



4 August 2022

The Variation 2 Officer  
Dunedin City Council  
PO Box 5045  
Dunedin

**RESPONSE TO VARIATION 2 s42A REPORT  
GF 12 (233 SIGNAL HILL ROAD)  
SUBMITTER: HARRY HARDING**

Attached:

- Evidence plan showing road upgrade detail (Paterson Pitts Group)

Please find below, the submitter's response to the s42a recommendations that relate to this greenfields site.

**Background**

The area proposed for rezoning is the northernmost part of 233 Signal Hill Road, outside the Significant Natural Landscape Overlay Zone (SNL), and is located at the end of Birchfield Avenue and Pleasant Place.

The site is elevated and receives good solar access through its north-facing slopes.

The submitter proposes that this land be rezoned into the Large Lot Residential 1 Zone, which allows for sites as small as 2,000m<sup>2</sup>. The area of land proposed to be rezoned within 233 Signal Hill Road is 1.67ha (the area of the new zone is 1.87ha, however part of this area is contained within the adjoining road corridors, and not within the property at 233 Signal Hill Road). Therefore, this rezoning will produce a maximum yield of 8 sites.

**Biodiversity Matters**

Change GF12 includes the protection of an area of significant vegetation within the property as an Area of Significant Biodiversity Value (ASBV). This adjoins an ASBV on the neighbouring property, 235 Signal Hill Road, encompassing a significant area of native bush.

The s42a report concludes that given the area of GF12 does not include the area of significant vegetation, and is located immediately adjacent to existing residentially zoned land, I consider the risk of adverse effects to biodiversity values through fragmentation is reduced for this locality.

We consider that any adverse effects of the proposed rezoning on biodiversity values will be no more than minor.

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## **Landscape and Rural Character**

The proposed rezoning fills the 'gap' between the existing GR1 Zone and the boundary of the Significant Natural Landscape feature. The proposed Large Lot Residential 1 Zone format, with a minimum site size of 2,000m<sup>2</sup>, will achieve a sensible transition between high-density urban environment, to a low-density urban environment, and then into the protected landscape environment.

We consider that any adverse effects of the proposed rezoning on landscape and rural character values will be no more than minor.

## **Transportation Matters**

The attached evidence plan showing road upgrade detail (prepared by Paterson Pitts Group) contains information that is relevant to the discussion under this section.

The s42a report advises that DCC Transport has assessed this site, with the key concern being a question over how access to the site would be provided. The s42a report advises that '... if access could be provided for vehicles from Signal Hill Road, Signal Hill Road does not have any dedicated infrastructure for non-motorised road users (e.g. footpaths), which would be expected in a residential zone'. It further notes that 'To the north, legal access is available from Thirlstone Street via Pleasant Place and Birchfield Avenue. The formation of both Pleasant Place and Birchfield Avenue is considered by DCC Transport to be inadequate to support further residential development, as the roads typically support one-way movement only and there are no footpaths. Access for emergency vehicles is likely to be problematic'.

I have reviewed the opportunity for suitable access to be provided for the rezoning land. I consider that there are three distinct possibilities for access, with two of these being reasonably feasible and the third feasible but dependant on the consent of an adjoining owner.

The first access option, and the one that possibly best complies with Council's standards, involves the extension of a full road formation within the Pleasant Place legal road corridor between the intersection of Pleasant Place and Birchfield Street, and the land at 233 Signal Hill Road. The attached plan describes the nature of the upgrade works that would be required to achieve this, including a full 6.0m wide sealed carriageway and a 2.0m sealed footpath on one side of the road. The legal road corridor width of slightly more than 10m is sufficient to accommodate the proposed carriageway and footpath. The grade of the road would match the existing road grade, being in the order of 1:5. This grade is steep, however not an unusual grade for roads that extend south from North Road. The road grades determined in this assessment have been calculated from the contour information that is shown on the plan.

The estimated cost of the road upgrades is shown in the table on the attached plan. This concludes that the total cost to upgrade Pleasant Place to a suitable standard for residential

activities will be in the order of \$309,000. While this is a relatively significant cost, when spread across the expected yield of 8 sites, this becomes a little under \$40,000 per site. I believe that the development of these sites, and the returns available from 8 large, well-appointed properties, will be able to accommodate the cost of upgrading Pleasant Place.

Furthermore, if the proposed road upgrades were to be completed, it would appear that this would resolve a number of issues that several further submitters have raised. There would clearly be some level of broader community benefit resulting from a comprehensive road upgrade of Pleasant Place.

The second option for access is to provide a new access, most probably by way of a right-of-way arrangement, to Signal Hill Road. This access would, for a relatively short length, pass over the land at 235 Signal Hill Road, however a right-of-way already exists that would support this access. An arrangement of this nature would likely comply with the 2GP given that the yield from the new zone is only 8 sites. However, this would not necessarily provide for non-motorised transport modes, although there is no reason why a footpath could not be constructed along the Pleasant Place corridor for pedestrian and cycle access.

The third option is the possibility of providing road access from North Road, through 235 Signal Hill Road. The 2GP has recently been updated to enable residential development along the northern boundary of 235 Signal Hill Road and this is expected to include the construction of a new road through this corridor. It may be possible for that road to be extended into the new rezoning land at 233 Signal Hill Road. In fact, this potential access has been previously considered, and is why the rezoning area includes a narrow corridor at its northeastern end that extends as far as the boundary with #235. However, this access requires the consent of the owner at 235 Signal Hill Road, so it is not an option that the submitter has full control over.

Overall, it is my view that there are a number of viable options for suitable access into the rezoning area. Two of these options are feasible (in terms of both engineering and cost considerations) and are able to be implemented by the developer without relying on external party approvals. Accordingly, I believe that Council's concerns in relation to access uncertainties have been adequately addressed.

### **3-Waters Matters**

#### Water Supply

The s42a report concludes that firefighting water requirements are appropriately provided for at this location, however the ability for a fire engine to access the site would be dependent on appropriate upgrading of Pleasant Place and Birchfield Avenue, or an alternative access.

The upgrade of Pleasant Place, as discussed in the section above and outlined on the attached plan, will result in a full 6.0m wide sealed road, with a grade of around 1:5. I have recently taken advice from FENZ around the maximum grade for a fire applicant to navigate (this was in relation to a different site), and the response was that a grade of 1:5 was

achievable. On this basis, I consider that fire engine access to the rezoning land will be possible if Pleasant Place is upgraded as described above. Should a different form of access be implemented, then the developer may need to consider alternative forms of fire protection, such as on-site water storage tanks or sprinkler systems within the new houses.

Overall, I consider that there are methods available that will satisfactorily comply with the required fire protection standards.

#### Wastewater

There is a DCC foul sewer service located in Birchfield Street (some 70m from the rezoning land). It appears that this could be extended relatively easily to provide a suitable means of wastewater disposal for the new sites.

#### Stormwater

The s42a report notes that stormwater management will be required as per the rules covering new development mapped areas (NDMA's). This requires that there is no increase in the pre-development peak stormwater discharge rate from the development area.

We are agreeable with the above statement and note that in order to maintain pre-development flows, it is often necessary to install stormwater detention measures within developments. This is becoming fairly commonplace, and I have no doubt that this can be implemented on the subject land. The larger site sizes that are provided for in the Large Lot Residential 1 Zone result in a wealth of available space for individual on-site stormwater detention facilities.

Overall, I am confident that there are methods available to ensure that any adverse effects from stormwater are no more than minor.

#### **Hazards**

The s42a reporting officer notes that 'Further geotechnical investigation and advice would be needed to inform any future development of the site. If the geotechnical advice is found to not be in favour of development, or that the proposal would create or exacerbate any hazard to neighbouring lots, then subdivision consent is unlikely to be granted. It is likely that mitigation will be needed to ensure no negative effects on neighbouring lots. However, overall I consider these issues manageable at the time of subdivision'.

We agree with the position outlined by the reporting planner.

#### **Productive Land**

The s42a report concludes, in regard to productive land, that 'the rural productivity potential of the land is low, given its location adjacent to existing residential activity, steep slopes, and current land cover. Furthermore, given that the area of mapped high class soils

is only around 1,600m<sup>2</sup>, I consider that overall its loss is not significant compared to the benefits that would result from residential zoning’.

We agree with this conclusion.

### **Rural Amenity and Outlook**

The s42a report notes that ‘The DCC Landscape Architects considers that Large Lot Residential development, where visible, will likely be seen as an extension of the neighbouring residential area and will not notably intrude on views to the hill slopes within the SNL above the site from surrounding public locations. Consequently, the overall effects on existing visual amenity and landscape character will be low.

We agree with this conclusion.

### **Structure Plan**

No Structure Plan is supplied with this evidence.

### **Planning Matters**

The s42a reporting planner has concluded that ‘As there is no apparent means of accessing the site, and no information has been provided by the landowner or developer as to how this issue may be resolved, I consider that there is an inherent conflict with Policy 2.6.2.1.d.x and that residential development is not feasible. I therefore recommend ... that the area not be rezoned to residential, and that the zone remains Rural. If appropriate access can be demonstrated, then I could support rezoning to Large Lot Residential 1’.

The submitter has provided reasonably thorough evidence in this document and on the attached plan to demonstrate that feasible access is available, from several different locations.

The reporting planner has concluded that the only issue preventing this land from being appropriately rezoned into a Large Lot Residential 1 Zone format is the question over access. We believe that this question has been addressed, and several viable solutions presented. On this basis, it is anticipated that the reporting planner may now be able to revert to the original recommendation that this land be rezoned.

Yours faithfully

**PATERSON PITTS GROUP**



**Kurt Bowen**

Registered Professional Surveyor

