

Lorna Jackson

From: grapea42@gmail.com
Sent: Monday, 26 June 2017 04:39 p.m.
To: Resource Consent Submissions
Subject: Resource consent application submission - 596539
Attachments: Submission-OutramRural_Urban.pdf

This resource consent application submission has been made via the Council website on **26 Jun 2017 4:39pm**. The details are listed below.

Personal information

Name Donna Peacock

Address

Contact phone

Fax

Email address

Submission details

Consent number Non Complying Activity - 91 and 97 Formby Street - SUB-2017-43, LUC-2017-222 & LUC-2017-223
Position I oppose this application
Wish to speak? No
Present jointly to hearing? No
Parts of application that submission relates to DCC provision under a comprehensive framework to manage the effects of use and development of resources in this case appropriate land use.
Reasons for submission Non-complying activity. Setting a precedence for sub-division of land on good food producing soil in the Taieri - inappropriate on-going of land for housing.
Desired decision Decline the application according to in accordance with Section 4 of the District Plan, objective 4.2.5.
Privacy statement acknowledged Yes

Supporting documents

Submission-OutramRural_Urban.pdf, type application/pdf, 126.9 KB - file name

No file uploaded - file name

SUBMISSION: Non Complying Activity – Outram

Donna Peacock

Non Complying Activity:

91 and 99 Formby Street - SUB-2017-43, LUC-2017-222 & LUC-2017-223

Opposition to this application.

The DCC's District Plan states that permitting non-complying activities could set a precedent. There should be a commitment to the protection of high quality soils on the Taieri – this fundamental principle should be upheld.

I am a retired teacher and Grandparent of 11 Mokopuna.

Opposition is based on the following points from of Section 4 of the District Plan - Sustainability section objectives:

- 4.2.1 Enhance the amenity values of Dunedin.
- 4.2.2 Ensure that the level of infrastructural services provided is appropriate to the potential density and intensity of development and amenity values of the area.
- 4.2.3 Sustainably manage infrastructure.
- 4.2.4 Ensure that significant natural and physical resources are appropriately protected.
- 4.2.5 Provide a comprehensive planning framework to manage the effects of use and development of resources.

Under rule 18,5,2, the subdivision of rural land into sites smaller than 15.0ha is a non-complying activity and the building of new houses on sites with less than 15.0ha of rural-zoned land is non-complying activity pursuant to Rule 6.5.7(i)

1. Exceptions to the District Plan should only be made after extensive public consultation and with consideration for the future needs of the general area.
2. The subdivision of rural land into sites smaller than 15.0ha is a non-complying activity under rule 18,5,2, and the establishment of new houses on sites with less than 15.0ha of rural-zoned land is non-complying activity pursuant to Rule 6.5.7(i) Establishment of residential dwellings on 1.63ha, at 91 Formby St is of particular concern.
3. DCC should not consider exceptions to the District Plan on the basis of personal desire. An exception to the rule which then allows others the same benefits can be seen as yet another decision for personal monetary gain rather than seeking that of community at large.
4. Setting a precedent will enable large tracts of land to be lost to subdivisions for housing and this action increases inflation on land values and on subsequent further subdivisions

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Donna Peacock

5. An example of this would be the further resource consent application to build 15 houses on approximately 8ha of rural land in Holyhead St, which was also previously used for market gardening. In 2013 this application was declined by the DCC and although the Environment Court reached a mediated settlement with the DCC much of this land remains rural. Consideration should be given to these previous decisions.
6. Granting applications for re-zoning in a piecemeal fashion in opposition to the District Plan will mean expansion of housing on quality food-growing land and the accumulative loss of available top-class soil for essential community food sources.

Quote - RMA - Section 5:

It should allow the local community to provide for its wellbeing, health and safety while sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations (s5(a)), safeguarding the life-supporting capacity of air, water, soil, and ecosystems (s5(b)) and seeking to avoid, remedy or mitigate any adverse effects of activities on the environment (s5(c)).

In addition, section 7 requires that particular regard be given to the efficient use and development of natural and physical resources (s7(b)); the maintenance and enhancement of amenity values (s7(c)); and the maintenance and enhancement of the quality of the environment (s7(f)). The hearing committee: Residential development will remove the ability to productively use the high class soils for present or future generations. While the Taieri Plain features large tracts of productive soils, and the subject area is small (6.7 ha), development within the wider area is cumulatively diminishing the productive potential. The proposal, along with other similar developments, will reduce the life-supporting capacity of the soil and its potential to meet the needs of future generations.

TO SUMMARIZE:

- A. The Taieri Plain is recognized as having high-quality soils for market gardens and could play a significant role in food availability for the Dunedin Community in the near, and not too distant future. Our changing times require vigilance and forward-looking decisions on the part of our leaders, if our children are to have provision for their basic needs of essential food security – along with clean water and affordable shelter.
- B. Crisis risk: In the not-so-distant past our food was available close at hand – Dunedin now sources food from Christchurch and the north. This is due to the increase in supermarket systems and land price increase resulting from the growing dairying and housing industries. Disrupted transport systems are likely to mean food depletion for a long period. Recently: Westcoast/ Canterbury – via Arthur's Pass; Kaikoura. (Of interest may be the regular 300-year-interval movement of the alpine fault which is due, and of which is said will affect the whole of the South Island).
- C. Transportation: Consideration of the need to reduce our emissions.
- D. Future rise in the cost of food is anticipated because:

SUBMISSION: Non Complying Activity – Outram

Donna Peacock

- E. NZ will soon be required to account for ETS trading of carbon credits.
 - F. The cost of fossil fuel transport
 - G. The uncertain future of oil.
 - H. The inevitability of carbon taxes
-
- I. The only local grower in the Taieri area who sells at the Otago Farmers Market, McArthurs Berry Farm, was recently sold. The only other vegetable stalls are in Central Otago and North Otago.
 - J. Market Forces: A return of market gardening to the Taieri will not be brought about by market forces (as evidenced in many other areas of our economy).
 - K. Future proofing our land: Piecemeal development without long-term consideration will lead to lack of flexibility for various other land uses in the immediate and long-term future. Our food will increasingly be grown close to cities and towns.
 - L. The monetary gain of present owners is not a legitimate reason to make exceptions. 'Future-proofing' of food security; and the needs of the whole community should take precedence, as required, and protected under the DCC's District Plan.
 - M. Community ownership of the land would result in it being worked by the community with the development of experience and skills in young people; and supplying the local Farmers' Market. The expertise of many existing groups of experienced and skilled people could be utilized.

CONCLUSION:

In accordance with Section 4 of the District Plan, objective 4.2.5, I respectfully make the request that a comprehensive overview and planning be undertaken by the DCC to manage the use and development of the high class soils on the Taieri Plain and that the Council look at the possibility of tracts of land being bought up by the council (with community input?) for this purpose. The DCC's foresight in purchasing a tract of Otago Peninsula land is an example of what might be done.

Further development of Taieri land without wise and careful consideration of our future climate and food situations will jeopardize our food sources.

Citizen / DCC responsibility to future generations is great, considering the world's and our country's future resource limitation. The DCC has a responsibility, to present and future generations, to ensure our communities and city have food security.

Donna Peacock - TCB, B.Ed. Dip Tchg.
Member, Seniors Climate Action Network.

DUNEDIN CITY COUNCIL

SUBMISSION FORM 13
Submission concerning resource consent on publicly notified application under section 95A, Resource Management Act 1991

To: Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

Resource Consent Number: SUB-2017-43, LUC-2017-222 & Applicant: C C Otago Limited

Site Address: 91 & 99 Formby Street, Outram

Description of Proposal: To subdivide the land of Lot 2 SUB-2017-33 (part of 99 Formby Street) into nine lots, with land use to establish residential activity on each of the new lots. To establish a residential dwelling on 1.63ha at 91 Formby Street on Rural zoned land.

I/We wish to lodge a submission on the above resource consent application (Please read privacy statement):

Your Full Name: ANDY BARRATT

Address for Service (Postal Address): [REDACTED] Post Code: 9471

Telephone: [REDACTED] Email Address: [REDACTED]

☐ I would like my contact details to be withheld.

I: Support/Neutral ☒ Oppose this Application I ☒ Do Not wish to be heard in support of this submission at a hearing

☒ If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Please use the back of this form or attach other pages as required

The specific parts of the application that this submission relates to are:

ALL PARTS.

My submission is (include the reasons for your views):

I REPRESENT OUR FOOD NETWORK DUNEDIN.
AN INFORMAL GROUP PROMOTING LOCAL FOOD PRODUCTION.
WE OPPOSE THIS APPLICATION ON THE GROUNDS THAT
IT WILL TAKE HIGH-CLASS SOILS IN THE RURAL
ZONE OUT OF PRODUCTIVE USE BY ALLOWING
RESIDENTIAL DEVELOPMENT.

The decision I wish the Council to make is (give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought):

DECLINE THE APPLICATION IN ITS ENTIRETY

Signature of submitter: [Signature] Date: 26/6/2017
(or person authorised to sign on behalf of submitter)

Notes to Submitter:

Closing Date: The closing date for serving submissions on the Dunedin City Council is Monday, 26 June 2017 at 5pm. A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Dunedin City Council. The applicant's address for service is C/- Cubitt Consulting Ltd, 11 Bedford Street, Dunedin 9012 or allan@cubittconsulting.co.nz.

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be made online at <http://www.dunedin.govt.nz/rma> or sent by email to resconsent.submission@dcc.govt.nz

Privacy: Please note that submissions are public. Your name, contact details and submission will be included in papers that are available to the media and the public, including publication on the Council website. You may request your contact details be withheld. Your submission will only be used for the purpose of the notified resource consent process.

Lorna Jackson

From: Andrew Barratt
Sent: Monday, 26 June 2017 01:12 p.m.
To: Resource Consent Submissions; allan@cubittconsulting.co.nz
Subject: Resource consent application 91 and 99 Formby St Outram
Attachments: 2017-06-26 13-00-13(1).pdf

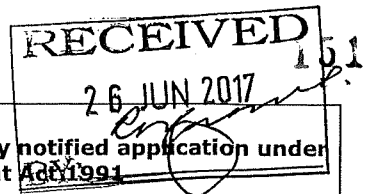
Please find attached submission on behalf of Our Food Network Dunedin.
Andy Barratt



DUNEDIN CITY COUNCIL
Kaunihera-a-rohe o Otepoti

SUBMISSION FORM 13

Submission concerning resource consent on publicly notified application under section 95A, Resource Management Act 1991



To: Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

Resource Consent Number: SUB-2017-43, LUC-2017-222 & **Applicant:** C C Otago Limited
LUC-2017-223

Site Address: 91 & 99 Formby Street, Outram

Description of Proposal: To subdivide the land of Lot 2 SUB-2017-33 (part of 99 Formby Street) into nine lots, with land use to establish residential activity on each of the new lots. To establish a residential dwelling on 1.63ha at 91 Formby Street on Rural zoned land.

I/We wish to lodge a submission on the above resource consent application (Please read privacy statement):

Your Full Name: Dunedin Rural Development

Address for Service (Postal Address): 90 P.O Box 5990 Dunedin 9058

Post Code: 9058

Telephone: (03) 4766251 **Email Address:** landforse@ihug.co.nz

☐ I would like my contact details to be withheld.

I: Support/Neutral/Oppose **this Application** **I: Do/**Do Not **wish to be heard in support of this submission at a hearing**

☒ If others make a similar submission, I will consider presenting a joint case with them at a hearing not sure yet

Please use the back of this form or attach other pages as required

The specific parts of the application that this submission relates to are:

- (1) The residential lots 1, 2, 3, 4, 5, 6 + 7 + 8) being approved & lying on High class soils
- (2) The proposed building sites on Lot 2 DP 7816, 1.63 ha & Lot 9 2.6ha being approved on High class soils

My submission is [include the reasons for your views]:

- (1) ~~the~~ the whole property is on High class soils (HCS)
- (2) The HCS are limited & need protection for future productive primary production
- (3) Refers to attached 6 page submission

The decision I wish the Council to make is [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

- (1) Review the use of residential Lots 1-8 on H.C. land
- (2) Decline the application for consent for buildings on Lot 2 DP 7816 (1200m² site) & Lot 9 (1200m² site).
Refers to attached submission

Signature of submitter: M. J. Hume on behalf of Dunedin Rural Development **Date:** 26/6/017
(or person authorised to sign on behalf of submitter)

Notes to Submitter:

Closing Date: The closing date for serving submissions on the Dunedin City Council is Monday, 26 June 2017 at 5pm. A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Dunedin City Council. The applicant's address for service is C/- Cubitt Consulting Ltd, 11 Bedford Street, Dunedin 9012 or allan@cubittconsulting.co.nz.

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Privacy: Please note that submissions are public. Your name, contact details and submission will be included in papers that are available to the media and the public, **including publication on the Council website**. You may request your contact details be withheld. Your submission will only be used for the purpose of the notified resource consent process.

Applications for Subdivision and Land Use Consents

CC Otago Limited.

91 Formby St and 99 Formby St, Outram

Resource Consent Number:

SUB-2017-43, LUC-2017-222 & LUC-2017-223

Resource Consent Submission

For Non Complying Activity under the Dunedin City District Plan

Submitter-Dunedin Rural Development Incorp. (DRD)

Dunedin Rural Development Inc (DRD) Background

DRD has been in existence for over 22yrs now. Its prime objective is to identify, assess, develop and introduce to Dunedin, rural opportunities which have commercially competitive advantages taking into account marketability, technical development & production process.

DRD runs field days, seminars and facilitates activities in the rural sector with the aim on positive employment outcomes. Over recent years DRD has provided seeding funds for various research projects and infrastructural support.

One such significant funding project in 2014yr was to provide \$30,000 funding in association with Otago Regional Council for Landcare Research to further identify soils in Otago and Dunedin City area for their new web based S-Map system. This project enabled further refinement and delineation of the soil maps and productive soils within Dunedin City along with additional technical information sheets that can be viewed via the Landcare website.

Summary of Submission comments

1. Dunedin Rural Development Incorp (DRD) opposes this application based mainly of the loss of and long term protection of High Class soils.
2. It appears that this application is being accelerated before the rule changes and new controls are put in place pending the final outcomes of the Dunedin City 2GP plan.
3. Review the residential proposed lots (ie Lot 1, 2, 3, 4, 5, 6, 7, and 8) and their intended use on High Class soils.
4. **High Class soil on this application site.**
Contrary to the Planners report the whole land area ie Nos 91 and 99 Formby Road are occupied by High Class soils ie 1.63 ha plus 0.9180ha plus 2.6 ha= total of 5.148ha comprising of three main soil types namely:

Pomahaka Deep sandy loam-gently undulating phase. This soil runs in a band from the top left hand corner in Lot 2 DP 7816 encompassing all the east boundary down to the bottom corner where Formby road meets Huntly Road. This soil type is formed on deep fine alluvium from historic flooding over many centuries. They generally are well drained and have deep rooting depth and moderate to high water holding capacity which makes them suitable for market gardening & intensive crop use.

Clutha Deep silt loam over sandy loam, gently undulating phase

This soil is in a complex association on the remainder of the land to the west of the Pomahaka soils described above being mixed in pockets with the Pomahaka soil (but tending to a loamy silt loam) & also with pockets & bands of the Clutha silt loam.

The Clutha soil occurs on old floodplain levees and are very versatile with good physical properties for plant growth, deep rooting depth and moderate to high water holding capacity. They can have a structural vulnerability to degradation due to long term cultivation and compaction (by machines and stock) in particular if best soil management practices are not undertaken. In pockets and small undulations one can find slight water ponding but not so where sandy texture exists.

Matau deep loamy silt, gently undulating phase

This soil type is found here in a complex association with the other two types described above. Formed from fine alluvium they are very versatile to various intensive land uses, having generally a deep rooting depth. They may have some vulnerability depending on the intensity of land use such as to long term cultivation or compaction. Can be water logged for short periods due to slow subsoil permeability.

Note. A more detailed site inspection of the band of soils mapped on the west side may in fact identify at a more detailed scale one soil type only and not a complex.

No field analysis or onsite inspections have been undertaken. The soil summary above have been compiled from the writers expertise and from the DCC soil data fact sheets.

Nevertheless, in summary the whole site under consent application has "High Class Soils".

Reference to Appendix three of this submission summarises the 13 key parameters that enable a soil to be identified as HIGH CLASS by Landcare Research.

5. Soil Quality and Loss of High Class land and soils.

Refer to Appendix one which highlights some key national and local issues and concerns over the ongoing cumulative loss of HCS. Once these soils have been lost to building platforms and more intensive subdivisions there is no reversal system in

place, ie they are lost forever from the ability to produce intensive crops, market gardens and the like.

Appendix two is very important as this table portrays a clear picture on the present area of HCS that exist within the Dunedin City Council area. In summary we now only have about 5% land area left supporting HC Soils. We cannot afford to continue to loose these sites to subdivisions and various building developments.

High Class soils are a finite limited resource and need to be protected and managed for primary production now and well into the future.

6. The Planning application report May 2017 states in various place eg Sec 2.7, page 10 states "been used for market garden purposes in the past. However, that is no longer economic and the site is now used for grazing". This maybe fact but it is no valid reason to allow new building sites to be approved on High Class land. Future production opportunities will be lost.

Furthermore, next paragraph re 91 Formby St states "dwelling site from the Residential 5 land to the rural land will have little impact on the high-class soil resource". Furthermore "no high class soil will be removed from the site".

Again a similar statement is made with respect to 99 Formby St especially with lot 9.

DRD contend that the inference on words 'little impact' is incorrect and is really undervaluing the importance of the soil resource. For every subdivision if allowed on HCL would quickly diminish this important resource. It is the loss of the soil in situ that is the issue when a track or building site is constructed and natural HCS are removed.

7. The proposed building platform for Lot 2 DP 7816 (1.63ha) and Lot 9 (2.6ha). There is no mention of a carriage way having to be constructed and formed to these two sites. Both building sites are proposed to be 1200msq each (ie total of 2400m sq for two buildings) and if you consider two separate formed metalled tracks to each platform say at 4m wide minimum (some 200m length or thereabouts) equates to a loss in total of over 4000 sq m (ie 0.4ha) of high class soils. Other small buildings and the like can in time be planned and constructed on site.

Submission prepared by:

Murray Harris Chairman Dunedin Rural Development

26th June 2017



C/o Box 5990, Dunedin 9058 021 616 605 e mail contact..landfors@ihug.co

Appendix one

Background Information on High Class soils in Dunedin City catchment

Note part of the following extracts are from the submission by DRD as presented to the Dunedin City 2GP hearing committee on the 17th February 2017.

Protection of High Class soils in 2GP-for food production

The issue of high class land and soils being lost to urban development and subdivisions is a real dilemma in the Dunedin City Council area and throughout NZ.

In May 2011yr it was noted that there were 175,000 Lifestyle blocks in NZ covering 873,000Ha and these along with urbanisation, potentially constrain future land productivity.

Lifestyle blocks occupy 10% of NZ HCL, while urbanisation since 1990 occupies 0.5%.

Andrew, R and Dymond J R 2013 identified that in Otago in 2012, 87.8kha of HCL existed of which 10% was occupied by Lifestyle blocks.

This gradual loss of HCL means that the lower class lands which are less efficient in food production will be used more and will require more inputs and energy to produce the same quantity of food product. In simple terms this puts additional environmental and economic pressure on the same land area.

Dr John Fairweather in his 1996 study found that lifestyle block owners generally do not engage in high levels of production on their blocks of land (as compared say to a neighbouring farmer on similar land).

Significance of HCL in DCC- Refer to Appendix two

Note that

- The DCC is the only Council in Otago with any LUC 1 land (3082ha).
- The DCC has approx. 12044.78ha (or 3.6%) of HCL based on the detailed soil surveys. However the accurate figures for the urban areas-peri urban areas are not clear.
- The DCC has approx. 16,804.44ha ie 5.1% land classified Land Use Capability 1 +2 +3e (This total of course includes the soils mapped as HCL at the 1:25,000 scale maps.

Loss of HCL-Impact on future Food Production

Julian Cribb a leading international Journalist addressed the Horticultural NZ Conference in August 2015 and noted that the change from dairying to horticulture will occur in 2030-2050 as Asian markets begin to demand more vegetables than dairy products.

Growing vegetables is more efficient on land eg 30 tonnes of cabbage can be grown using the same amount of water to produce 2kg of beef.

Horticulture NZ Chief Executive Mike Chapman stated (in Rural News Oct 18th 2016yr) that staples of the NZ food basket, such as carrots, potatoes, onions and leafy greens must be a consideration in urban planning.

"Parts of the NZ food chain are, in our view, being affected by constraints on production because of competition for suitable land for housing and access to water Chapman says". Effects of shortages, or no supply, may result in increased prices for access to food staples such as carrots, potatoes, onions and leafy greens. Furthermore, a recent Auckland Council report, which investigated growers in the premium vegetable growing area of Pukekohe, concluded that research needs to look at the consequences of continuing urban growth and rural fragmentation on both the regions, and the country's, food growing capacity.

Comparing horticulture with dairy farming the following emerges; namely that 50,000 people are employed in the 7billion industry operating on 123,000ha while dairy returns \$18billion and employs about 30,000 people on 2.5m ha.

Appendix two

Summary of High Class Soils and Land Use Capability (in ha) in Dunedin City

Compare 2GP Plan with Operative Plan

Second Gen Plan	LUC 1	LUC 2	Total LUC 1+2	All LUC 3	Total LUC 1+2+3=	High Class soils classif	Difference HC area and LUC 1+2
Rural	2666.99	6829.51	9496.5	19705	29201.5	11534.09	2037.59
Rural Residential	117.44	252.69	370.13	946.86	1316.9	377.57	7.44
Urban	297.92	338.66	636.58	951.14	1587.7	133.12	503.46
Grand Total	3082.35	7420.87	10503.22	21603.01	32106.2	12044.78 3.6% DCC area	1541.58
Operative Plan							
Rural	2711.52	6833.61	9545.13	19988.77	29533.8	11756.25	2240.8
Rural Residential	91.38	252.69	344.07	721.61	1065.68	254.65	89.42
Urban	279.44	334.55	613.9	892.62	1506.61	33.88	580.02
Grant Total	3082.35	7420.87	10503.2	21603.01	32106.2	12044.78	1541.58

Data Source- DCC Planning Department July 2016 and data from Landcare Research 1992.

Note-the difficulty to assess accurately the present area of High Class soils in the Urban zone and no idea what has been built on and the area buildings take up.

Summary of LUC land in DCC area broken down to subclasses (Source Landcare Res 1992)

LUC 3e	6301.22ha	Erosion limitation eg sheet and wind forms	
LUC 3c	5113.85ha	Climate limitation eg altitude on arable land	
LUC 3s	4580.30ha	Soil Limitation eg stones and soil pan	LUC
3w	5652.89ha	Wetness limitation eg swampy, drainage	
Total LUC3	= 21648.28ha	(nb Total differs by 45ha from the above table).	

The new proposed 2GP Plan

Assuming then that LUC 1+2+ 3e is used as the productive soil base then this equates to 16,804.44ha ie it encompasses 5.1% of the DCC land area. Furthermore, the difference from LUC 1+2+ 3e and total HCS mapped is 16,804.44ha less 12044.78ha which equates to 4759.66ha difference in land area.

Note Map scale difference when comparing LUC with HCS

High Class soils mapping in the DCC area was completed at 1:25,000 scale. These map units tend to be larger in size and more accurate in some areas.

Land Use Capability maps in the 1970s were mapped at 1:63360 scale and later converted to 1:50,000 scale (ie 1 sq cm on this map equates to 25ha on the ground)

Appendix Three

Identification Of High Class Land and the Attributes defining HCL

After T.H. Webb, M. R. Jessen, M. Mcleod and R.H. Wilde 1995-Landcare Research

Attributes have been selected for their influence on productivity, crop quality, sustainability or land management.

Properties of High Class Land

ATTRIBUTE	MINIMUM REQUIREMENT
1..Topographic Properties	
-slope	11 degrees
2..Climatic Properties	
-Annual rainfall	1800mm/yr
-Temperature	>10deg C mean annual temp
3..Soil Properties	
-Texture	Sand and loamy sand excluded
-Topsoil gravel content	<15% by volume
-Rock Outcrops	< 10% area
-Natural drainage	Not poor (or is readily drainable)
-Potential rooting depth	>45cm
-Depth to slow permeability	>45cm
-Macropores	>7.5% (over depth of 0-45cm)
-Profile available water	>60mm
-Profile readily available water	>50mm
-pH Minimum	<7.5 and > 4.8 (over depth of 0-45cm)

Lorna Jackson

From: [REDACTED]
Sent: Monday, 26 June 2017 07:53 a.m.
To: Resource Consent Submissions
Subject: Resource consent application submission - 596459

This resource consent application submission has been made via the Council website on **26 Jun 2017 7:53am**. The details are listed below.

Personal information

Name L A Nicol & P W Carr

Address [REDACTED]

Contact phone [REDACTED]

Fax

Email address [REDACTED]

Submission details

Consent number SUB-2017-43, LUC-2017-222, LUC-2017-223

Position I am neutral towards this application

Wish to speak? No

Present jointly to hearing? No

Parts of application that submission relates to Height restrictions to the planting of trees or hedges on the eastern boundary of the subdivision, ie the land with its boundary on Huntly Road being Lots 1 and 9.

Reasons for submission

We reside at 35 Huntly Road. The two main reasons we purchased our home nearly 5 years ago were the rural outlook and all day sun. When we purchased our home at 35 Huntly Road, we knew there was potential for the land at Formby Street to be subdivided under the District Plan and realistically we knew there was a high probability that would happen sometime in the future. Whilst we do not oppose the subdivision at 91 and 99 Formby Street, Outram we would respectfully request that a condition be included in the subdivision consent that the planting of trees or hedges on the eastern boundary of the subdivision (Huntly Road boundary for Lots 1 and 9 and directly across from 35 and 39 Huntly Road) is subject to a height restriction of 2 metres, ie no trees or hedges planted will be left to grow higher than 2 metres in any one place on the Huntly Road boundary of Lots 1 or 9. This would protect the full front of our home from shade and mean we would continue to enjoy all day sun, which is a very important part of our choice to live in Huntly Road, Outram. This would also ensure that this portion of Huntly Road is not kept in shade which would cause frost and ice to lay during the day in the winter months which would make this portion of this already busy road dangerous.

Desired decision The subdivision consent includes a condition that restricts the planting of trees and hedges

on the eastern boundary of the subdivision (the Huntly Road boundary for Lots 1 and 9) so that any tree or hedge planted does not to exceed 2 metres in height at any time in any place on the Huntly Road boundary of Lots 1 and 9.

**Privacy
statement
acknowledged**

Yes

Supporting documents

No file uploaded - file name

No file uploaded - file name

Lorna Jackson

From: Brian Miller
Sent: Friday, 23 June 2017 05:21 p.m.
To: Resource Consent Submissions
Subject: Resource consent application submission - 596160

This resource consent application submission has been made via the Council website on **23 Jun 2017 5:21pm**. The details are listed below.

Personal information

Name Brian Miller

Address

Contact phone

Fax

Email address

Submission details

Consent number SUB-2017-43, LUC-2017-222 AND LUC-2017-223

Position I oppose this application

Wish to speak? Yes

Present jointly to hearing? No

Parts of application that submission relates to Whole application

Reasons for submission Contrary to the Otago Regional Policy Statement : Land. The regional policy statement is the overarching document that all Otago Councils must adhere to. Contrary to both the current District Plan and the proposed 2GP. There should be no more residential building in Outram until a proper sewage system is installed to replace the present septic tank system.

Desired decision Decline the application.

Privacy statement acknowledged Yes

Supporting documents

No file uploaded - file name

No file uploaded - file name

Lorna Jackson

From: Lorna Jackson
Sent: Friday, 23 June 2017 09:49 a.m.
To: Lorna Jackson
Subject: FW: Resource consent application submission - 596028
Attachments: Notified-Resource-Consent-Application-SUB.pdf

From: patscott_2000@yahoo.com [mailto:patscott_2000@yahoo.com]
Sent: Thursday, 22 June 2017 9:21 p.m.
To: Resource Consent Submissions
Subject: Resource consent application submission - 596028

This resource consent application submission has been made via the Council website on **22 Jun 2017 9:22pm**.
 The details are listed below.

Personal information

Name Patricia Scott

Address

Contact phone

Fax

Email address

Submission details

Consent number SUB-2017-43, LUC-2017-222 & LUC-2017-223

Position I oppose this application

Wish to speak? Yes

Present jointly to hearing? Yes

Parts of application that submission relates to To establish a residential dwelling on 1.63ha at 91 Formby St on Rural zoned land. To establish a residential dwelling on proposed Lot 9, 2.6ha, 99 Formby St, Rural Zoned land.

Reasons for submission See the supporting document.

Desired decision I wish the Council to reject the application to establish residential dwellings on the 2 lots of rural land at 91 and 99 Formby St.

Privacy statement acknowledged Yes

Non Complying Activity - 91 and 99 Formby Street - SUB-2017-43, LUC-2017-222 & LUC-2017-223

1. My name is Patricia Scott, I am a retired teacher, and a grandmother of 10. I live in Outram.

2. I am opposing this application on the general principle that the DCC, should adhere to its own District Plan, especially where permitting non complying activities could set a precedent. It also has a commitment to protect high class soils which it should uphold

Section 4 of the District Plan - Sustainability section - objectives

4.2.1 Enhance the amenity values of Dunedin.

4.2.2 Ensure that the level of infrastructural services provided is appropriate to the potential density and intensity of development and amenity values of the area.

4.2.3 Sustainably manage infrastructure.

4.2.4 Ensure that significant natural and physical resources are appropriately protected.

4.2.5 Provide a comprehensive planning framework to

manage the effects of use and development of resources.

3. The subdivision of rural land into sites smaller than 15.0ha is a non-complying activity under rule 18.5.2, and the establishment of new houses on sites with less than 15.0ha of rural-zoned land is non-complying activity pursuant to Rule 6.5.7(i)

3. I am reluctant about opposing the application because I realise the applicant has tried to sell the property as a whole and has failed to do so. I can understand that in her retirement she wants to realise her assets, and is hoping this new proposal will allow her to do so.

4. Land owners may indeed wish to realise their assets when they retire. However this does not mean the DCC should consider that a legitimate reason to make exceptions to the District Plan, a plan which has been developed after much consultation. If this were to become an accepted reason for rezoning, ie to enable landowners to inflate the value of their land, then we could see large sections of the Taieri Plain subdivided for housing.

5. While I do not agree with the earlier decision of the DCC to zone more land in Outram for residential development I accept that is a fait accompli. So because the land fronting Formby St is already zoned residential and the size of the sections, near enough comply with the zoning rules, **I am not opposing the subdivision of Lot 2 into 1-8 sections fronting Formby St**

6. I am more concerned about the establishment of a residential dwelling on 1.63ha, at 91 Formby St on

predominantly Rural-zoned land and the establishment of a dwelling on Lot 9, 2.6ha on Rural zoned land fronting Huntly Road.. The rural zoning of this land reflects its potential for food production, especially as the soils are high class and historically it was used for market gardening. If this non-complying application were to be granted, with each block having a generous building platform, it is most unlikely the land would be used for food production in the future. **My submission is that the DCC reject the application for dwellings on the 2 rural-zoned lots.**

7. Rule 4.2.2 requires the Council to ensure that the level of infrastructural services provided is appropriate to the potential density and intensity of development and amenity values of the area. The Council does not provide wastewater and sewerage infrastructure to Outram residences. Does the Council know the capacity of the residential land to continue to process the wastewater and sewage going into septic tanks? Does it monitor the situation so it knows how well this is working for the present residential population. There is likely to be seepage of waste water, nutrients and gut pathogens into the soil and the Taieri river. Allowing new residential development in Outram will put additional stress on the soil and the river. The consequences of further residential development could eventually lead to a proposal for the DCC to build a sewerage system for Outram, connected to the city's sewerage system.. However if this were to happen it would increase the pressure for more residential development and the loss of more rural land.

8. If this application is granted it sets a precedent. If it is done for one then it can be done for others and the valuable high class soils on the Taieri will gradually be overtaken by housing.

9. An example of this is the further resource consent application to build 15 houses on approx 8ha of rural land in Holyhead St, also previously used for market gardening. This was declined in 2013 by the DCC, but the decision was overturned by the Environment Court in 2015. and is again being advertised.

10. Each application is considered separately but together they have a cumulative effect on the amenity values, the soil and water quality of the township, and the cumulative loss of high class soils.. The original decision of the DCC hearing committee on the rezoning of Holyhead St (Plan Change 14) quoted the relevant sections of the RMA section 5- : *it should allow the local community to provide for its wellbeing, health and safety while sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations (s5(a)), safeguarding the life-supporting capacity of air, water, soil, and ecosystems (s5(b)) and seeking to avoid, remedy or mitigate any adverse effects of activities on the environment (s5(c)).*

In addition, section 7 requires that particular regard be given to the efficient use and development of natural and physical resources (s7(b)); the maintenance and enhancement of amenity values (s7(c)); and the maintenance and enhancement of the quality of the environment (s7(f)). The hearing committee went on to say : *Residential development will remove the ability to productively use the high class soils for present or future generations. While the Taier iPlain features large tracts of productive soils, and the subject area is small (6.7 ha), development within the wider area is cumulatively diminishing the productive potential. The proposal, along with other similar developments, will reduce the life-supporting capacity of the soil and its potential to meet the needs of future generations. We do not consider that the lack of economic use for the land in recent years will necessarily be the case in the future.(my emphasis)*

11. This last point referring to the future use of the land on the Taieri Plain is very significant at this time in our history. We live at a time of great change. The whole world faces real threats, - climate change, resource (oil) limitations, food security, to mention three. The DCC has a responsibility, to present and future generations, to ensure our communities and city have food security.

12. The Taieri Plain was for many years a big supplier of fruit and vegetables to the Dunedin population with many market gardens and orchards. Many factors have influenced the decline in market gardening and orchards including the rise of supermarkets, the loss of the auction system, and the increase in the price of land due to dairying and demand for housing. As growing food was usually a family business, the loss of market gardening has also led to a loss of skills.

13. At present Dunedin is largely dependent on importing fresh produce from Christchurch and further North. An earthquake or land slips on SH1 and the railway could put the delivery of fresh produce to the city at risk for weeks. The future of oil is uncertain and long distance transport is a source of undesirable carbon emissions which could be subject to carbon tax so increasing the price of food. It would seem prudent that as a city we plan for a secure supply of fresh produce grown locally.

14. In the last decade small groups have taken the initiative to increase the supply of local food with the development of community gardens. Home vegetable gardening is also on the increase but individuals, restaurants and institutions - care homes and student hostels - have limited access to locally grown produce.

15. The Otago Farmers Market gives people access to fresh produce but the one remaining large local grower at the market, Steve McArthur, has sold his land, so the last local supplier of vegetables of any scale will not be there in a few months. (The other vegetable stalls are Central and North Otago growers.)

16. If resource consents to build residences on rural land less than 15.0ha in area are permitted, especially on land with the best soils around Dunedin, our food security is jeopardised.

17. It is not enough to simply turn down non-complying applications and trust market forces to develop the return to market gardening. I submit that in accordance with Section 4 of the District Plan, objective 4.2.5 the DCC develop a comprehensive planning framework to manage the use and development of the high class soils on the Taieri Plain.. Perhaps the DCC could set up a Land Trust which would lease small parcels of land to would-be growers. Citizens may well be pleased to invest in such a Trust and if the Council owns the land it ensures security.

Patricia Scott B.Sc. Dip Ed. Dip Theol.

