VARIATION 2: REQUEST FOR COMMENTS GREENFIELD REZONING SITES

GENERAL SUBMISSIONS ON GREENFIELD GROUP OF CHANGES (COMMENTS BY 11 MARCH)

All greenfield group of changes relating to Transportation

1. The following submissions have been received that relate to the entire greenfield group of changes. They are not specific to specific sites but apply broadly to all greenfield sites. General submissions relating to transport:

    - S177.008 (Generation Zero) – remove greenfield rezoning areas as they are restrictive in the transport choices they enforce as car/motor vehicle transport is required.
      Response: We support the inclusion of sites that are located close to existing services and provide for a variety of Transport options to future residents, whilst recognising the need to enable additional housing capacity through some greenfield rezoning.

    - S184.002 (Public Health Association of NZ Otago-Southland Branch) – retain general intensification (greenfield) provided that Public Transport/Active Transport (PT/AT) has been accounted for in the choice of proposed development locations, especially Greenfield development.
      Response: As per response to S177.008 above.

    - S176.001 (Angelo) – retain rezoning to residential on greenfield sites provided that the following outcomes are met: good connections to public transport
      Response: As per response to S177.008 & S184.002: - we support sites that are zoned on the basis that they have good access to public transport / enable travel choices.

    - S16.001 (Shannon) – remove changes which extend residential zoning over greenfield land due to concerns regarding transport emissions
      Response: We support sites that are zoned on the basis that they have good access to public transport / enable travel choices, which will contribute towards reducing transport emissions.

    - S122.004 (Dowden) – Amend rules so that all new dwellings built in General Residential 1 zone or Township & Settlement zone must have “ok” or better access to public transport accessibility by DCC criteria.
      Response: We support sites that are zoned on the basis that they have good access to public transport. (Note:- Our understanding is that this was one of the criteria applied by yourselves (CD) in considering the suitability of sites for development as part of the preparation of Variation 2?) .

    - S125.005 (Bus Users Support Group) – Remove rezoning of land to General Residential 1 zone or Township & Settlement zone unless all new dwellings in the new zones are able to meet the following standard for walking distance to bus stops, through optimal walking route layout or bus route extensions: Any new dwelling to be within 800m of a bus stop or 1200m of a bus stop with a rapid service
      Response: As per response to S122.004 above and accompanying note.

    - S235.001 (Waka Kotahi) – Retain the approach in Variation 2 of 'filling gaps' distributed across a wider area as it provides the opportunity to utilise existing resources and infrastructure and is likely to result in a lesser impact or create a significant change in

demand on infrastructure at specific points or locations including within the State Highway network.
Response: If I am understanding the submissions details correctly – then support**.** As I believe that 'filling gaps' refers to rezoning larger pockets of land within existing residential areas, as opposed to large scale extensions to the urban zone (or commonly referred to as 'urban sprawl'). From a transport perspective, increasing density in existing residential areas helps to make better use of existing transport infrastructure and provides new residents with better access to walking, cycling and public transport services. This typically reduces the demand of new development on the network by reducing reliance on private motor car, thereby increasing network resilience, and also reducing development costs on a per unit basis.

- S235.003 (Waka Kotahi) – Add rules for greenfield rezoning areas that are adjacent to a state highway to require that access is achieved from roads other than a state highway.
  Response: Neutral. It is considered that if access is proposed onto a State Highway, or if a development is occurring adjacent to a state highway, that this would be assessed through the resource consent process, at which time Waka Kotahi would likely be considered an affected party. In that regard, see note 6.6.3A from the 2GP. In the case of a subdivision (which is the most likely type of resource consent in respect of greenfield sites), this would at a minimum, be a restricted discretionary activity and the Council is able to consider effects on the safety and efficiency of the transport network. This would extend to the effects on the state highway network, and it is therefore expected that existing planning mechanisms already provide the control that is required to ensure effects on the state highway network are appropriately considered through the subdivision consent process. We do note, however, that Rule 8.6.3.b of the Christchurch District Plan states "Access shall not be to a state highway, limited access road or across a railway line"

  In the case of limited access roads (LARs), Waka Kotahi's approval would already be required for any new accesses or changes to existing accesses.

Note 6.6.3A - General advice

1. Approval for any work in a road, including the establishment of access to properties, must be obtained from the relevant road controlling authority. Under section 317 of the Local Government Act 1974, the Dunedin City Council is the road controlling authority for all in roads in the city, with the following exceptions:
   a. state highways are under the control of the NZ Transport Agency (NZTA), unless the NZTA has delegated control to the Dunedin City Council.
   b. government roads are under the control of the Minister of Transport.
2. Under section 51 (2) of the Government Roading Powers Act 1989, the written permission of the NZTA must be obtained prior to the commencement of any work on any state highway. Early consultation with the NZTA should be undertaken for subdivision or development proposals adjacent to, or seeking access to, state highways.
3. Where the state highway has been declared a limited access road, approval from the NZTA is required for new accesses or changes to existing accesses. The objective of this control is to protect the operation of state highway from uncontrolled property access that can affect the safety, efficiency, functionality and level of service of the state highway. Limited access roads are most commonly in areas with a heightened development pressure. The NZTA should be consulted initially with respect to development along limited access roads.

- S187.010 (Dunedin City Council) – amend the assessment rules for subdivision and multi-unit development which enable consideration of "effects on efficient solid waste management" and such further, alternative, or consequential relief as may be necessary to fully give effect to this submission. Specifically, submitter is concerns with

the safety and efficiency of the transport network, where bins obstruct accessways and carparks, topple onto the road, or cause road congestion (Objective 6.2.3).
Response: Support – the suggested amendment is considered appropriate in order to manage potential effects on the transport network, caused by an accumulation of a large number of bins on public footpaths/roadside.

- FS184.479 (ORC) – support OS122.004 to facilitate access to public transport
  Response: As per response to OS122.004.

- FS184.482 (ORC) – support OS125.005 in part so as to facilitate access to public transport.
  Response: As per response to OS125.005.

- FS184.500 (ORC) – support OS184.002 as providing for active modes of transport, and access to public transport, are important in planning developments.
  Response: As per response to OS184.002.

- FS226.12 (Southern Heritage) – support OS176 and only rezone residential on greenfield sites provided good connections to public transport are present.
  Response: As per response to OS176.001.

DELIVERABLES

2. Please review the above submissions and provide comments with respect to transportation.