



4 August 2022

The Variation 2 Officer  
Dunedin City Council  
PO Box 5045  
Dunedin

**RESPONSE TO VARIATION 2 s42A REPORT**  
**RS157: 70 GREEN ISLAND BUSH ROAD**  
**SUBMITTER: BARRY DOUGLAS ARMOUR, FIONA LYNN ARMOUR**

Attached:

- Development Plan

Please find below, the submitter's response to the s42A recommendations that relate to this greenfields site.

**Background**

This is a 2.4139ha property that is currently zoned Rural Residential 1. It contains a single dwelling and scattering of non-residential buildings. The balance of the property is open pasture, with a shelter belt that occupies the majority of the periphery of the site. The property is accessed via a 10m wide access strip.

The property is not readily visible from the road. It is well cared for, but the submitter feels that current zoning doesn't allow for an efficient utilisation of the property.

The existing GR1 zone is located at a distance of 260m from the western edge of the Emerson Street Cemetery. Given time, it is foreseeable that the land in the region to the west of the cemetery may experience a higher density of residential development, as the urban extent of the City expands outwards.

Rezoning the property to Large Lot Residential 2 will allow development that is at a scale both sustainable in respect of local infrastructure, and sensible in terms of providing a graduated west-to-east transition between the Rural Residential Zone and nearby GR1 zone. In this respect, we view this site as being a forerunner for future residential rezoning of the broader environment at this location.

**Transportation Matters**

While no expert evidence is being supplied by the submitter in respect to transportation matters, the submitter considers the information below to be relevant.

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No specific commentary has been provided by DCC Transport within the s42a report. Green Island Bush Road is a local road, despite being constructed to a reasonably high standard. The site is adjacent to a corner with a 25kph advisory speed, meaning that the site entrance is particularly easy to enter and exit due to the relatively low speed of all vehicles. Excellent sight lines are available in both directions (the access is located on the outside of the road curve rather than the inside curve). The number of vehicle movements that result from five additional building platforms within the site, as indicated on the attached Development Plan, are not expected to create any adverse effects on the roading network that are more than minor.

There appear to be very few matters to resolve from a transport perspective for this site. The land is situated on a road that is constructed to a high standard but appears to be under-utilised. The entrance to the proposed development is well suited to the purpose, with good visibility available in both directions.

### **Landscape Matters**

We have been unable to locate any Variation 2 reporting relating to landscape and biodiversity for this site. The s32 report appears silent with regard to landscape. The property has extensive boundary plantings and is situated in a visually recessive location, which reduces the degree to which the property is visible from public vantage points. Further plantings can be undertaken for landscape mitigation should they be deemed necessary for mitigation.

### **3-Waters Matters**

While no expert evidence is being supplied by the submitter in respect to 3-waters matters, the submitter considers the information below to be relevant.

As with the landscape considerations, we have been unable to locate any specific 3-waters reporting on the site. The s42a reporting states that 'While Large Lot Residential density can be self-serviced for 3-waters, if some level of servicing was expected at this location, given the sites disconnect with existing serviced areas, rezoning the site would result in inefficient and ineffective public infrastructure through needing to extend servicing significantly to reach the site'. The submitter agrees that on-site servicing provisions are appropriate for this locality. Mechanisms are available to Council, such as consent notices placed on new subdivision titles, that can be used to make it abundantly clear to purchasers that Council has no program in place for extension of reticulated services to this neighbourhood.

Concern about the need for major upstream or downstream 3-waters infrastructure investment is broadly reported at many locations across the City, as assessed in the s42a report. However, given that sites created at this location will be entirely self-serviced for 3-waters infrastructure (i.e. roof collection for potable water, septic tank discharge for wastewater, and discharge to ground for stormwater), there is no basis for concern over external elements of the 3-waters reticulated network. Should stormwater management be required to control flows that pass across the site boundaries, this could be easily achieved through the installation of on-site detention tanks.

Essentially, this proposal allows the city to make a small but useful gain in terms of residential capacity whilst attracting precisely zero extra demand on Council's infrastructure network, and requiring no ratepayer investment whatsoever.

### **Hazards Matters**

No specific geotechnical reporting has been provided with the s42a reporting for this site. No hazards are recorded on the 2GP planning maps, either on or surrounding the subject property. The property contains reasonably easy gradients and is free draining, therefore we have no reason to suspect that it is subject to any natural hazards.

### **Structure Plan**

A Development Plan is attached (this is not quite a Structure Plan).

### **Planning Matters**

It appears that Council's s42a assessment has been based on larger yields than those allowed by the proposed Large Lot Residential 2 zoning. The submitter feels that the site is best suited to a Large Lot Residential 2 zoning format, allowing for a minimum site size of 3,500m<sup>2</sup>. Under this arrangement, the maximum yield of the land is 6 sites. The attached Development Plan shows a practical subdivision layout, which results in 5 sites.

We consider that rezoning the property to Large Lot Residential 2 will allow development that is at a scale both sustainable in respect of local infrastructure, and sensible in terms of providing a graduated west-to-east transition between the Rural Residential Zone and nearby GR1 zone. In this respect, we view this site as being a forerunner for future residential rezoning of the broader environment at this location.

There is a recurring theme in the reporting that this location is disconnected from the rest of the city. The central city is 15 minutes away, southern motorway is 5 minutes away and Green Island township is 8 minutes away via 3 alternative routes. These distances are shorter than they are from a number of urban centres in the city. Whilst the site does not lie immediately adjacent to dense urban development, it certainly isn't distant or disconnected from the City and its attractions and activities.

Existing landscaping on the periphery of the site means that development on the site is able to be largely screened. The applicant is agreeable to undertaking further work in this regard should that assist the rezoning process. The transport network appears to be able to accommodate the increased demand, and the entrance location for this development is favourable. A good score in terms of future carbon emissions has been determined. An excellent outcome is achievable in terms of 3-waters infrastructure.

Having carefully considered the Council's evidence and the S42a recommending report, we continue to believe that rezoning the property to Large Lot Residential 2 is appropriate.

Yours faithfully

**PATERSON PITTS GROUP**

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a horizontal stroke that tapers to the right.

**Kurt Bowen**

Registered Professional Surveyor