

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

Under the Resource Management Act 1991 (**RMA**)

In the Matter of Hearing 4 of the Proposed Variation 2 (Additional
Housing Capacity) of the Second Generation Dunedin
District Plan – Appeals Version (**2GP**)

By **DDS Properties (2008) Limited**

Brief of Evidence of **Emma Rayner Peters**
on behalf of:

DDS Properties (2008) Limited
(Submission 242 – Requested Site 195)

Dated 12th 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.

Context & Vision:

4. This rezone site is a large tract of land in single ownership immediately adjacent to the township of Allanton. The vision for this land is to provide a range of housing choice in a way which is sympathetic and responsive to the environment and people's well being. There is the opportunity to provide for mixed housing densities with an on-site community wastewater system that will be vested in Council with appropriate management contracts in place. Residential development will include road linkage between Centre Road and State Highway 1 through the site, ecological enhancement by way of riparian and wetland planting as well as amenity planting, walking and cycling tracks and a retail and commercial centres. This vision is supported by a landscape assessment¹ and preliminary geotechnical assessment².
5. Mr Paul Rogers, director of DDS Properties (2008) Limited, sets out a detailed vision for the site in his evidence.

¹ See evidence of Mr Hugh Forsyth.

² See evidence of Mr Mark Walrond.

Submission:

6. A submission was made on behalf of DDS Properties (2008) Limited to rezone part of the land located at 774 Allanton – Waiholo Road from *Rural – Taieri Plain* to a mixture of *Township and Settlement* and *Large Lot Residential* and apply a structure plan mapped area to the site³. The landscape structure plan included with the submission is appended at Appendix 1. RS 195 contains approximately 55 hectares. Council identifies the site as RS 195.
7. A more detailed structure plan for the site has been prepared and is appended at Appendix 2.

Futher Submissions:

8. Three further submissions were received all opposing rezoning of the site:
 - Otago Regional Council (FS184 – natural hazard risk, stormwater and wastewater management).
 - Susan Browne (FS233 – loss of productive land, biodiversity, rural character & amenity, effects on 3waters infrastructure, construction effects).
 - Alan and Leanne Coombs (FS3 – loss of productive land, flooding risk, traffic effects, stormwater management, air quality).

S42a Report:

9. The reporting planner recommends: *“I consider that the rezoning of this site to residential has clear conflicts with Policy 2.6.2.1 and that the site is presently unsuitable for residential rezoning. I therefore recommend that the site remain zoned as Rural Taieri Plain.”*⁴

Policy 2.6.2.1

10. The primary mechanisms in the 2GP for rezoning land, where medium density is not sought, are Objective 2.6.2 and Policy 2.6.2.1.
11. Objective 2.6.2 *Adequate Urban Land Supply* states: *“Dunedin provides sufficient, feasible, development capacity (as intensification opportunities and zoned urban land) in the most appropriate locations to at least meet demand over the medium term (up to 10 years), while sustainably managing urban expansion in a way that maintains a compact city with resilient townships as outlined in Objective 2.2.4 and policies 2.2.4.1 to 2.2.4.3.”*

³ Original submission 242.

⁴ S42a Report page 308.

12. Policy 2.6.2.1 provides the criteria by which the district plan envisages land will be selected for residential rezoning. The criteria include⁵:

- necessary to provide at least sufficient housing capacity to meet short and medium term demand;
- no pressure on unfunded public infrastructure upgrades;
- area is suitable for rezoning with respect to specified factors;
- the zoning sought is the most suitable with respect to specified factors;
- biodiversity effects;
- effects on outstanding and significant landscapes;
- effects on natural character of coastal environment;
- access to coasts, rivers and the like;
- effects on residents' and visitors' aesthetic appreciation and enjoyment of the City with respect to specified factors;
- risk from natural hazards;
- effect on the efficiency and effectivity of public infrastructure;
- effects on a multi-modal transport network;
- Dunedin remains a compact and accessible City with resilient townships.

Council's Assessment of the Site Pursuant to Policy 2.6.2.1.

13. In Appendix 4 to the s32 report Council states: *"The following table lists sites that were assessed for rezoning but are not being proposed for rezoning in Variation 2. These sites were rejected as they do not meet (or there is insufficient information to be confident that they would be likely to meet) relevant policy assessment criteria. Having identified that a site was unsuitable for any reason, no further assessment was undertaken. Therefore, the list of reasons for rejection included in Appendix 4 is not necessarily complete, as a full assessment against all policy criteria may not have been undertaken."*

14. In relation to RS 195 the table includes the following information:

Location	Map number	Current Zone	Requested Zone	Size (ha)	Reasons for rejection
774 Allanton - Waihola Rd		Rural	T&S/LLR1/LLR2	55.19	Areas of the site are identified as being at high risk of flooding (Hazard 1). There is existing capacity in Allanton. Rezoning would not support the compact form/city policies.

15. Appendix C *Site Criteria Assessment* to the s42a report does not include any further assessment of RS 195 with respect to Policy 2.6.2.1.

⁵ See Appendix 3 for a copy of Policy 2.6.2.1.

Assessment of Site Pursuant to Policy 2.6.2.1

16. An assessment of the RS 195 against the criteria set out in Policy 2.6.2.1 is undertaken below.

Short and Medium Term Demand in Allanton

17. Policy 2.6.2.1.a states: *"...rezoning is necessary to ensure provision of at least sufficient housing capacity to meet expected demand over the short and medium term..."*.
18. The s32 report, prepared prior to February 2021, states that there is existing residential capacity in Allanton although no data of that capacity is available for assessment. The s42a report relies on this assessment stating at page 307: *"There is no information that Allanton needs such significant extra development capacity – there would appear to be capacity within the existing residential zoned areas."*
19. Council have not undertaken any data based assessment of the zone capacity within Allanton or likely has not for other townships as well despite these townships being crucial to the rural areas which dominate the area to be serviced by Dunedin City Council and its district plan.
20. There is an accepted difference between 'zoned capacity' likely what is referenced in both the s32 and s42a reports and 'market availability' of that capacity.
21. In a letter appended at Appendix 4, Mr Paul Thomson of PGG Wrightson Real Estate speaks to the shortage of residential sections in the greater Dunedin and Taieri areas.
22. This criterion is met. There is a clear demand for more residential zoned land to be made available to the market in Allanton.

Public Infrastructure and Multi-Modal Land Transport Network

23. Policy 2.6.2.1.b states: *"...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 Policy 2.6.2.1.d.ix states: *"...public infrastructure networks operate efficiently and effectively and have the least possible long term cost*

burden on the public (Objective 2.7.1)..." and Policy 2.6.2.1.d.x states: "...the multi-modal land transport network, including connections between land, air and sea transport networks, operates safely and efficiently (Objective 2.7.2)..."..

24. The s42a report states at page 308: *"Rezoning the site would result in inefficient and ineffective public infrastructure through needing to expand servicing at this location. For this reason, I consider rezoning the site to residential conflicts with Policy 2.6.2.1.d.ix."*
25. The issues of effects on 3waters infrastructure and increased traffic congestion on SH1 were raised in further submissions.
26. No assessment by 3 waters of RS195 has been included in Appendix D.5 to the s42a report.
27. The areas zoned *Large Lot Residential* can be self serviced with respect to wastewater. For the areas zoned *Township and Settlement* there are three likely technically feasible solutions to wastewater all of which involve a reticulated system and the treatment of wastewater on the site. The difference between the technical solutions is whether: (a) the treated wastewater is discharged to a constructed wetland within RS 195 located out of any mapped flood hazard area; or (b) the treated wastewater is pumped via the existing reticulated wastewater system in Allanton with the ability for the treated wastewater to be held to be pumped at off-peak times if there is an issue with capacity during peak times; or (c) a combination of the two. The level of treatment may differ dependent on which solution is utilised.
28. Allanton is self-serviced with respect to potable water and this is a feasible solution for residential development within RS 195. This method of potable water supply does not prohibit any future potable water reticulation to Allanton and RS 195.
29. Stormwater in the first instance will be detained from roof surfaces to tank for use as potable water. Overflow from tanks and stormwater from impremeable surfaces will be attenuated. The structure plan allocates areas for stormwater attenuation. It is anticipated that performance standards attached to the structure plan will require a storm water management plan be provided at the time of subdivision.
30. Access to RS 195 will be via Centre Road and SH1 both of which are classified as

Strategic in the district plan roading hierarchy. These roads are capable of absorbing the additional traffic volume resulting from the development of RS 195.

31. In a memorandum appended at Appendix 5, Mr Grant Fisher of Modal Consulting Limited has provided preliminary design parameters for the intersection of the site road with SH1. The precise location of the site road intersection to SH1 is a matter that can be left to the time of subdivision.
32. Any transport infrastructure upgrades, for example the slip lane into RS 195 from Centre Road, roading within RS 195, pedestrian and cycleway within RS 195 would be paid for by the developer who would then vest roading infrastructure in Council with the ongoing maintenance of that roading infrastructure being paid for by the rate take from residential development within RS 195.
33. The development of RS 195 will not have an adverse impact on the multi-modal land transport network particularly given the measures to mitigate any reverse sensitivity effects with respect to the operation of the SH1 and the Main South Railway Line – see paragraphs 47 – 50 below for further detail.
34. These criteria can be met by RS 195.

Land Suitable for Rezoning?

35. Policy 2.6.2.1.c states: *“...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...”*.
36. The s42a report states at page 307: *“Although close to the edge of Allanton, the site is distant from centres and facilities, and would require a significant commute for many to Mosgiel or Dunedin for work. There is extremely limited public transportation in Allanton.”* At page 308 the reporting planner states: *“I also consider rezoning the site to conflict with Policy 2.6.2.1.c as it is located relatively distant to public transport, centres and other community facilities.”*
37. Table 1 below contains an assessment of RS 195 against the factors specified in Policy 2.6.2.1.c.

Table 1: Assessment of RS 195 Against Policy 2.6.2.1.c – Desired Site Characteristics.

Desired Characteristic	Assessment of RS 195
Topography 'not too steep'	The areas of the RS 195 proposed for residential development are located on land with less than 15 degrees or will be supported by detailed geotechnical investigations and engineering at the subdivision stage. RS 195 has this characteristic.
Close to township with shortage of capacity	RS 195 is located on the edge of Allanton. There is a shortage of zoned capacity available to the market in Allanton. RS 195 has this characteristic.
Public transport services 'currently serviced or likely to be easily serviced'	Mr Paul Rogers has undertaken preliminary investigations into commuter services for RS 195 based on a full residential development. It is likely that some solution can be provided. A park and ride/share facility can included in RS 195. RS 195 potentially has this characteristic.
Close to centres	'Centre' is defined in the district plan as: " <i>Principal, Suburban, Rural, Neighbourhood, Neighbourhood Convenience and Neighbourhood Destination centres zones.</i> " The <i>Rural Centre</i> zone at Outram is approximately 8km away. The <i>Neighbourhood Convenience Centre</i> zone at Mosgiel is approximately 8.5km away. The <i>Principle Centre</i> zone at Mosgiel is approximately 9.3km away. However, RS 195 includes a retail / commercial area that will operate as a centre. RS 195 will exhibit this characteristic.
Close to existing community facilities	Primary schools are located at East Taieri and Outram which are located approximately 8.1km and 8.3km respectively from Allanton. The closest highschool is located in Mosgiel. There are school bus services available. There is a public green space of approximately 1.7ha including tennis courts located within Allanton at 30 Castleton Street. The public pool in Mosgiel is currently being redeveloped. Currently, the closest GP clinics are in Outram and Mosgiel. There is a public library in Mosgiel. There is a community hall in Allanton. There are limited community facilities within Allanton. RS 195 does not currently exhibit this characteristic.

38. Policy 2.6.2.1.c states that a site is suitable for rezoning if it has all or the majority of the characteristics therein listed. 'Majority' is typically interpreted to mean: '*a number or percentage equaling more than half of a total*'⁶. The analysis in Table 1 above shows that RS 195 meets three possibly four of the five desired characteristics which represents a majority. This criterion is met.

Landscape, Rural Character and Visual Amenity

39. Policy 2.6.2.1.d.i states: "...the character and visual amenity of Dunedin's rural environment is maintained or enhanced (Objective 2.4.6)..." and Policy 2.6.2.1.d.vii states: "...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

⁶ Source: Merriam-Webster online dictionary: <https://www.merriam-webster.com/dictionary/majority>

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)...”.

40. Policies 2.6.2.1.d.iv and d.v are not relevant to RS 195 as it is not located within a landscape overlay zone or within the coastal environment.
41. The issue of loss of rural character and amenity including effects on privacy and quality of life is raised in further submissions.
42. In his evidence, Mr Hugh Forsyth, landscape architect for the the submitter, concludes: *“My conclusion is that the longer term, 10+ years, effects will both be moderate-low on this same scale. In my view the proposal has a lot to recommend it on environmental and amenity grounds and I would recommend the rezoning sought be approved to enable its establishment.”*
43. Zoning to a mixture of *Township and Settlement* and *Large Lot Residential* is sought. This zoning is the most suitable given the landscape characteristics of RS 195 and the locale. This criteria is met.

Protection of Land, Facilities and Infrastructure Important to Economic Productivity & Social Wellbeing

44. Policy 2.6.2.1.d.ii states: *“...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...”.*
45. The issues of loss of rural productive land and effect on SH1 are both raised in further submissions.
46. There are no mapped areas of *High Class Soils* within RS 195 and RS 195 is not considered to be land that is highly productive for the reasons set out in the

letter from Mr Kevin Wilson of Abacusbio appended at Appendix 6.

47. RS 195 is located between *Designation 463* being *SH1 – Mosgiel Interchange to Waipori River* and *Designation 419* being the *Main South Railway* both of which are key transportation routes. This is one of the factors that makes the site attractive for development provided that reverse sensitivity effects with respect to the operation of these transportation routes can be avoided, remedied or mitigated.
48. The structure plan shows that there will be wetland, amenity planting, walking/cycling tracks or utility areas along the boundary with the railway line. In addition, there will be a performance standard ensuring that houses are set back a required distance from the boundary of RS 195 with *Designation 419*.
49. The primary entrance to RS 195 is proposed to be from a slip lane on Centre Road. The submitter informs that development is most likely to start from this end of RS 195. There will be a link road through to SH1. The intersection of the link road with SH1 will comply with design standards required by Waka Kotahi.
50. It is anticipated that a performance standard will require a noise assessment is undertaken in relation to both designations prior to subdivision with any recommendations included in the subdivision design. Noise mitigation measures with respect to the operation of SH1 will include:
 - A landscaped pedestrian/cycle access set back from the boundary with SH1;
 - No buildings to be located in 'buffer areas' – to be defined by a noise assessment;
 - Construction treatments for dwellings within 'effects areas' as defined by a noise assessment.
51. This criteria is met.

Biodiversity

52. Policy 2.6.2.1.d.iii states: *“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...”*.

- 53. The issue of loss of biodiversity including habitat for birds is raised in further submissions.
- 54. The proposed development includes significant areas of riparian and wetland planting. These areas will be planted with indigenous species suitable for the locale. There will also be other areas of amenity planting. These will provide for an enhancement of the biodiversity of both the site and its immediate locale.
- 55. This criterion is met.

Access to Waterbodies, Coastlines and Other Parts of the Natural Environment

- 56. Policy 2.6.2.1.d.vi states: *"...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)..."*.
- 57. There is no access through the site to Taieri River due to the Main South Railway line. There is the potential to create access to the Taieri River via an existing railway underpass if the health and safety issues can be managed with respect to restricting access when there is a flooding risk. Several pedestrian/cycle access routes around RS 195 are proposed which will provide access past various wetland, riparian and amenity planting areas.
- 58. This criterion is met.

Natural Hazards Risk

- 59. Policy 2.6.2.1.d.viii states: *"...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)..."*.
- 60. The s42a report states at page 308: *"There is a high risk of flooding, as evidenced by the Hazard 1 (flood) Overlay Zone over large parts of the site. Residential development is a non-complying activity within this overlay and a prohibited activity in a Hazard 1A (flood) overlay zone...indicating the incompatibility of residential zoning in these areas."*
- 61. The issue of natural hazard risk including flooding was raised in further submissions.
- 62. The mapped flood hazard areas are shown in Figure 1 below. The areas marked

with a red 'X' in Figure 1 does not form part of RS 195.

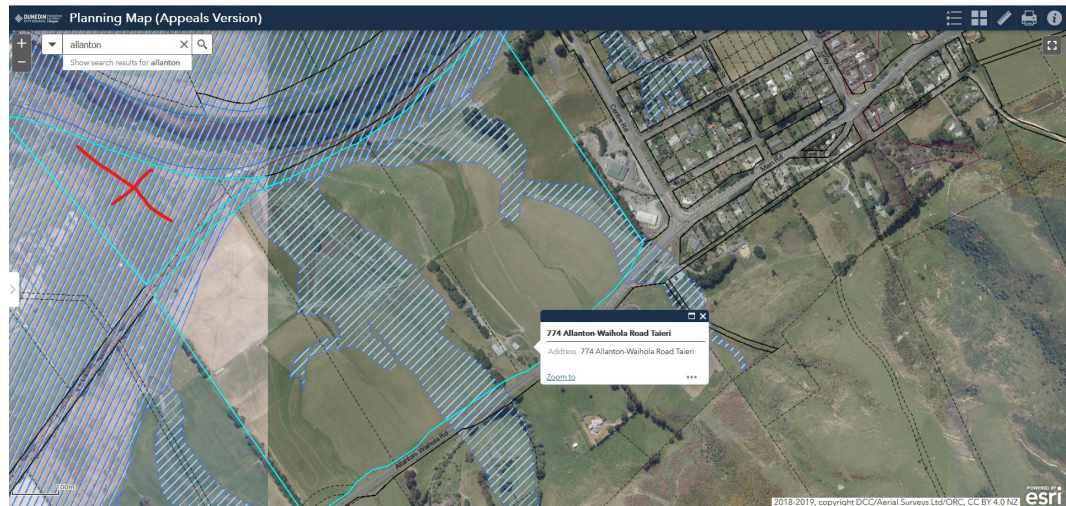


Figure 1: Flood Hazard Overlays on RS 195 – Area Marked with a Red 'X' is not part of RS 195.

63. No residential development is proposed within the Hazard 1A (flood) Hazard Overlay zone which is shown in Figure 1a below – again the area marked with a red 'X' does not form part of RS 195.



Figure 1a: Area of RS 195 within a Hazard 1a (flood) Overlay Zone – Area Marked with a Red 'X' is not part of RS 195.

64. The submitter engaged Geosolve to prepare a preliminary geotechnical assessment for residential land use with respect to natural hazards (slope stability, seismic hazard, liquefaction, flooding risk) for RS 195⁷. This preliminary assessment involved a visual appraisal and desktop analysis but no sub surface investigations.
65. The Geosolve report concluded: *"...the property is considered to be suitable for residential land use and we consider that there is a low risk of slope instability, liquification or flood hazard affecting the residential zones, provided that standard best practice is adopted, such as obtaining site-specific geotechnical advice for building design and earthworks, engineered retention of cuts,*

⁷ Copy appended at Appendix 4.

appropriate disposal of stormwater and wastewater and cut-off drains upslope of developments where required.

Additionally, no development on slopes with angles greater than 15° is recommended initially, unless supported by detailed geotechnical reporting. The currently proposed residential development areas appear to meet this recommendation.

...standard residential activity in the vicinity of the Titri Fault is expected to be considered a permitted activity.

Some further consideration will be required for any development within mapped flood hazard zones, as well as areas designated in Domain B and C in regard to liquefaction hazard. This should be confirmed when [subdivision] scheme plans and building platform locations are finalised.

In general stormwater should be directed to the gullies below via carrier pipes and should not be discharged to the slopes without geotechnical approval. Wastewater dispersal sites should be selected by the system designer and should be directed to the gentlest available slopes only.

We recommend that future building development should at a minimum be informed by geotechnical good ground check in accordance with NZS3604 to enable appropriate foundation advice. Depending on the type of dwelling adopted, further investigations may also be required, e.g. to assist with retaining wall design etc.

If significant earthworks are proposed for the subdivision works, (e.g. cuts greater than 1.5 m deep or engineered fills or retaining walls), or if pavement design is required then geotechnical assessment is recommended as part of subdivision planning...All fill that is utilised as bearing for foundations or vehicle loads should be placed and compacted in accordance with the recommendations of a specific standard such as NZS 4431:1989, and certification provided to that effect."

66. It is anticipated that a performance standard will be attached to the structure plan requiring further subsurface investigations to be carried out at the subdivision design stage.

67. This criterion is met.

Compact & Accessible City

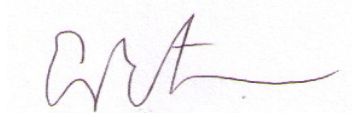
68. Policy 2.6.2.1.d.xi states: *“Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion. Urban expansion only occurs if required and in the most appropriate form and locations (Objective 2.2.4)...”*.
69. The s42a report states at page 307: *“Rezoning relatively remote pockets of land conflicts with Policy 2.6.2.1.d.xi, which requires that Dunedin stays a compact and accessible city. There is no information that Allanton needs such significant extra development capacity – there would appear to be capacity within the existing residentially zoned area.”*
70. A clear need for further residential zoned capacity available to the market has been demonstrated for Allanton – see paragraphs 19 – 21 above.
71. Council has incorrectly interpreted Policy 2.6.2.1.d.xi when assessing RS 195. This policy cannot be applied in a 'Dunedin City centric' way. Council has failed to place emphasis on *'...with resilient townships...'* when assessing RS 195.
72. The district over which Dunedin City Council has jurisdiction is predominantly rural. The townships are not Dunedin City and service a large rural area by providing places for people to live who work in the rural environment or for businesses supporting activities undertaken in the rural environment.
73. Townships such as Allanton often provide a place for these workers to own their own property at a more affordable price and raise their families closer to schools and facilities than would otherwise be the case. Others chose to live in townships like Allanton for reasons of personal preference and may commute to jobs in other locations including south of Allanton for example, to the correctional facility and existing industrial activities at Milburn; or inland to the Dunedin City Airport, farms or forestry.
74. Clutha District Council has in recent times zoned approximately 250 hectares of land at Milburn between the Main South Railway line and SH1 *Industrial Resource Area*. Calder Stewart has plans to establish an inland port at the site with industrial buildings and land available for rent and sale. This will create more jobs within a short commute of both Outram (35km) and Allanton (30km). There is a shortage of housing in both Milton and Waiholo which the Dunedin City Council can capitalise on by rezoning RS 195 residential.

75. The Government has a target to increase zero-emissions vehicles to 30% of the light fleet by 2035. It is pushing the uptake of electric and low emissions vehicles in the private car fleet by subsidising the purchase of new electric and low emissions vehicles. Given its proximity to SH1 and the gradient of SH1 between Allanton and Dunedin and Allanton and Milburn, RS 195 is ideally suited to commutes by electric cars.
76. This criterion is met.

Conclusion

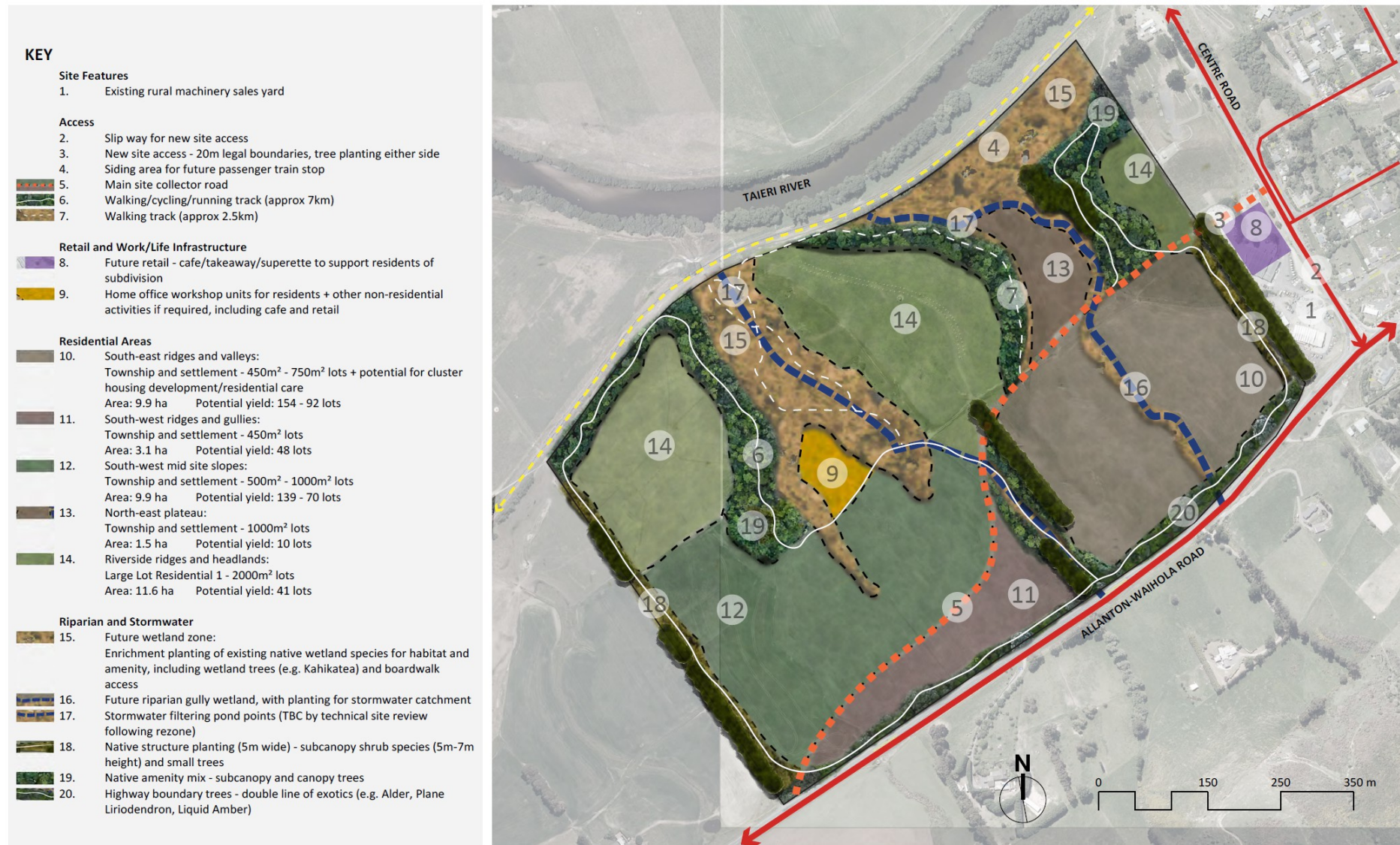
77. Council has incorrectly applied Policy 2.6.2.1 in recommending that site be declined for residential rezoning. This has been compounded by the lack of thorough assessment of RS 195 against the rezone criteria contained in Policy 2.6.2.1.
78. Interpretation of Policy 2.6.2.1 cannot be undertaken in a Dunedin City centric way. Growth must be provided for in townships so that the large rural area within Dunedin City District can be supported by those townships. Allanton is one such township requiring residential expansion.
79. The analysis of RS 195 against the rezone criteria contained in Policy 2.6.2.1 clearly demonstrates that RS 195 is an ideal site for rezoning residential.

Dated this 12th day of August 2022



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

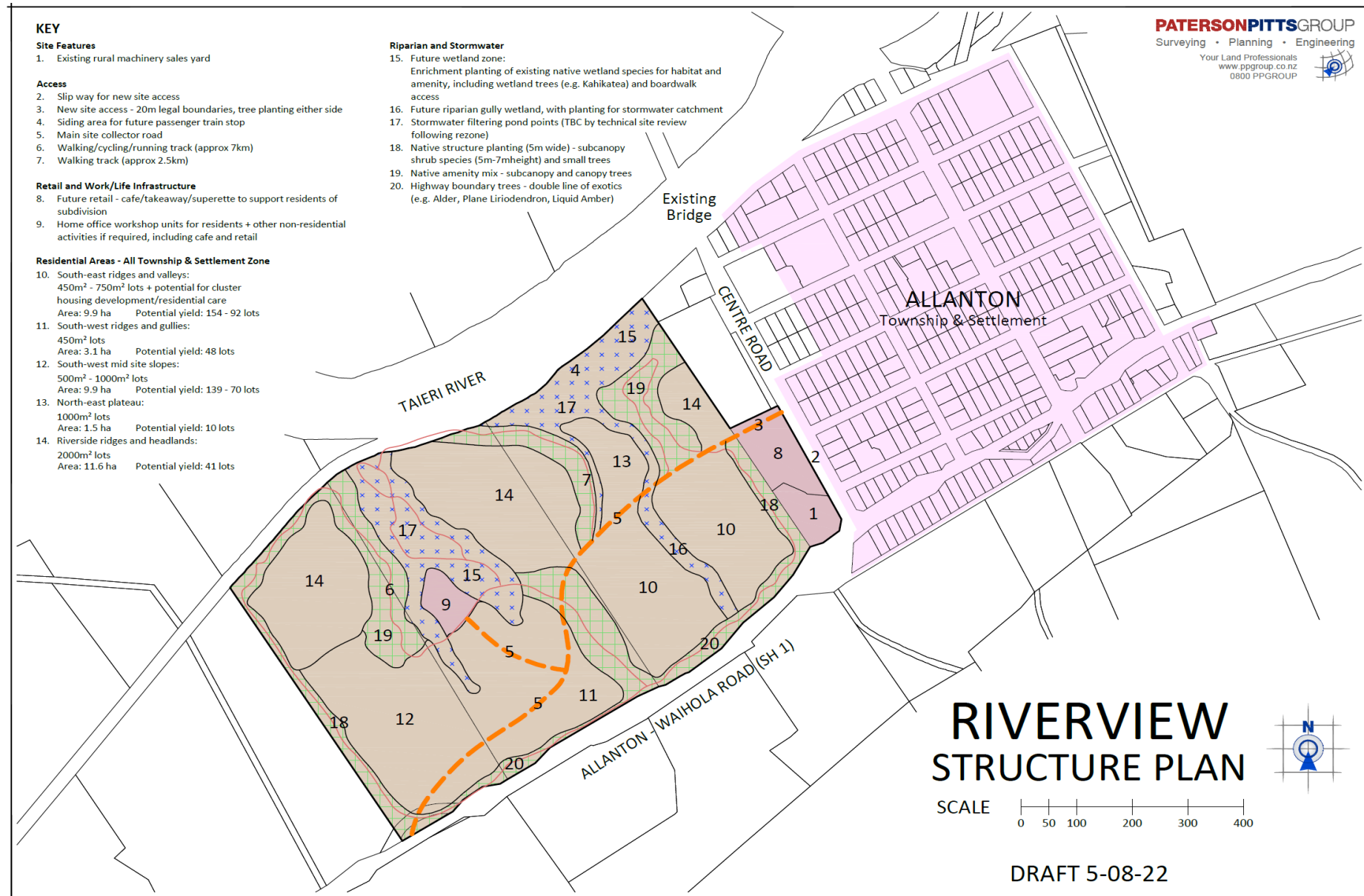
Appendix 1: Landscape Structure Plan Included with Submission 242.



774 Allanton-Waihola

LANDSCAPE PROPOSAL

Appendix 2: Structure Plan. NB: Note 20 should refer to 'Highway Boundary Planting – Natives of Appropriate Size'.



Appendix 3: 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 4: Letter from Real Estate Agent.

10 August 2022

To whom it may concern

Re :774 Allanton-Waihola Highway proposed residential subdivision

Currently there is a shortage of sections in the greater Dunedin and Taieri Areas. We believe this potential subdivision would affectively be an extension of Allanton township with some added recreational areas on the lower side towards the river and wetlands areas. The younger generation of Otago are screaming out for a Real Estate start in their life and with this land area being only a short commute to Dunedin City and handy to Mosgiel shopping facilities, we believe this potential subdivision would be a fantastic affordable option for families. This Allanton area also services families working in the Waihola, Milton and South Otago country areas where they can still be close enough to Dunedin for schooling and university to satisfy the whole family's requirements. With the upcoming hospital build along with other large commercial projects in Dunedin this further emphasizes the upcoming demands from trades people for housing and sections handy to Dunedin. The other advantage with this area is the property is of an easy contour therefore the foundations and retaining wall costs are minimal compared to some of the other areas in Dunedin City and hills around Mosgiel.

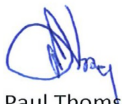
There is only one thing that is going to help the housing affordability in New Zealand and that is as simple as supply of more sections and currently there has been a major shortfall in this area.

Any sections that have come on to the market have been snapped up very quickly if they are competitively priced.

We have numerous people on our books looking for both affordable residential sections and small rural residential bare land lifestyle blocks to build their house in this area.

The recent sale of sections in Rodeo Drive is testament that families especially are happy to live in semi-Rural areas where section values are more affordable and generally have larger more family friendly section sizes, we believe the proposed subdivision addresses these concerns and provides a balance to what has been offered in Mosgiel and Outram.

Yours Sincerely



Paul Thomson

Real Estate Sales Consultant



Helping grow the country

PGG Wrightson Real Estate

PGG Wrightson Real Estate Ltd

Real Estate Agent, REAA 2008

16 Factory Road, Mosgiel
Private Bag 1961
Dunedin 9054
New Zealand

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Helping grow the country

Memorandum

To: Emma Peters, Sweep Consultancy

From: Grant Fisher, Modal Consulting Limited

Date: 1 August 2022

Subject: State Highway 1 Auxiliary Lane – Allanton, Dunedin

Background

Modal Consulting have been asked to provide general design guidance for an intersection treatment with auxiliary turning lanes to enable vehicle access to a proposed development site immediately to the west of the Allanton township, on the northern side of State Highway 1. The location of the site is shown in Figure 1, below.



Figure 1 – Development site location

Design Parameters

Auxiliary turning lanes are the minimum basis of design that should be provided for a new intersection to the site from State Highway 1. The design considerations for auxiliary turn treatments are contained within the Austroads Guide to Traffic Management - Part 6: Intersections, Interchanges and Crossings Management, and Part 4A: Unsignalised and Signalised Intersections. Figure 2 shows the general layout of auxiliary lanes for left and right turning traffic, and any detailed design should be based on this in the first instance. Figure 3 shows the various components making up each turning lane, where deceleration to a stop or turning speed is required.

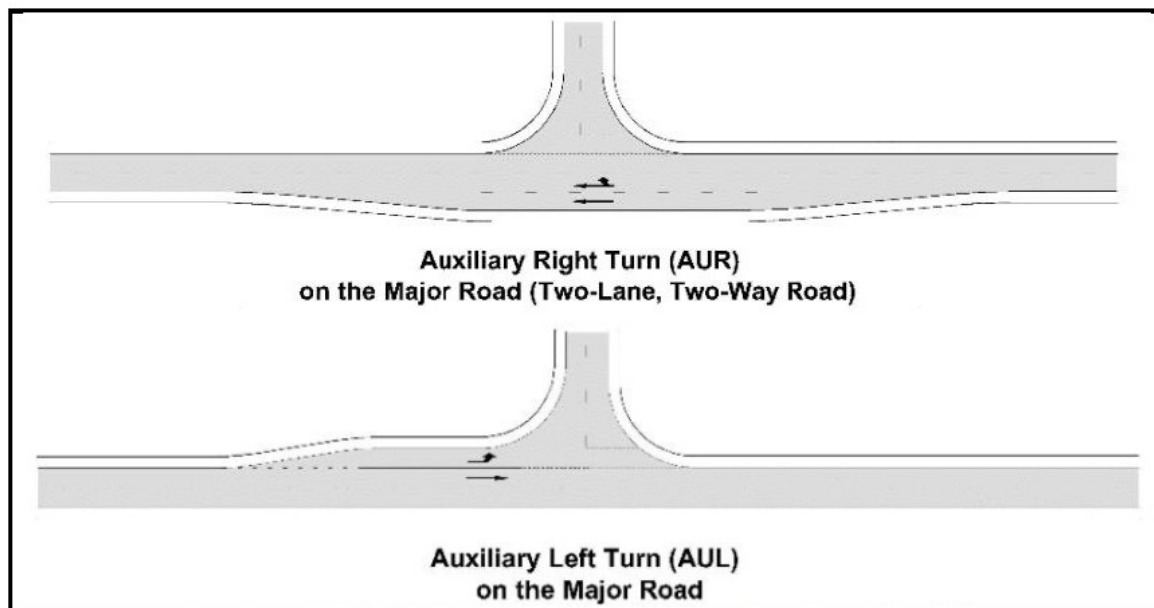


Figure 2 – Typical auxiliary left and right turn lane layouts (from Austroads Part 4A).

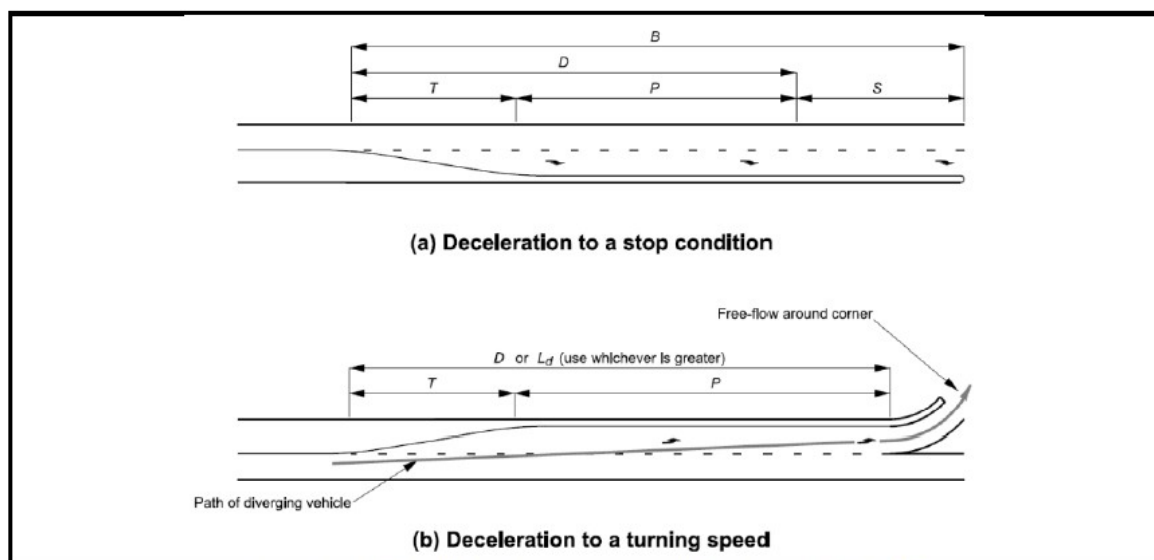


Figure 3 – Auxiliary left turn lane components (from Austroads Part 4A).

The following assumptions have been made in preparing this memo:

- Design speed of the approach road is 100km/h.
- Design speed of the exit curve for the left turn (free-flow around the corner) is 30km/h.
- The right turn auxiliary lane is designed for deceleration to a stop.
- Diverge lane width is 3.5m.

Based on design guidance within Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections, the total length of each auxiliary lane is:

- Left turn lane for deceleration to a turning speed is 140m including taper.
- Right turn lane for deceleration to a stop is 155m including taper.

Both of these auxiliary lane treatments will be subject to detailed design of the proposed intersection layout. As part of design investigations it may be appropriate to provide additional channelisation, though this is considered to be a detailed design matter that can be undertaken as part of normal subdivision consent requirements. Pavement markings should be in accordance with MOTSAM as shown in Figure 4, below.

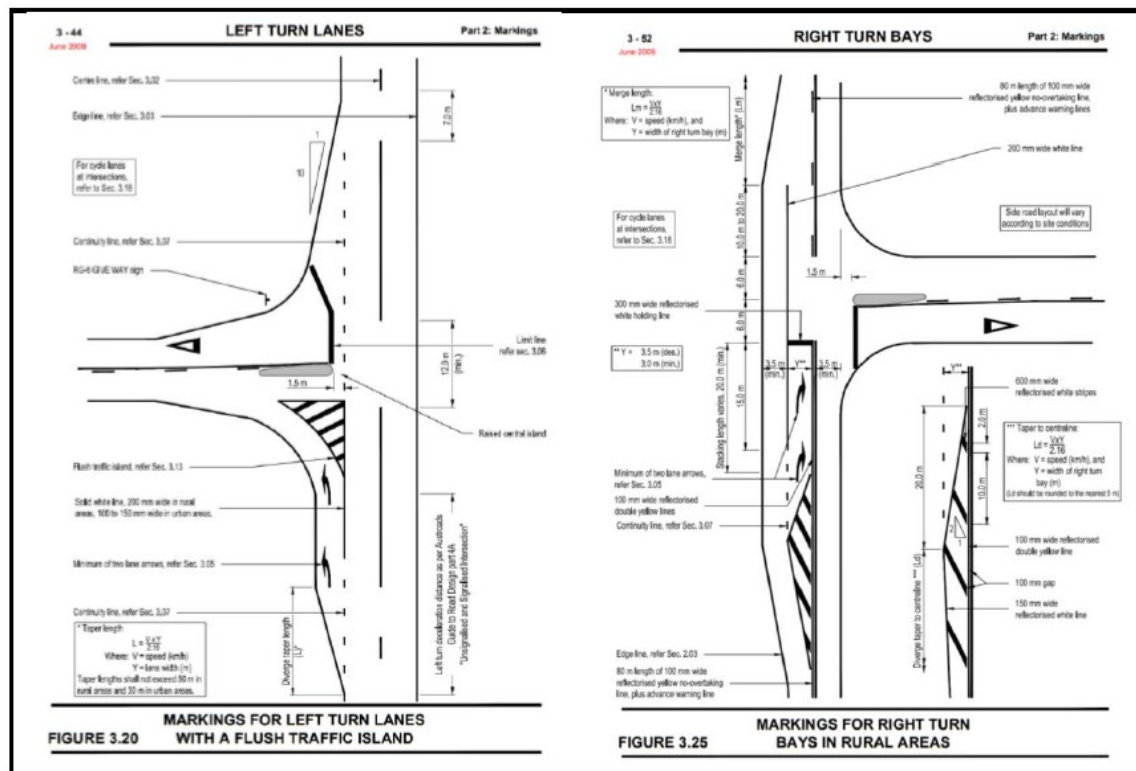


Figure 4 – MOTSAM pavement markings for left and right turn auxiliary lanes.

Appendix 6: Letter from Abacusbio.



August 2, 2022

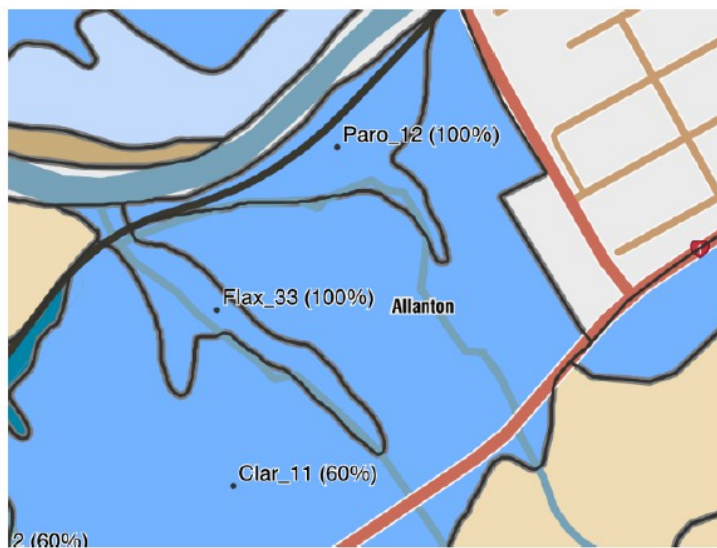
Paul Rogers
175 Loan metal road
Momona 9073

Dear Paul,

The purpose of this document is to highlight suitable agricultural land use options for your property located at Allanton on State highway one – requested site RS-195.

Soil type

Paroa (Paro_12), Flaxton (Flax_33) and Claremont (Clar_11) soils located on the property all belong to the Gley or Pallic soil order of the NZ classification¹. Gley/Pallic soils are formed from fine silt material, are poorly drained and are strongly impacted by waterlogging through winter and spring and are vulnerable to severe drying through the summer months. This land also has rolling topography making it more vulnerable to nutrient/sediment loss to open water ways when ploughed for cropping or more intensive management options.



Land use capability

According to land use capability mapping² these soils are classified as Class 3 (arable) indicating that the soil characteristics (described above) provide moderate limitations to intensive management options such as cropping, horticulture, viticulture, or intensive winter grazing. This land is more



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¹ [Maps | S-Map Online | Manaaki Whenua - Landcare Research](#)

² [Land Use Capability » Maps » Our Environment \(scinfo.org.nz\)](#)

suited/reliable for pastoral grazing, tree crops or forestry. Directly adjacent (across the road) is Class 6 land (non-arable) which has similar soil characteristics but steeper topography.

Summary

Due to the nature of the soil types and topography at RS-195 there are limitations to intensive land use options (cropping and horticulture) with significant risk around nutrient/sediment loss to open water ways adjacent to the property. For these reasons, the most suitable agricultural land use would be pastoral farming, or trees.

Regards,
Kevin Wilson