

**Before a Panel Appointed by the
Dunedin City Council**

In the Matter of the Resource Management Act 1991 (**RMA**)

And

In the Matter of Proposed Variation 2 of the Second Generation
Dunedin District Plan – Appeals Version (**2GP**)

**Brief of Evidence of Emma Rayner Peters
on behalf of Mr Grant Motion**

(Submission 241 – GF11)

Dated 5th August 2022

Background:

1. My name is Emma Rayner Peters. I hold a BA and LLB both from the University of Otago and a First Class Honours degree and MA with Distinction, both from the University of Canterbury. I have worked as a solicitor in the areas of commercial and environmental law. I have been the principal of Sweep Consultancy Limited since 2003 providing resource management advice predominantly in the Dunedin City, Clutha, Waitaki, Queenstown Lakes and Central Otago districts.
2. I have prepared this evidence based upon my investigations and knowledge of the submission, further submissions and Variation 2 of the Dunedin City Second Generation District Plan Appeals Version including Council's s32 report, s42a report and evidence from Council staff.
3. I acknowledge we are not before the Environment Court. However, I have read the Code of Conduct for Expert Witnesses within the Environment Court Consolidated Practice Note 2014 and I agree to comply with that Code. This evidence is within my area of expertise, except where I state that I am relying on the evidence of another person. To the best of my knowledge, I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed in this evidence.

Notification of Variation 2

4. GF11 was notified as rezoning land located in various properties along Wakari Road being rezoned from *Rural Residential 2* to *General Residential 1* – see Figure 1a below.
5. GF11 contains approximately 23 hectares and ten properties in different ownership as shown in Figure 1b below.

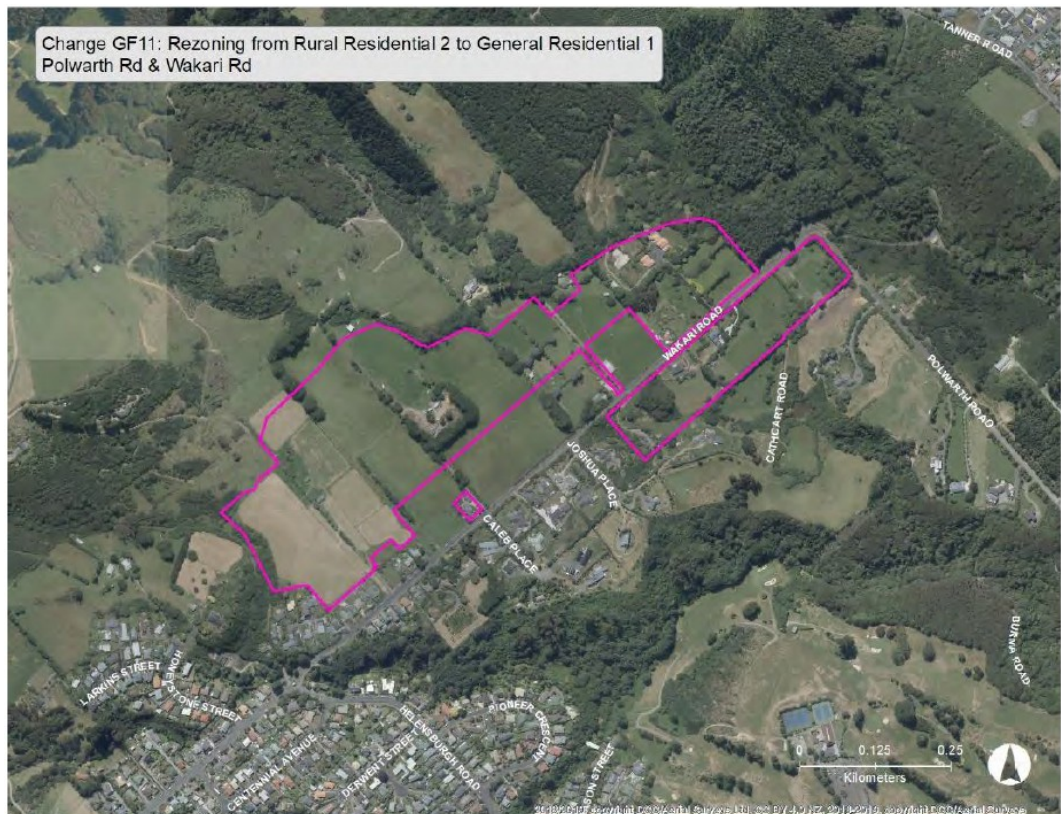


Figure 1a: Extent of GF11¹.

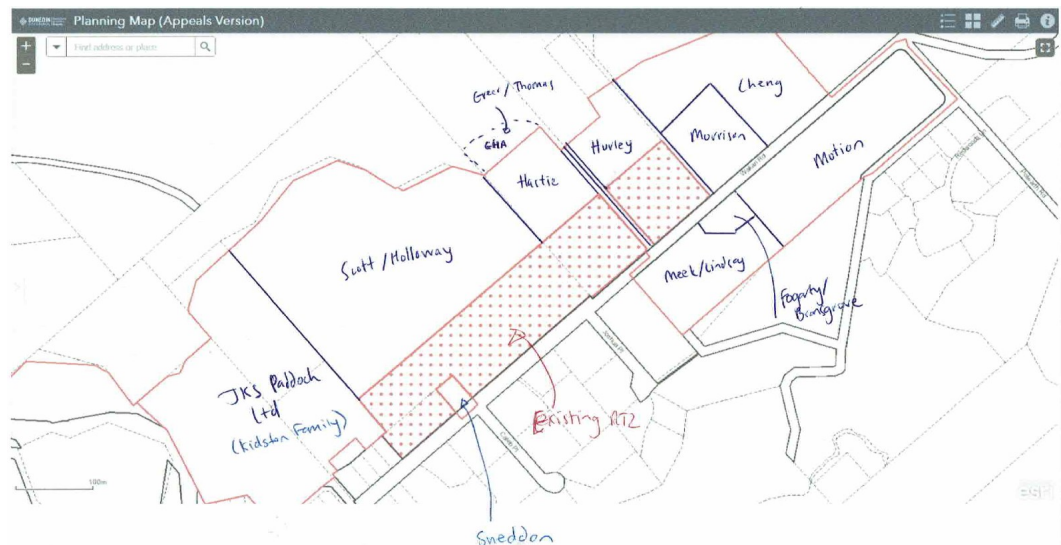


Figure 1b: Property Ownership within GF11.

Submission 241 from Mr Grant Motion:

6. A submission was made on behalf of Mr Grant Motion to support Change GF11². Mr Motion owns a property at 312 Wakari Road which falls within GF11. Mr Motion's property contains approximately 1.8ha.

Other and Further Submissions:

7. A number of other submissions and further submissions were made on GF11.

¹ Source: Appendix 6.10 to s32 Report.

² Original submission 241.

These are detailed at 5.2.13 of the s42a report and are well discussed within the s42a report.

s32 Report and s42a Report:

8. Council conducted an assessment of GF11 against its rezoning site criteria table for both the s32a report and the s42a report. The rezoning site criteria table³ is based on the site rezoning criteria set out in Policies 2.6.2.1⁴ and 2.6.2.3; the latter only being applicable to medium density which is not proposed for GF11. Both assessments found that GF11 rates highly for rezoning as residential. Copy of the assessments conducted pursuant to both the s32 report and the s42a report are appended at Appendices 2a and 2b respectively.
9. The difference between the s32 and s42a assessments is in relation to transport effects, both local and wider network, and the requirement for upgrades therein.
10. The s32 report summaries the notified changes in relation to GF11 as: *“The following amendments to the 2GP maps are proposed in relation to this site: a. Rezoning from Rural Residential 2 to General Residential 1. b. Application of a 'new development mapped area'. c. As a consequential change, the 'high class soils mapped area' is removed from the site, as rules relating to this mapped area only apply in rural and rural residential zones.”*
11. At page 135 of the s42a report, the reporting planner details their recommendation on rezoning GF11 stating: *“While I consider rezoning GF11 broadly appropriate, there is an issue in that a number of upgrades will be required to infrastructure and there is currently limited provision to recoup these costs through development contributions, particularly for transport works. Where a rezoning site is owned by one or a small number of landowners, upgrades can be required to be completed by the developers as part of the subdivision process. This is not straightforward where multiple landowners are involved and parts of the area will be developed at different times. With this in mind, I am unwilling to recommend rezoning the site to residential at this time, without processes in place to ensure that appropriate funding mechanisms are in place. I therefore recommend that, rather than directly rezoning to residential, a Residential Transition Overlay Zone (RTZ) is applied to GF11. This RTZ would have a site-specific rule governing release of the land for residential development,*

³ See Appendix 5 of the s32 Report.

⁴ Copy of Policy 2.6.2.1 is appended at Appendix 1.

rather than the standard criteria specified in Rule 12.3.1 of the 2GP. Release of the RTZ would be subject to one of the following:

1. *A cost sharing agreement is in place between all landowners within the RTZ area and DCC (where appropriate), that would cover:*
 - a. *preparing an Integrated Transportation Assessment (ITA),*
 - b. *undertaking the necessary transportation upgrades,*
 - c. *providing an appropriate recreational reserve; or*
2. *The required upgrades are included in the DCC's 10 year plan, and funding for these upgrades is able to be recovered via development contributions.*

As I am recommending two different zonings within GF11 (General Residential 1 and Large Lot Residential 1), each area would require its own RTZ Overlay Zone (Wakari 2 and Wakari 3). However, the cost sharing agreement would need to encompass both RTZ areas. I also note that there is an existing RTZ (Wakari) adjacent to the areas to be rezoned. While ideally, this area would be included in any cost sharing agreement, there is no scope to require that through Variation 2.

RTZ are normally applied to sites where infrastructure is not planned within the medium term. Significant infrastructure upgrades are anticipated to be required to service the level of development that this rezoning would provide for. I am recommending an RTZ is applied here specifically for the purpose of ensuring that appropriate cost sharing agreements are in place, or funding is included in the DCC's 10 year plan, before subdivision occurs. This is particularly important as the site is owned by multiple owners, making developer-led upgrades more complex."

12. The various RTZ areas promoted by the reporting planner are shown in Figure 2 below.



Figure 2: Recommended RTZ for GF11⁵.

13. Mr Motion's property at 312 Wakari Road is located within 'Wakari Road 2 RTZ (GR1)' as shown in Figure 2 above.

14. The reporting planner also recommended applying a structure plan to GF11⁶.

312 Wakari Road – Structure Plan

15. Mr Motion's property has a major constraint on lot yeild being the *National Grid Subdivision Corridor Mapped Area*. There are also two scheduled trees. The extent of the mapped area on 312 Wakari Road and the location of the scheduled trees are shown in Figure 3 below.

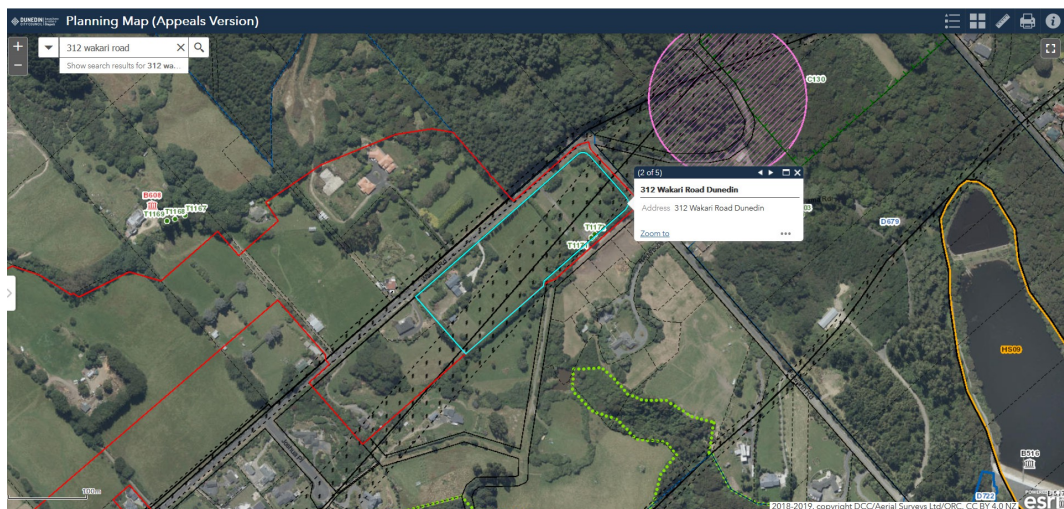


Figure 3: Extent of National Grid Subdivision Corridor Mapped Area & Location of Scheduled Trees.

⁵ Source: s42a Report, page 141.

⁶ See s42a report, page 142.

16. Mr Motion engaged Terramark to produce a structure plan for 312 Wakari Road. The structure plan is shown in Figure 4 below and a copy is also appended at Appendix 3.



Figure 4: Structure Plan for 312 Wakari Road.

17. The orange hatched area is a 'no build' area relating to the *National Grid Subdivision Corridor Mapped Area* and, hence, the majority of the land within 312 Wakari Road would remain in Lot 4.
18. Lot 13 is proposed to vest in Council for use to house future 3 waters pumping infrastructure.
19. Lots 11 and 12 will be accessed via Polwarth Road, Lot 12 via right of way, with Lots 4 – 10 having access directly from Wakari Road whilst Lots 1 -3 will also gain access from Wakari Road, Lots 2 and 3 via right of way.
20. Lots 1, 2, 5, 6 and potentially 7 have sufficient land outside of the 'no build' area and are suitable from a contour perspective to provide for two dwellings (either by way of further subdivision or duplex).

Is there a Need for an RTZ Over 312 Wakari Road?

21. The reporting planner states that a *Residential Transition Overlay Zone* is required in order to achieve cost sharing agreements between landowners within GF11 for infrastructure upgrades. This is tested below with respect to 3 waters infrastructure and transport upgrades.

3 Waters Infrastructure Upgrades

22. The site assessments of GF11, both pursuant to s32 and to s42a, state that issues in relation to potable water supply and wastewater supply are 'manageable' both stating:

Potable water supply	Some issues (manageable)	Some local upstream network upgrades required. The 10 year plan includes funding for all costs associated with extending 3 Waters servicing to new sites, where this is necessary or desired. The 10 year plan also includes the majority of funding required for existing network upgrades across the city, however the exact upgrades funded aren't yet confirmed.
Wastewater supply	Some issues (manageable)	Localised downstream upgrade is required for part of site. The 10 year plan includes funding for all costs associated with extending 3 Waters servicing to new sites, where this is necessary or desired. The 10 year plan also includes the majority of funding required for existing network upgrades across the city, however the exact upgrades funded aren't yet confirmed.

23. Mr Motion has had discussions with 3 Waters and has been informed that there is sufficient capacity within the existing potable water and wastewater infrastructure to service development of his property – this aligns with the above assessments and is particularly so given the relatively low yield from 312 Wakari Road due to the 'no build' area in relation to the *National Grid Subdivision Corridor Mapped Area*.
24. With respect to stormwater, the performance standards relating to new development mapped areas and subdivision require that a stormwater management plan is prepared for 312 Wakari Road prior to subdivision. It is anticipated that a performance standard attaching to the structure plan for 312 Wakari Road would also include this requirement. There is sufficient space within Lot 4 for onsite attenuation of stormwater, prior to discharge to existing stormwater drainage, resulting from any future subdivision of 312 Wakari Road pursuant to the structure plan. The precise details of stormwater management can be left to the time of subdivision. Simply put, there will be a number of feasible methods for subdivision of 312 Wakari Road pursuant to the structure plan to achieve the primary principle of stormwater management being that post development flows from a site are equal to or less than pre-development flows so that there is no adverse effects downstream of the development site.
25. 312, 296 and 280 Wakari Road are physically separated from the balance of GF11 by Wakari Road and there will not be any 'shared' stormwater infrastructure between the two sides of the road excepting existing stormwater drainage.

26. Likewise, there will be no 'shared' stormwater infrastructure between 312 and 296 & 280 Wakari Road due to topography and contour as can be seen in Figure 5 below.
27. Any future subdivision of 296 and 280 Wakari Road will not involve attenuation for that development within 312 Wakari Road. In any case subdivision of 296 Wakari Road is unlikely given the location of the existing, large, modern home within this property. Yield constraints also apply to 280 Wakari Road because of the 'no build' area that will result from the *National Grid Subdivision Corridor Mapped Area*, topography (gully) and existing vegetation.



Figure 5: Contour within GF11.

28. There is no justification for the application of a *Residential Transition Overlay Zone* to 312 Wakari Road with respect to the need for owners to come to agreement on cost sharing for the upgrade of 3 Waters infrastructure. This would also be true of 296 and 280 Wakari Road and potentially the balance of GF11.

Transport Infrastructure Upgrades

29. The site assessments of GF11 for both the s32a report and the s42a report state:

Transport effects (local)	Significant issues (manageable)	Consideration of connectivity will be required at subdivision stage. An upgrade of Wakari Road would be required in relation to formation standards, speed management treatments and safety upgrades for active modes.
Transport effects (wider network)	Significant issues (manageable)	A Local Area Traffic Management (LATM) study would be needed. There are current 'rat running' issues through the existing local streets to Helensburgh Road which could be compounded by additional development, prompting the requirement for speed management treatments. The Helensburgh Road/Taieri Road intersection and the Wakari Road/Taieri Road intersection would need to be improved for safety and efficiency.

30. However, the s42a report includes 'updated 2022 comments' which state in relation to local transport effects: *“(Updated 2022 comments): As has been*

previously noted, Wakari Road would need to be upgraded in order to support the increased demand on the network. This upgrade is not currently planned or budgeted for. The upgrade of Wakari Road will need to include suitable provisions for pedestrians and cyclists, traffic capacity and street lighting. Currently, the formation standard of Wakari Road changes significantly at 205 Wakari Road. East of this property, the formed width of the road reduces and there is no kerb and channel or footpaths, and no space for on-road parking. There are steep banks either side of the road and there is a line of power poles which could create issues with footpath construction and/or road widening. It is possible land acquisition would be required.

With respect to the design of the internal roading network for the subdivision, it would be appropriate for a structure plan to be developed which includes minimum road design and connectivity requirements. This should include: a. A requirement to link the site with the Honeystone Street mapped area with a road for the benefit of both sites. b. A requirement to provide access to the subdivision through 245 and 297-301 Wakari Road.

Road access through 195 Wakari Road is considered beneficial from a strategic connectivity perspective but could be problematic to achieve due to the constrained width of the leg-in and location of existing driveways immediately adjacent.

DCC Transport recommend that a structure plan is put in place over the wider area to ensure the site is developed holistically.”

In relation to wider network transport effects the updated comments state: “(Updated 2022 comments): Provisions for public transport will need to be reviewed given the size of the development. Overall, it should be noted that this development will generate the need for substantial upgrades to the existing transport network, and the detail of these upgrades is not yet fully understood. More work is therefore required to identify the extent of the required upgrades and a funding plan should be developed to ensure the upgrades are delivered in a coherent, fair manner.”

31. In the vicinity of 312 Wakari Road, the roading network, Wakari Road and Poleworth Road, is classified as *Local Roads* pursuant to the *Road Classification Hierarchy*. However, both roads are likely capable of absorbing the additional traffic movements associated with development of 312 Wakari Road pursuant to

the structure plan and even 296 and 280 Wakari Road given the yield constraints of these properties.

32. There is no need to provide for 'linkages' to future residential density increases on adjoining land as, due to topography, it is more likely such residential intensification will be accessed via Polwarth Road and Cathcart Road.
33. With respect to local transport network upgrades, Mr Motion has had an on-site meeting with Transport. It was determined that there is the ability to provide space for pedestrian access and potentially street lighting along the frontage of 312 Wakari Road. Mr Motion is prepared to form pedestrian access along the frontage of 312 Wakari Road. Additional land from 312 Wakari Road can be vested as road reserve on subdivision if it is determined upon survey that there is insufficient width to provide for future upgrades of Wakari Road.
34. The subdivision process, including various performance standards, are well capable of dealing with local transport network effects at the time of subdivision. As a matter of course the transport effects of any proposed subdivision are assessed. It would be more appropriate to include a performance standard attaching to the structure plan that requires these effects to be assessed and any necessary local transport upgrades included in the subdivision.
35. The wider transport network upgrades are the responsibility of Council and it is up to Council to manage its funding to provide for these and these upgrades do not provide justification for the application of a *Residential Transitional Overlay Zone* to 312 Wakari Street or indeed the balance of GF11.

Residential Capacity

36. There is a shortage of zoned residential capacity available to the market in Dunedin.
37. The s42a report includes an update of the Housing Capacity Assessment. That assessment purports to show a supposed surplus of zoned capacity for 1,280 dwellings in the short term (2022 – 2025) and a 350 dwellings in the medium term (2022 – 2032). However, it appears that these figures do not take into account the impact of the Panel's decision that pre-1940s buildings required some level of protection and resource consent is now required to demolish buildings built prior to 1 January 1940 in the *General Residential 1* and *Township and Settlement* (with Council reticulated wastewater) zones as well as *Variation 2*

*Mapped Areas*⁷.

38. This rule will operate so that at least some of pre 1940's buildings will now have to be retained meaning that the number of dwellings resulting from infill development in these existing residential zones and mapped areas will now not be as high as originally anticipated in the Housing Capacity Assessment.
39. It became apparent during 2GP mediation that there were issues in the modelling producing the Housing Capacity Assessment data. A finer grained analysis of the land with moderate to high zoned capacity (that is, zoned capacity for 6 or more residential units) showed that there were issues with the modelled zoned capacity including things such as historic rubbish tips, slopes of more than 25 degrees, insufficient lot size on slope terrain, access, encumbrances and the like.
40. Despite repeated requests by Sweep Consultancy Limited (to Council and to the Panel) and by Property Economics (to Council) Council has not released the zoned capacity data for double checking by professionals engaged by submitters. This raises real issues of natural justice particularly if the Panel places weight on the Housing Capacity Assessment Report in any decisions not to rezone requested sites residential.
41. There is also an accepted difference between '*zoned capacity*' which is what the Housing Capacity Assessment Report assesses and '*market availability*' of that zoned capacity. Seeking a residential rezone of your land is a clear indication that such landowners intend to make the zoned capacity resulting from such a rezone available to the market.
42. In any event, the s42a reporting planner states⁸: *“Despite a projected sufficiency of supply in the short and long term, the decisions on Variation 2 to date do not enable any additional greenfield zoning. Providing for greenfield development opportunities provides choice for Dunedin's residents, in terms of type, price and location of households. Sufficient projected capacity should not be a reason not to rezone any new greenfield land. However, in my view, there is not a pressing demand for additional development capacity that could be used to justify zoning greenfield land that is not well aligned with the objectives and policies of the 2GP.”*

Conclusion

43. Mr Motion supports the rezoning of GF11 to *General Residential 1* with the

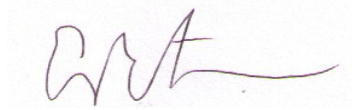
⁷ This part of the Panel's decision has been appealed by Paterson Pitts Limited Partnership – see *ENV-2022-CHC-035*.

⁸ S42a Report, paragraph 23.

application of a *New Development Mapped Area* and application of a *Structure Plan Mapped Area*. A site specific structure plan has been prepared for 312 Wakari Road. In relation to the *New Development Mapped Area*, Mr Motion requests that different NDMA's apply to each side of Wakari Road to better reflect topographical separation which will mean that sharing of infrastructure from one side to the other is highly unlikely.

44. There is no justification for the application of a *Residential Transition Overlay Zone* to 312 Wakari Road, and potentially the balance of GF11, in relation to cost sharing for 3 Waters infrastructure upgrades. Any necessary upgrades with respect to potable water supply and wastewater supply are already within the 10 year plan. There will be no need to 'share' stormwater infrastructure between 312 Wakari Road and other properties within GF11 due to water catchment topography. This is likely true for most of GF11. The requirement to provide a stormwater management plan for any site to be subdivided will ensure that there is no increase in effect on downstream sites post development.
45. Local transport network effects are likely to be capable of being dealt with on a case-by-case basis at the time of subdivision provided that any required additional width for Wakari Road reserve is obtained at time of subdivision and localised upgrades (pedestrian access, street lighting) are required as part of the s224(c) subdivision process. Council can refuse to accept for processing or decline subdivision applications which fail to adequately assess local transport effects and provide for local transport network upgrades required as a result of the residential development proposed in the subdivision application.
46. The wider transport network upgrades are the responsibility of Council and do not justify the application of a *Residential Transition Overlay Zone* to 312 Wakari Road or indeed to the balance of GF11.
47. GF11 scores highly on the site assessment criteria table and represents an ideal location for providing residential capacity for Dunedin. Dunedin is desperately short of both zoned capacity and zoned capacity that is available to the market. There are owners within GF11, Mr Motion being one, who have already produced structure plans which evidence the willingness of these property owners to make zoned residential capacity in this locale available to the market.
48. The arguments within the s42a report do not suffice to cause a delay to that release of residential zoned capacity that can become readily available to market.

Dated this 5th day of August 2022

A handwritten signature in dark ink, appearing to read 'ERT', with a long horizontal flourish extending to the right.

Emma Rayner Peters (BA (First Class Honours), MA (Distinction), LLB)

Appendix 1: Policy 2.6.2.1.

Identify areas for new residential zoning based on the following criteria:

- a) rezoning is necessary to ensure provision of at least sufficient housing capacity to meet expected demand over the short and medium term; and
- b) rezoning is unlikely to lead to pressure for unfunded public infrastructure upgrades, unless either an agreement between the infrastructure provider and the developer on the method, timing, and funding of any necessary public infrastructure provision is in place, or a Residential Transition overlay zone is applied and a future agreement is considered feasible; and
- c) the area is suitable for residential development by having all or a majority of the following characteristics:
 - i. a topography that is not too steep;
 - ii. being close to the main urban area or townships that have a shortage of capacity;
 - iii. currently serviced, or likely to be easily serviced, by frequent public transport services;
 - iv. close to centres; and
 - v. close to other existing community facilities such as schools, public green space and recreational facilities, health services, and libraries or other community centres;
- d) considering the zoning, rules, and potential level of development provided for, the zoning is the most appropriate in terms of the objectives of the Plan, in particular:
 - i. the character and visual amenity of Dunedin's rural environment is maintained or enhanced (Objective 2.4.6);
 - ii. land, facilities and infrastructure that are important for economic productivity and social well-being, which include industrial areas, major facilities, key transportation routes, network utilities and productive rural land:
 - 1. are protected from less productive competing uses or incompatible uses, including activities that may give rise to reverse sensitivity; and
 - 2. in the case of facilities and infrastructure, are able to be operated, maintained, upgraded and, where appropriate, developed efficiently and effectively (Objective 2.3.1).

Achieving this includes generally avoiding areas that are highly productive land or may create conflict with rural water resource requirements;
 - iii. Dunedin's significant indigenous biodiversity is protected or enhanced, and restored; and other indigenous biodiversity is maintained or enhanced, and restored; with all indigenous biodiversity having improved connections and improved resilience (Objective 2.2.3).

Achieving this includes generally avoiding the application of new residential zoning in ASBV and UBMA;

- iv. Dunedin's outstanding and significant natural landscapes and natural features are protected (Objective 2.4.4). Achieving this includes generally avoiding the application of new residential zoning in ONF, ONL and SNL overlay zones;
- v. the natural character of the coastal environment is, preserved or enhanced (Objective 2.4.5). Achieving this includes generally avoiding the application of new residential zoning in ONCC, HNCC and NCC overlay zones;
- vi. subdivision and development activities maintain and enhance access to coastlines, water bodies and other parts of the natural environment, including for the purposes of gathering of food and mahika kai (Objective 10.2.4);
- vii. the elements of the environment that contribute to residents' and visitors' aesthetic appreciation for and enjoyment of the city are protected or enhanced. These include:
 1. important green and other open spaces, including green breaks between coastal settlements;
 2. trees that make a significant contribution to the visual landscape and history of neighbourhoods;
 3. built heritage, including nationally recognised built heritage;
 4. important visual landscapes and vistas;
 5. the amenity and aesthetic coherence of different environments; and
 6. the compact and accessible form of Dunedin (Objective 2.4.1);
- viii. the potential risk from natural hazards, and from the potential effects of climate change on natural hazards, is no more than low, in the short to long term (Objective 11.2.1);
- ix. public infrastructure networks operate efficiently and effectively and have the least possible long term cost burden on the public (Objective 2.7.1);
- x. the multi-modal land transport network, including connections between land air and sea transport networks, operates safely and efficiently (Objective 2.7.2); and
- xi. Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion. Urban expansion only occurs if required and in the most appropriate form and locations (Objective 2.2.4).

Appendix 2a: Appendix 6.10 to s32 Report.

APPENDIX 6.10 Rezoning Assessment Sheet - Polwarth Rd and Wakari Rd (GF11)		
SITE DETAILS		
Change Number	GF11	
Area proposed for rezoning		
Site Address	307 Wakari Road, 312 Wakari Road, 280 Wakari Road, 296 Wakari Road, 245 Wakari Road (in part), 195 Wakari Road (in part), 311 Wakari Road (in part), 301 Wakari Road (in part), 265 Wakari Road (in part), 225 Wakari Road (in part)	
Full area assessed	As shown in map above. The area assessed does not include parts of sites subject to a significant natural landscape overlay zone.	
Site Area	23.3 hectares	
Current zoning	Rural Residential 2	
PROPOSAL DETAILS		
2GP Zone assessed	General Residential 1	
ASSESSMENT CRITERIA		
Slope	Some issues	The majority of the site is gently to moderately sloping, with some steeper slopes on 280 Wakari Road.

Aspect - Solar access	Ok	Generally south or east facing, and gently to moderately sloping
Accessibility – Public Transportation	Good	The nearest high frequency bus stop is approximately 500m away.
Accessibility - Centres	Ok	Helensburgh neighbourhood centre is approximately 1,000m away
Accessibility – Schools	Very good	Wakari School is the closest primary school to the site, at approximately 1.4km. away
Rural character/visual amenity	Moderate issues	The site has relatively high rural character and amenity values and this will change with general residential scale development. Parts of the area are visible from Wakari Road and in long views from the Roslyn area. Note that part of the area adjoining the Wakari Road has already been identified for future residential development (RTZ).
Impacts on productive rural land	Some issues	The majority of this area is identified as having high class soils, but there are no LUC Class 1 - 3 soils. Most sites in the area are rural residential scale, with only two being of a scale that might result in loss of primary productivity. Overall losses per new site are likely to be low - moderate.
Reverse sensitivity	No issues	
Significant indigenous biodiversity	No issues	
Natural landscapes and natural coastal character	No issues	
Access to the coast and water bodies	No issues	
Significant Trees, heritage items, important vistas or viewshafts, important green or open spaces	Some issues (manageable)	There are two scheduled trees (T1171 & T1172) along the south eastern boundary of 312 Wakari Road. Existing 2GP rules require resource consent for activities affecting scheduled trees. The trees should not affect the development potential of the area.
Natural Hazards	No issues	
Potable water supply	Some issues (manageable)	Some local upstream network upgrades required and are budgeted in the draft 10 Year Plan.
Wastewater supply	Some issues	Localised downstream upgrade is required for part of site. Budgeted

	(manageable)	in draft 10 Year Plan.
Stormwater management	Significant issues (manageable)	The site discharges to open channels to the north-east and south-east. There is no capacity information for these channels. Attenuation is required to preserve the receiving environment from erosion. The site eventually discharges to Leith Stream, so there may be significant costs to attenuate stormwater to ensure flood hazard for the Leith Stream is not increased. These would be at the developers cost.
Transport effects (local)	Significant issues (manageable)	Consideration of connectivity will be required at subdivision stage. An upgrade of Wakari Road would be required in relation to formation standards, speed management treatments and safety upgrades for active modes.
Transport effects (wider network)	Significant issues (manageable)	A Local Area Traffic Management (LATM) study would be needed. There are current 'rat running' issues through the existing local streets to Helensburgh Road which could be compounded by additional development, prompting the requirement for speed management treatments. The Helensburgh Road/Taieri Road intersection and the Wakari Road/Taieri Road intersection would need to be improved for safety and efficiency.
Compact city – proximity to existing residential areas	No issues	
Compact city - ability to develop land efficiently	Very good	The site has an approximate feasible capacity of 240 dwellings under General Residential 1 zoning.
Effects on Manawhenua values	No issues	
Issues for: <ul style="list-style-type: none"> ● network utility operators ● Southern District Health Board ● Ministry for Education ● FENZ 	Some issues (manageable)	There are electricity transmission lines located on 312 Wakari Road. Existing 2GP rules require setbacks for earthworks from network utility structures. It is likely that the presence of the lines will reduce the development potential on this site.
Other constraints on development (encumbrances, owner aspirations, appeals)	Some issues (manageable)	There is a building line restriction for future road widening on some sites; however, this falls within the road frontage setback and so should not affect development. There is a building restriction on 195 Wakari Road to provide a setback from the Bain Reserve, to protect its amenity and those of the adjacent residential properties. This will have minor impacts on development unless it is removed. Some sites are subject to easements in relation to rights of way and 3 waters

		<p>infrastructure. These are unlikely to have any significant impacts on development.</p> <p>The property owner of 265 Wakari Road is not interested in developing this site.</p> <p>The site is subject to a 2GP appeal by The Coalition Preservation Trust to rezone the land from Rural Residential to Rural.</p>
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Appendix 2b: Appendix C.11 to s42a Report.

APPENDIX C.11 Rezoning Assessment Sheet – Wakari Road Area (GF11)		
SITE DETAILS		
Change Number	GF11	
Site outline image		
Site Address	307 Wakari Road, 312 Wakari Road, 280 Wakari Road, 296 Wakari Road, 245 Wakari Road (in part), 195 Wakari Road (in part), 311 Wakari Road (in part), 301 Wakari Road (in part), 265 Wakari Road (in part), 225 Wakari Road (in part).	
Full area assessed	As shown in map above	
Site Area	23.3 hectares	
Current zoning	Rural Residential 2	
PROPOSAL DETAILS		
2GP Zone assessed	General Residential 1	
ASSESSMENT CRITERIA		
Slope	Some issues	The majority of the site is gently to moderately sloping, with some steeper slopes on 280 Wakari Road.
Aspect - Solar access	Ok	Generally south or east facing, and gently to moderately sloping

Accessibility – Public Transportation	Good	The nearest high frequency bus stop is approximately 500m away.
Accessibility - Centres	Ok	Helensburgh neighbourhood centre is approximately 1,000m away
Accessibility – Schools	Very good	Wakari School is the closest primary school to the site, at approximately 1.4km. away
Rural character/visual amenity	Moderate issues	<p>The site has relatively high rural character and amenity values and this will change with general residential scale development. Parts of the area are visible from Wakari Road and in long views from the Roslyn area. Note that part of the area adjoining the Wakari Road has already been identified for future residential development (RTZ).</p> <p>(Updated 2022 comments): It is considered that adverse effects of the proposed rezoning on existing rural rural/residential character values are likely to be moderate-high at a local level, adversely affecting the amenity of residents in the adjacent suburbs of Wakari and recreation users of the nearby walking and mountain biking tracks. There is a risk that GR1 development will contrast strongly with existing landscapes. Large Lot Residential development may be more appropriate, at least for some of the sites (particularly 205, 280, 296, and 312 Wakari Rd). Consideration should also be given to implementing low impact urban design and development principles. Consideration should also be given to establishing a planted buffer zone along Wakari Rd (and possibly linking this with the encumbrance).</p>
Impacts on productive rural land	Some issues	The majority of this area is identified as having high class soils, but there are no LUC Class 1 - 3 soils. Most sites in the area are rural residential scale, with only two being of a scale that might result in loss of primary productivity. Overall losses per new site are likely to be low - moderate.
Reverse sensitivity	No issues	
Significant indigenous biodiversity	No issues	
Natural landscapes and natural coastal character	No issues	
Access to the coast and water bodies	No issues	
Significant Trees, heritage items, important vistas or	Some issues (manageable)	There are two scheduled trees (T1171 & T1172) along the south-eastern boundary of 312 Wakari Road. Existing 2GP rules require resource consent for activities affecting scheduled trees. The trees

viewshafts, important green or open spaces		should not affect the development potential of the area.
Natural Hazards	No issues	(Updated 2022 comments): Stantec have reviewed the original assessment, and have recommended no change from the original hazard assessment level (low). The risk of flooding, as raised by one submitter, is considered low and can be addressed through the subdivision process.
Potable water supply	Some issues (manageable)	Some local upstream network upgrades required. The 10 year plan includes funding for all costs associated with extending 3 Waters servicing to new sites, where this is necessary or desired. The 10 year plan also includes the majority of funding required for existing network upgrades across the city, however the exact upgrades funded aren't yet confirmed.
Wastewater supply	Some issues (manageable)	Localised downstream upgrade is required for part of site. The 10 year plan includes funding for all costs associated with extending 3 Waters servicing to new sites, where this is necessary or desired. The 10 year plan also includes the majority of funding required for existing network upgrades across the city, however the exact upgrades funded aren't yet confirmed.
Stormwater management	Significant issues (manageable)	The site discharges to open channels to the north-east and south-east. There is no capacity information for these channels. Attenuation is required to preserve the receiving environment from erosion. The site eventually discharges to Leith Stream, so there may be significant costs to attenuate stormwater to ensure flood hazard for the Leith Stream is not increased. These would be at the developers cost.
Transport effects (local)	Significant issues (manageable)	<p>Consideration of connectivity will be required at subdivision stage. An upgrade of Wakari Road would be required in relation to formation standards, speed management treatments and safety upgrades for active modes.</p> <p>(Updated 2022 comments): As has been previously noted, Wakari Road would need to be upgraded in order to support the increased demand on the network. This upgrade is not currently planned or budgeted for. The upgrade of Wakari Road will need to include suitable provisions for pedestrians and cyclists, traffic capacity and street lighting. Currently, the formation standard of Wakari Road changes significantly at 205 Wakari Road. East of this property, the formed width of the road reduces and there is no kerb and channel or footpaths, and no space for on-road parking. There are steep banks either side of the road and there is a line of power poles which could create issues with footpath construction and/or road widening. It is possible land acquisition would be required.</p> <p>With respect to the design of the internal roading network for the subdivision, it would be appropriate for a structure plan to be developed which includes minimum road design and connectivity</p>

		<p>requirements. This should include:</p> <ol style="list-style-type: none"> a. A requirement to link the site with the Honeystone Street mapped area with a road for the benefit of both sites. b. A requirement to provide access to the subdivision through 245 and 297-301 Wakari Road. <p>Road access through 195 Wakari Road is considered beneficial from a strategic connectivity perspective but could be problematic to achieve due to the constrained width of the leg-in and location of existing driveways immediately adjacent.</p> <p>DCC Transport recommend that a structure plan is put in place over the wider area to ensure the site is developed holistically.</p>
Transport effects (wider network)	Significant issues (manageable)	<p>A Local Area Traffic Management (LATM) study would be needed. There are current 'rat running' issues through the existing local streets to Helensburgh Road which could be compounded by additional development, prompting the requirement for speed management treatments. The Helensburgh Road/Taieri Road intersection and the Wakari Road/Taieri Road intersection would need to be improved for safety and efficiency.</p> <p>(Updated 2022 comments): Provisions for public transport will need to be reviewed given the size of the development. Overall, it should be noted that this development will generate the need for substantial upgrades to the existing transport network, and the detail of these upgrades is not yet fully understood. More work is therefore required to identify the extent of the required upgrades and a funding plan should be developed to ensure the upgrades are delivered in a coherent, fair manner.</p>
Compact city – proximity to existing residential areas	No issues	
Compact city - ability to develop land efficiently	Very good	Estimated feasible capacity of 240 - 308 dwellings under General Residential 1 zoning
Effects on Manawhenua values	No issues	
<p>Issues for:</p> <ul style="list-style-type: none"> ● network utility operators ● Southern District Health Board ● Ministry for Education ● FENZ 	Some issues (manageable)	<p>There are electricity transmission lines located on 312 Wakari Road. Existing 2GP rules require setbacks for earthworks from network utility structures. It is likely that the presence of the lines will reduce the development potential on this site.</p>

<p>Other constraints on development (encumbrances, owner aspirations, appeals)</p>	<p>Some issues (manageable)</p>	<p>There is a building line restriction for future road widening on some sites; however, this falls within the road frontage setback and so should not affect development. There is a building restriction on 195 Wakari Road to provide a setback from the Bain Reserve, to protect its amenity and those of the adjacent residential properties. This will have minor impacts on development unless it is removed. Some sites are subject to easements in relation to rights of way and 3 waters infrastructure. These are unlikely to have any significant impacts on development.</p> <p>The property owner of 265 Wakari Road is not interested in developing this site.</p> <p>The site is subject to a 2GP appeal by The Coalition Preservation Trust to rezone the land from Rural Residential to Rural.</p>

Appendix 3: Structure Plan for 312 Wakari Road.



Proposed Lot 13 is to be Vested in DCC for a Potential Foul Sewer Pumping Station

terramark
setting new boundaries
 Surveying, Resource Management, & Engineering Consultants

PROVISIONAL ONLY
 DETAIL, AREAS & DIMENSIONS ARE SUBJECT TO FINAL DESIGN, RESOURCE CONSENT & FINAL SURVEY

- Notes:**
- 1) Areas and dimensions are subject to verification upon the final Land Transfer Survey
 - 2) Critical Points are to be confirmed by Survey
 - 3) Boundary Location to be confirmed upon the final Land Transfer Survey
 - 4) Services shown have been adopted from DCC drainage records
 - 5) Contractor is responsible to locate all underground services prior to commencement of work.
 - 6) The plan may not be copied without the approval of Terramark Ltd.
 - 7) These notes are an integral part of this plan.
 - 8) This plan is not intended to be used for architectural design purposes and has been prepared specifically for the purpose of this application.

Project Title:
Lot 1 - 13 Being a Subdivision of Lot 2 DP 15027

Address:
312 Wakari Road Helensburgh

Legal Description:
Lot 2 DP 15027

Client:
Grant Motion

Area: 2.6596 Ha	Title Reference: 8929
Date: 29/07/2022	Scale (A3): 1:1000
Job No: D12465	Plan No: 1
	Revision: A

National Grid Subdivision Corridor Mapped Area