to previously advised position.

## **RS77, RS206, RS206a, - Part 35- & 43-Watts Road, Part 109 North Road**

### **Submitter Evidence**

123. Evidence from Mr Conrad Anderson. Notes in paragraph 47 (f) when referencing local transport effects that the residential area adjacent to Watts Road was recently granted a resource consent (SUB 2019 – 138) for a 14-lot subdivision. Subject to conditions of consent, Mr Anderson notes that the expert traffic advice that Council received in relation to that development was that matters of access and traffic generation were acceptable. Mr Anderson

considers that any local traffic matters that arise from the proposed rezoning could be adequately managed via the 2GP.

124. Evidence received from Mr Kurt Bowen. Mr Bowen notes the S42A report raises questions over the ability of Watts Road to support the increased level of traffic that might be anticipated from rezoning. Specifically noting that these questions relate to carriageway and footpath widths, the width of the legal road corridor, and the impact of the increase in traffic on the Watts Road / North Road intersection.

125. Mr Bowen outlined the proposed improvements and, in summary, considers that the transportation costs involved are not insignificant but having regard to the number of dwellings proposed, are feasible to be delivered.

#### **Transport Position**

126. The additional information provided by the submitter is helpful in seeking to demonstrate that there are potential solutions to the identified transport issues. These will come at a cost, and will need to be resolved as part of the site design process. That said, it is my view that an ITA should be provided prior to rezoning,. This will need to demonstrate the ability to provide for the second bridge / additional site access, and the mechanism for these infrastructure improvements being delivered at the subdivision stage

### **RS212 170 Riccarton Road West**

#### **Transport Position**

127. Transport comments not previously sought, At the hearing on 23/08/22, the Panel asked a question regarding the transport effects of rezoning this site in terms of effects on Riccarton Road and the surrounding transport network, should the rezoning proceed.

128. An additional 140 dwellings (should GR1 zoning be considered appropriate) would be a not insignificant amount of new development. Both the localised and potentially wider transport impacts would need to be considered as part of an ITA (which could be provided at the subdivision stage). In particular, an assessment of the Riccarton Road / Bush Road intersection would be required as part of the ITA, and any necessary future improvements identified accordingly. That said, the main issue is if the zoning of this land would give rise to pressure for the zoning of additional areas. This is particularly the case noting that the plans in Appendix 1 of the submitters evidence show the opportunity for providing roading connections to adjoining land. In which case the cumulative impact of additional residential development would need to be considered holistically.

129. Overall there no overriding transport issues to the rezoning of this specific area of land, however, there may be more significant issues if larger areas of land were then accepted for rezoning on the basis of the zoning of this land.