

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

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

And

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

Brief of Evidence of Emma Rayner Peters
on behalf of Meats of NZ Limited
(Submission 232 – Requested Site 200)

Dated 5th August 2022

Background:

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

Submission:

4. A submission was made on behalf of Meats of New Zealand Limited to rezone part of the land located at 489 East Taieri – Allanton Road from *Rural – Coastal* to a mixture of *Township and Settlement* and *Large Lot Residential 1* and apply a structure plan mapped area to the site¹. The landscape plan included with the submission is appended at Appendix 1. RS 200 contains approximately 8.5 hectares. Council identifies the site as RS 200. The location of RS 200 is shown in Figure 1 below.

1 Original submission 232.



Figure 1: Location of RS 200.²

Futher Submissions:

5. Four opposing further submissions were received – these are detailed at page 310 of the s42a report.

S42a Report:

6. 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 unsuitable for residential rezoning. I therefore recommend that the site remains zoned as Rural [Coastal].”*³

Policy 2.6.2.1

7. 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.”*
8. Policy 2.6.2.1 provides the criteria by which the district plan envisages land will be selected for residential rezoning. The criteria include⁴:
 - necessary to provide at least sufficient housing capacity to meet short and medium term demand;

² Source: s42a report.

³ S42a Report page 312 – reference error in s42a report which states *Rural – Taieri Plain* in this sentence.

⁴ See Appendix 2 for a copy of Policy 2.6.2.1.

- 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 effectiveness 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.

9. 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."*

10. In relation to RS 200 the table includes the following information:

Location	Map number	Current Zone	Requested Zone	Size (ha)	Reasons for rejection
489 East Taieri-Allanton Road, Allanton	8	Rural	T&S/LLR1/LLR2	44.67	Parts of the site are very steep. There is existing capacity in Allanton and rezoning would not support the compact form/city policies.

11. Appendix C *Site Criteria Assessment* to the s42a report includes assessment of RS 200 with respect to Policy 2.6.2.1.⁵

Assessment of Site Pursuant to Policy 2.6.2.1

12. An assessment of the RS 200 against the criteria set out in Policy 2.6.2.1 is undertaken below.

⁵ See Appendix 3 for copy of s42a Appendix C.30.

Short and Medium Term Demand in Allanton

13. 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...”*.
14. 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.”*
15. Council have not undertaken any data based assessment of the zone capacity within Allanton and 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.
16. There is an accepted difference between 'zoned capacity', likely what is referenced in both the s32 and s42a reports, and the 'market availability' of that zoned capacity. There is a demonstrated shortage of zoned capacity available to the market in Allanton with more demand than can be satisfied. This criteria is met.

Public Infrastructure and Multi-Modal Land Transport Network

17. 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)...”*.
18. 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.”

19. The issues of effects on 3waters infrastructure and increased traffic congestion on SH1 and to/from the site were raised in further submissions.
20. Assessment by 3 waters of RS 200 has been included in Appendix D.5 to the s42a report.
21. Allanton is self-serviced with respect to potable water and this is a feasible solution for residential development within RS 200. This method of potable water supply does not prohibit any future reticulated supply to Allanton and RS 200 of potable water.
22. The areas zoned *Large Lot Residential* can be self-serviced with respect to wastewater. A high level assessment by 3 waters suggests connecting to wastewater supply in Allanton is feasible. Subdivision performance standards require that it is demonstrated that wastewater can be dealt with appropriately either by way of connection to reticulated service or by on-site wastewater treatment and dispersal to ground.
23. 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 within RS 200. It is anticipated that a performance standard attaching to the structure plan will require a storm water management plan bes provided at the time of subdivision.
24. Access to RS 200 from the north will be via SH1 via a one way slip lane due to the presence of 2 northbound lanes on SH1 in the vicinity of RS200. Entry to RS 200 when travelling south on SH1 and exit from RS 200 will be via Ralston Street to the existing formed intersection at Grey Street. Mr Grant Fisher of Modal Consulting Limited has provided brief comment on the design standards required for exits from SH1 – please refer to Appendix 4.
25. A performance standard can be attached to a structure plan mapped area for RS 200 requiring provision of an integrated traffic assesment prior to any subdivision resulting in residential development.
26. Any transport infrastructure upgrades, for example the slip lane into RS 200, potential formation upgrades to Ralston Street, roading within RS 200 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.

27. The development of RS 200 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 – see paragraphs 41 - 42 below for further detail.
28. These criteria can be met by RS 200.

Land Suitable for Rezoning?

29. 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...”*.
30. The s42a report states at page 311: *“Although immediately adjacent 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, and is therefore inconsistent with Policy 2.6.2.1.c. There is extremely limited public transportation in Allanton.”*
31. Table 1 below contains an assessment of RS 200 against the factors specified in Policy 2.6.2.1.c.

Table 1: Assessment of RS 200 Against Policy 2.6.2.1.c – Desired Site Characteristics.

Desired Characteristic	Assessment of RS 200
Topography 'not too steep'	The majority of RS 200 proposed for residential development is located on land with less than 12 degrees, with some between 12 and 15 degrees ⁶ . Residential development will be supported by detailed geotechnical investigations and engineering at the subdivision stage. RS 200 has this characteristic.
Close to township with shortage of capacity	RS 200 is located on the edge of Allanton. There is a shortage of zoned capacity available to the market in Allanton. RS 200 has this characteristic.
Public transport services 'currently serviced or likely to be easily serviced'	There are school bus services from/to Allanton to schools within East Taieri, Mosgiel and Dunedin. There are limited general public transport services currently available although a service could easily be run from Outram to Allanton to Mosgiel/Dunedin. RS 200 meets 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 8km away. The <i>Principle Centre</i> zone at Mosgiel is approximately 9km away. However, RS 195 proposes a <i>Rural or Neighbourhood Centre</i> as part of their submission. Provided RS 195 is rezoned, RS 200 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 located within Allanton at 30 Castleton Street. The public pool in Mosgiel is currently being redeveloped. 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 200 does not exhibit this characteristic.

32. 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'*⁷. The analysis in Table 1 above shows that RS 200 meets three of the five desired characteristics which represents a majority. This criteria is met.

Landscape, Rural Character and Visual Amenity

33. 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 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)..."*.
34. Policies 2.6.2.1.d.iv and d.v are not relevant to RS 200 as it is not located within a landscape overlay zone or within the coastal environment.
35. The issue of loss of rural character and amenity is raised in further submissions.

⁷ Source: Merriam-Webster online dictionary: <https://www.merriam-webster.com/dictionary/majority>

36. It is acknowledged that changing the zone to residential will create a change in the rural character and amenity values currently associated with the site. However, the landscape proposal incorporated with submission 232 includes landscape treatment (planting) of the boundary with SH1 which can be extended up the southern boundary of RS 200 to provide a buffer between existing dwellings in Allanton and residential development in RS 200. The landscape proposal also envisages an area of public reserve as well as several areas of biodiversity enhancement. Suitable planting can also occur on the northern boundary of RS 200 to provide visual containment of residential development within RS 200.
37. 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 200 and the locale. This criteria is met.

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

38. 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...*”.
39. The issues of loss of rural productive land and effect on SH1 are both raised in further submissions.
40. There are no mapped areas of *High Class Soils* within RS 200 but a large portion of RS 200 is covered by LUC Class 3 soils. Given the relatively small size of RS 200 and its proximity to existing residential activity, the overall loss of rural productivity would be low.
41. RS 200 is located beside *Designation 463* being *SH1 – Mosgiel Interchange to Waipori River* which is a key transportation route. This is one of the factors that makes the site attractive for development provided that reverse sensitivity effects with respect to the operation of this transportation route can be avoided,

remedied or mitigated.

42. The structure plan shows landscape treatment along the boundary of RS 200 with SH1. It is anticipated that a performance standard will be attached to the structure plan requiring affected party consent to be obtained from Waka Kotahi prior to any subdivision resulting in residential development of RS 200. In addition, it is anticipated that a noise assessment report will need to be obtained prior to any subdivision of the RS 200 for residential development and any recommendations contained in that report with respect to noise mitigation (no build buffer area, facade treatments etc in effects area) be included in the subdivision design.
43. This criteria is met.

Biodiversity

44. 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...”*.
45. Wildlands Consultants undertook an ecological assessment of the site concluding: *“The site could be rezoned to Township and Settlement (Stage 1) or Large Lot Residential 1 (stage 2) with either zoning having minimal adverse effects on indigenous biodiversity. Indigenous biodiversity could be restored at the site by planting a broad corridor of indigenous trees along the central drain.”*

46. This criteria is met.

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

47. 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)...”*.
48. This criteria is not relevant to RS 200.

Natural Hazards Risk

49. 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)..."*.
50. 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."*
51. The issue of natural hazard risk was raised in further submissions.
52. There is an area of *Hazard 3 (alluvial fan) Overlay Zone* being *Area 22 – Alluvial fans from coastal hills* which has a '**Low**' hazard risk. This area is shown in Figure 2 below.



Figure 2: Hazard 3 (Alluvia Fan) Overlay Zone on RS 200.

53. It is noted that this hazard overlay zone also lies under existing residential development in Allanton.
54. 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.
55. This criteria is met.

Compact & Accessible City

56. 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)...”.

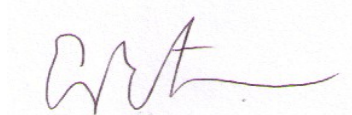
57. The s42a report states at page 311: *“Rezoning relatively remote pockets of land conflicts with Policy 2.6.2.1.d.xi, which requires that Dunedin stays a compact and accessible city. There is no information that Allanton needs such significant extra development capacity – there would appear to be capacity within the existing residentially zoned area.”*
58. There is a demonstrated need for further residential zoned capacity available to the market in Allanton.
59. Council has incorrectly interpreted Policy 2.6.2.1.d.xi when assessing RS 200. This policy cannot be applied in a 'Dunedin City centric' way. Council has failed to place emphasis on '*...with resilient townships...*' when assessing RS 200.
60. 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.
61. 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.
62. 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 200 residential.
63. 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 200 is ideally suited to commutes by electric cars.

Conculsion

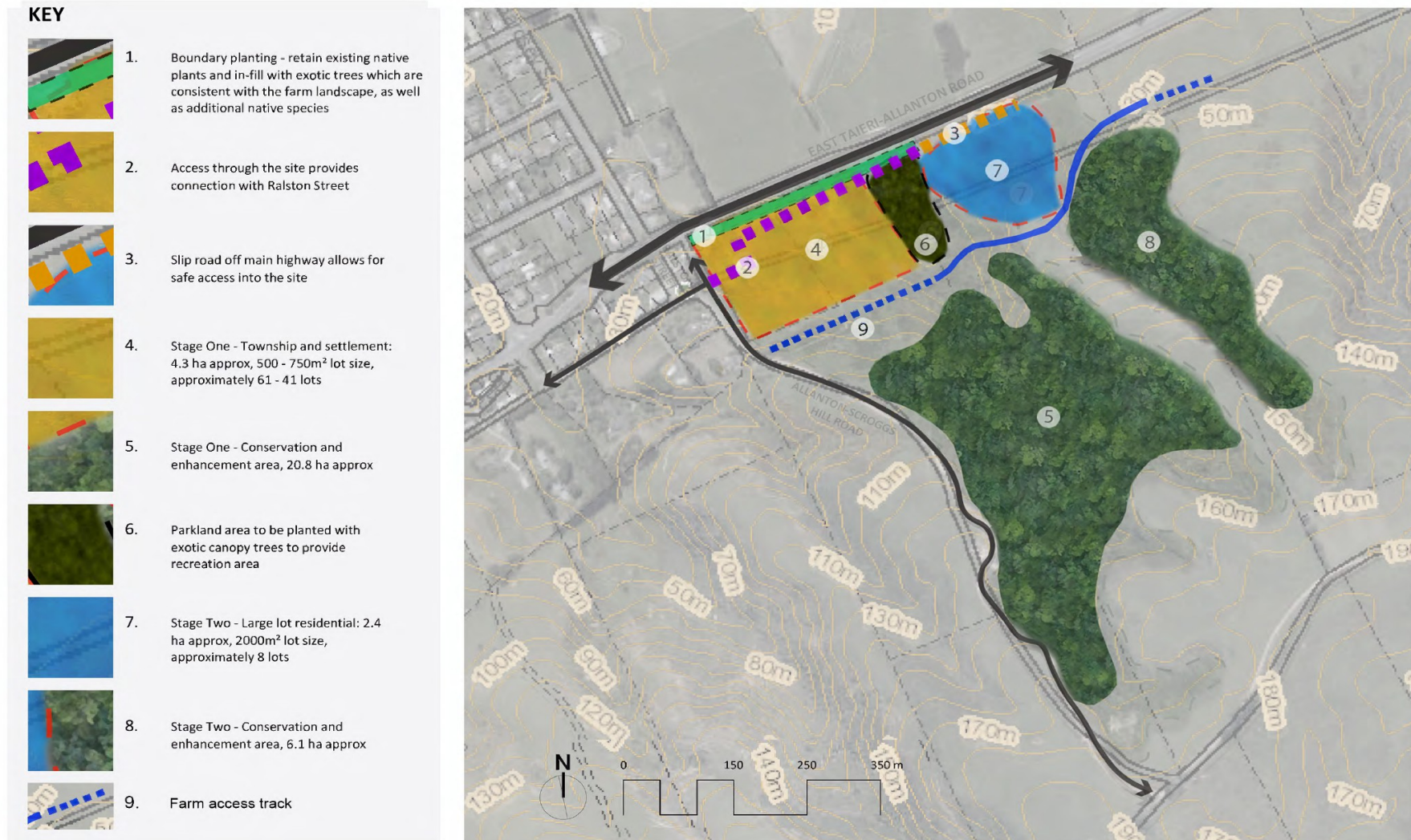
64. Council has incorrectly applied Policy 2.6.2.1 in recommending that site be declined for residential rezoning.
65. Interpretation of Policy 2.6.2.1 cannot be undertaken in a Dunedin City centric way. Growth must be provided for in townships so that the large rural area within Dunedin City District can be supported by those townships. Allanton is one such township requiring residential expansion.
66. The analysis of RS 200 against the rezone criteria contained in Policy 2.6.2.1 clearly demonstrates that RS 200 is an ideal site for rezoning residential.

Dated this 5th day of August 2022



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

Appendix 1: Landscape Proposal Included with Submission 232.



Appendix 2: 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 3: s42a Appendix C.30

APPENDIX C.30 Rezoning Assessment Sheet – 489 East Taieri-Allanton Road (RS200)		
SITE DETAILS		
Change Number	RS200	
Site outline image	Allanton  0 500 1000 1500m Rejected Site(s) Township and Settlement Coastal Taieri Plain	
Site Address	Part 489 East Taieri-Allanton Road	
Full area assessed	As shown in map above	
Site Area	8.6 hectares	
Current zoning	Rural	
PROPOSAL DETAILS		
2GP Zone assessed	Township and Settlement, Large Lot Residential 1	
ASSESSMENT CRITERIA		
Slope	Significant issues	Mean slope of 14.9 degrees
Aspect - Solar access	Very good	Generally sloping north
Accessibility – Public Transportation	Poor	There is a non-frequent bus stop approximately 1,661m away, and a high-frequency bus stop approximately 7,673m away.
Accessibility - Centres	Poor	The Mosgiel principal centre is approximately 8,990m away.

Accessibility – Schools	Poor	The nearest primary school is approximately 6,891m away
Rural character/visual amenity	Significant issues	This site occupies gently to moderately sloping pastoral land to the east of Allanton. The slopes above the site are contained within the Saddle Hill SNL. The site displays attributes consistent with key values of this rural zone, it is part a broader, consistent rural, pastoral landscape to the east of Allanton and there is a currently well-defined eastern edge to residential development within this small township. The proposed rezoning is not supported from a rural character and visual amenity perspective.
Impacts on productive rural land	Significant issues	The site is largely covered by LUC Class 3 soils. The land appears to be used in primary industry and development will result in loss of primary productive capacity in this area.
Reverse sensitivity	Some issues (manageable)	The site is adjacent to SH1. 2GP performance standards require acoustic insulation within 40m of a state highway.
Significant indigenous biodiversity	No issues	The site is largely pasture, with an area of gorse. There are no areas of vegetation within the site that meet the 2GP ecological significance criteria. As there is currently no indigenous vegetation within the site, rezoning the proposed site would have minimal effect on indigenous biodiversity. Consideration could be given to creating an ecological restoration site within the area of residential development, for example by establishing a corridor of indigenous forest along the drain in the centre of the site.
Natural landscapes and natural coastal character	No issues	
Access to the coast and water bodies	No issues	
Significant Trees, heritage items, important vistas or viewshafts, important green or open spaces	No issues	
Natural Hazards	No issues	The site is assessed as having low level hazards associated with flooding. Specific engineering design and assessment will be required to identify zones that are unsuitable for development near the ephemeral watercourse.
Potable water supply	Significant issues (manageable)	The site is outside of the area serviced for water supply by DCC. Adjacent Allanton is self-serviced for water. Therefore, an on-site self-servicing assessment has been completed. The portion of site that is proposed to be zoned as Township and Settlement is not considered feasible for self-servicing based on our assessment, however it is acknowledged that existing adjacent sites in Allanton at

		the same zoning are already self-serviced for water supply. The adequacy of the existing self-servicing in Allanton and how much tankered water top-up is required by existing residents is unknown. The portion of the site that is proposed to be zoned Large Lot Residential 1 is considered to be constrained, self-servicing may be possible in this zoning.
Wastewater supply	Some issues (manageable)	West of the site location is Allanton and a potential service connection to the wastewater scheme. The Allanton wastewater scheme is a pressure sewer scheme with individual pump stations for each lot discharging to a rising main to the Mosgiel wastewater treatment plant. A high-level assessment suggests connecting to this is feasible. However, a detailed analysis is recommended for confirmation.
Stormwater management	Significant issues (manageable)	There is no existing stormwater infrastructure close to the subject site. Downstream of the site is a naturally contoured field leading to a small pond. This is connected to ORC Schedule Drain 01A which flows into the Owhiro Stream, eventually discharging into the Taieri River. Capacity of the watercourses prior to the Owhiro Stream cannot be determined therefore attenuation has been assessed for the 100-year storm event. The Owhiro Stream has capacity issues in rainfall events when the Taieri River level is up and the Owhiro can not discharge into it, this results in flood issues in Mosgiel. Provided the new stormwater management rules in Variation 2 are applied to the whole proposed area the site may be considered developable, however there are concerns over the affordability of the stormwater infrastructure.
Transport effects (local)	Significant issues (not manageable)	The site is located distant from the central city. Walking and cycling would not be a feasible form of transport and there is no infrastructure to support alternative modes of transport nor is there public transport. This section of SH1 is a Limited Access Road. Residential development on the site is anticipated to have a significant impact on the state highway network. This is because the Structure Plan provided implies access to State Highway 1 would be proposed and there is no evidence of consultation with Waka Kotahi in that regard. As above, this is particularly important noting that the road is a Limited Access Road. Ralston Street has no footpaths or kerbs. The development could potentially change the traffic dynamics on this road to a significant degree. Overall, from a transport perspective, it is considered that the site is not a good candidate for the zoning sought due to its isolated location, proximity to State Highway 1, and lack of provision for alternative modes of transport.

Transport effects (wider network)	No issues	No specific issues noted
Compact city – proximity to existing residential areas	No issues	
Compact city - ability to develop land efficiently	Good	The site has an estimated capacity of 49 dwellings under the proposed structure plan.
Effects on Manawhenua values	No issues	
Issues for: • network utility operators • Southern District Health Board • Ministry for Education • FENZ	Some issues (manageable)	Waka Kotahi commented that this site is remote from supporting urban amenities and has safety concerns due to accessing State Highway 1 in a high speed environment close to a passing lane.
Other constraints on development (encumbrances, owner aspirations, appeals)	Some issues (manageable)	Site is subject to a building line restriction and Gazette Notices declaring SH1 to be a limited access road.

Appendix 4: Information from Modal Consulting Limited.

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 a left turn auxiliary lane to enable vehicle access to a proposed development site located immediately to the east of the Allanton township, on the southern side of State Highway 1. The location of the site is shown in Figure 1, below.



Figure 1 – Development site location

Design Parameters

The design details for turning treatments are contained within the Austroads Guide to Traffic Management - Part 6: Intersections, Interchanges and Crossings Management, and Part 4A: Unsignalised and Signalised Intersections. Auxiliary turning lanes are the minimum design that should be provided for access to the site. Figure 2 shows the general layout of an auxiliary lane for left turning

traffic and any detailed design should be based on this in the first instance. Figure 3 shows the various components making up the turning lane, where deceleration to turning speed is required (for the purposes of this memo, it is assumed that deceleration to a stop is not required).

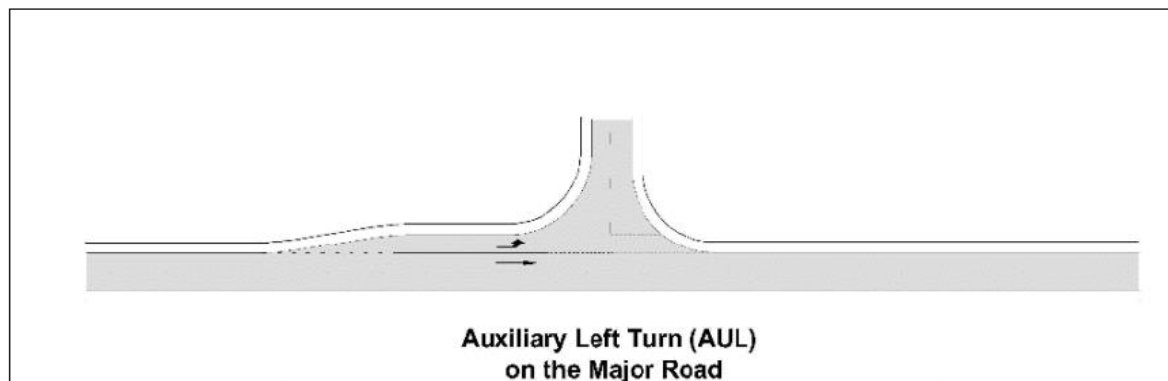


Figure 2 – Typical auxiliary left turn lane layout (from Austroads Part 4A).

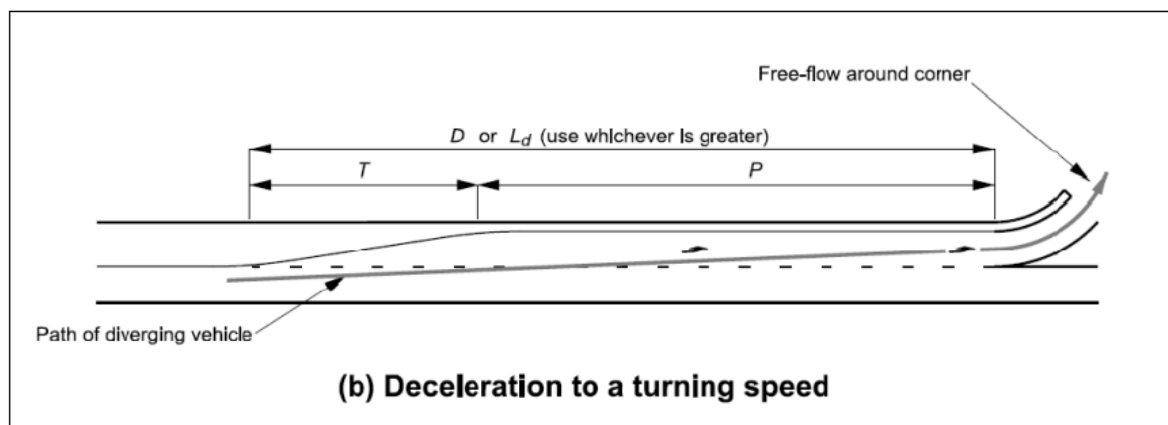
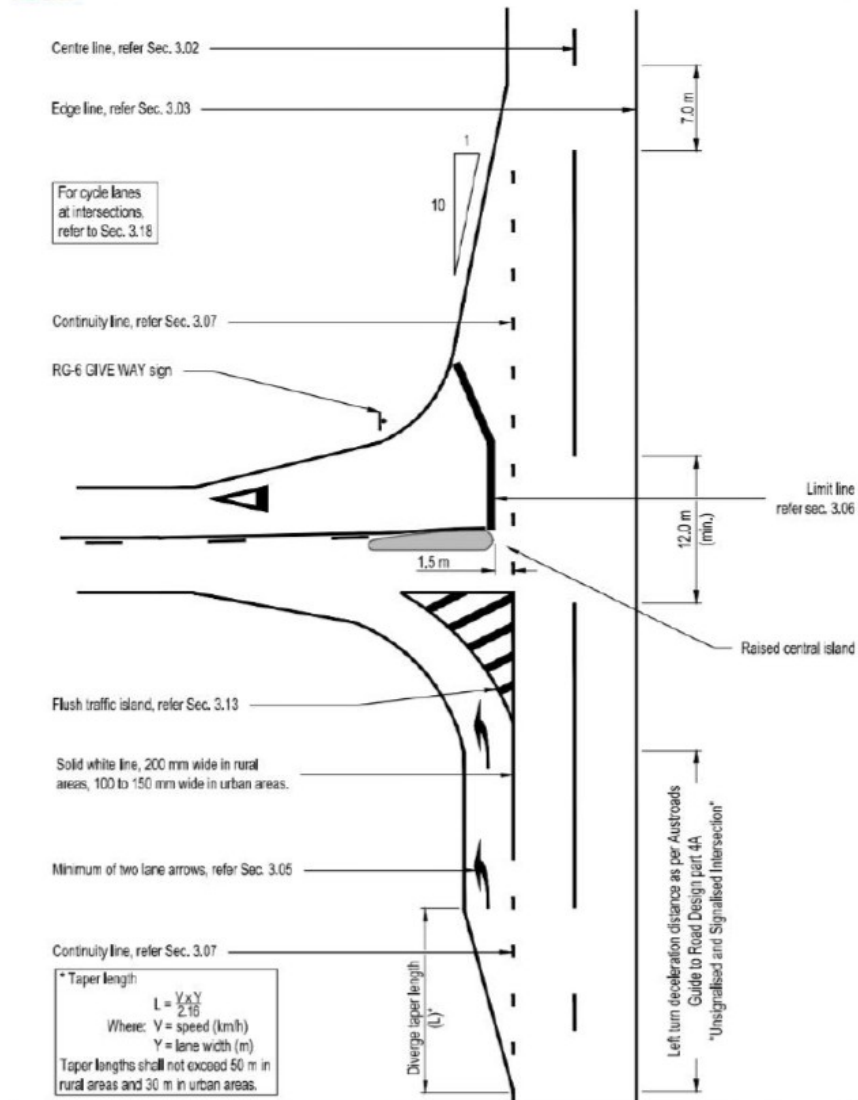


Figure 3 – Auxiliary left turn lane components (from Austroads Part 4A).

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 (free-flow around corner) is 30km/h.
- 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 the auxiliary left turn lane for deceleration to a turning speed (D) is 140m (including taper, and subject to detailed design of the auxiliary lane and intersection layout). It is recommended that detailed design for the auxiliary lane be undertaken as part of normal subdivision consent requirements, with pavement markings designed in accordance with MOTSAM (as shown in Figure 4, below).



**MARKINGS FOR LEFT TURN LANES
 WITH A FLUSH TRAFFIC ISLAND**

FIGURE 3.20

Figure 4 – MOTSAM pavement markings for left turn auxiliary lane.

Grant Fisher

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