



4 August 2022

The Variation 2 Officer  
Dunedin City Council  
PO Box 5045  
Dunedin

**RESPONSE TO VARIATION 2 s42A REPORT**  
**RS 157: 90 BLACKHEAD ROAD**  
**SUBMITTER: CRAIG JAMES DUNCAN, KIRSTEN JANE DUNCAN**

Attached:

- Development Plan

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

**Background**

This is a 2.19ha property that is currently zoned Rural Residential 1. It contains a single dwelling and a non-residential building. The balance of the property is open pasture with a shelter belt screening it visually from most vantage points.

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.

No specific commentary has been provided by DCC Transport within the s42a report. Blackhead Road is a Collector Road at this locality, and judging by the standard of the formation and the apparent vehicle movements, there would seem to be a fair amount of capacity for this road to service additional sites. Access to the property will utilise the existing vehicle entrance, which provides satisfactory sight lines in either direction. The number of vehicle movements that result from four additional building platforms within the

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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.

The bus terminus in Middleton Road is 1.2km from the site; a practical and pleasant 15 minute walk or a short cycle trip. Furthermore, the site scores reasonably well on the 'commute related carbon emissions table'; this property was awarded a 2 (additional carbon emissions per person per day), which is more favourable than the average result for the greenfields sites that have been assessed (2.375).

There appear to be very few matters to resolve from a transport perspective for this site. The site is closer than it might appear on first look to the existing urban area and the central city. Public transport is a very feasible option. Blackhead Road itself appears to be of a suitable standard to satisfactorily manage the small additional loading that would result from this rezoning being enabled. Finally, 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, which reduces the opportunity for adverse visual amenity effects. 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 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.

Existing landscaping on the periphery of the site means that development on the site is able to be largely screened. The submitter 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 reliable bus service is located close by, and 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**



**Kurt Bowen**

Registered Professional Surveyor