

HEARINGS COMMITTEE AGENDA

WEDNESDAY, 9 DECEMBER 2020, 2.00 PM

Edinburgh Room, Municipal Chambers

MEMBERSHIP: Councillors David Benson-Pope (Chairperson), Jim O'Malley and Steve Walker

IN ATTENDANCE: Campbell Thomson (Senior Planner/Committee Advisor), Shane Roberts (Consultant Planner), Angus Robertson (Parks and Recreation Planner) and Wendy Collard (Governance Support Officer)

PART A (Committee has the power to decide these matters):

1 ESPLANADE RESERVE WAIVER – SUB-2020-139 AND LUC-2020-438, 49 DALZIEL ROAD, DUNEDIN

Introduction

Applicant to introduce themselves and their team.

Procedural Issues

Any procedural matters to be raised.

Presentation of the Planner's Memorandum

Report from Shane Roberts

Refer to pages 1 - 6

The Applicant's Presentation

Subdivision Scheme Plan

Refer to page 7

Consent Notice

Refer to pages 8 - 13

Geolink Report

Refer to pages 14 - 20

Council Officer's Evidence

- Memorandum from Parks and Recreation Planner
Refer to page 21

The Planner's Review of their Recommendation

The Planner reviews their recommendation with consideration to the evidence presented

The Applicant's Response

The Applicant to present their right of reply

PLEASE NOTE: The **only** section of the hearing which is not open to the public is the Committee's final consideration of its decision, which is undertaken in private. Following completion of submissions by the applicant, submitters and the applicant's right of reply, the Committee will make the following resolution to exclude the public. All those present at the hearing will be asked to leave the meeting at this point.

RESOLUTION TO EXCLUDE THE PUBLIC

To be moved:

“That the public be excluded from the following parts of the proceedings of this meeting, namely, Item 1.

The general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under Section 48 (1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

	General subject of each matter to be considered.	Reason for passing this resolution in relation to each matter.	Ground(s) under section 48 for the passing of this resolution.
1	Resource Consent application – 49 Dalziel Road, Dunedin	That a right of appeal lies to any Court or Tribunal against the Dunedin City Council in these proceedings.	Section 48(1)(d)

Memorandum

TO: Hearings Committee

FROM: Shane Roberts, Consultant Planner

DATE: 30 November 2020

SUBJECT: **RESOURCE CONSENT APPLICATION SUB-2020-139 & LUC-2020-438**
ESPLANADE RESERVE WAIVER CONSIDERATION

DESCRIPTION OF APPLICATION

1. The applicant is seeking subdivision consent to subdivide the property at 49 Dalziel Road into two Lots and land use consent to erect a dwelling (within a proposed building platform) on Lot 1. The building platform is located within that part of the site that is zoned Rural Residential 1 Zone and is relatively small at 10 x 7 metres. Lot 1 is proposed to be 2 hectares and Lot 2 9.8 hectares. The site is an irregular shaped parcel of 11.7972 hectares and is made up of a large predominantly bush clad gully system (southern & eastern extents) and more rolling open pasture (northern extent).
2. The subject site is legally described as held in Record of Title 897992 and is legally described as Lot 18 DP 534910.
3. As part of the application, the applicant has sought resource consent to waive the esplanade requirements of the Proposed 2GP. As Council Staff do not have delegation to approve this, the matter has been referred to the Hearings Committee for a decision.

PLANNING PROVISIONS

4. The site is subject to the following provisions in terms of the Proposed 2GP:
5. The subject site is subject to three zonings:
 - Rural Residential 1;
 - Large Lot Residential 1; and
 - Recreation.
6. The site is also subject to the following overlays:
 - The area Zoned Large Lot Residential 1 is subject to a Structure Plan Mapped Area Overlay. Both the overlay and zoning are subject of an appeal.
 - Esplanade Reserve requirement along Frasers Creek¹
7. That said, the part of the site the Frasers Creek runs through is predominantly Recreation Zoned land, with a small portion then Large Lot Residential 1. I have been informed by Council staff that this site is the only privately owned land that is zoned recreation in the Proposed 2GP.
8. The Proposed 2GP was notified on 26 September 2015, and some Proposed 2GP rules had immediate legal effect from this date. Some rules became fully operative following the close of

¹ As is identified later in the report, the Proposed 2GP uses both Frasers Creek and Frasers Stream in Section 10. I have used Frasers Creek throughout the report apart from in directly quoting Appendix 10C.

submissions, where no submissions were received. Additional rules came into legal effect upon the release of decisions. Those additional rules become fully operative if no appeals are lodged or once any appeals have been resolved.

9. I note part of the site zoned Large Lot Residential 1 is subject to appeal, to which the esplanade provision also applies.
10. In terms of the Operative District Plan all the land at the site is zoned Rural. Rules 18.5.4 and 18.5.5 list the waterbodies requiring esplanade strips or reserves. Frasers Creek or Frasers Stream is not mentioned in either of these rules, therefore the opportunity to require an esplanade reserve did not apply.
11. In this instance, the relevant Proposed 2GP provision is 10.3.1.1.b.11:
 - Rule 10.3.1.1.b.ii requires an esplanade reserve with a width of 20m be provided along the bank of Frasers Creek. The applicant is seeking consent to breach this provision therefore the activity is a **restricted discretionary activity** under Rule 10.3.1.4.
12. The other relevant planning matter is the fact a consent notice is registered against the site's Record of Title. The consent notice (9575090.14) was imposed on a previous subdivision of the site. It prohibits development in the gully system on the site, including the areas that would become esplanade reserve.
13. A copy of the report that formed the basis of the consent notice is attached.

ESPLANADE RESERVES – RELEVANT STATUTORY PROVISIONS

Resource Management Act 1991

14. Sections 77 and 230 of the Resource Management Act 1991 allows for the variation of the width of esplanade reserves, either in the district plan or by resource consent. In considering this request, Council is required to have regard to the matters set out in Section 229 of the RMA.
15. Section 229 of the Resource Management Act 1991 identifies the purposes for which the esplanade reserves or strips can be taken. The reserve or strip can have one or more of the following purposes.
 - (a) to contribute to the protection of conservation values by, in particular, —*
 - (i) maintaining or enhancing the natural functioning of the adjacent sea, river, or lake; or*
 - (ii) maintaining or enhancing water quality; or*
 - (iii) maintaining or enhancing aquatic habitats; or*
 - (iv) protecting the natural values associated with the esplanade reserve or esplanade strip; or*
 - (v) mitigating natural hazards; or*
 - (b) to enable public access to or along any sea, river, or lake; or*
 - (c) to enable public recreational use of the esplanade reserve or esplanade strip and adjacent sea, river, or lake, where the use is compatible with conservation values.*
16. I consider that an esplanade reserve could be taken at the site for one or more of the purposes listed above.

Proposed 2GP

17. As identified above, the activity is a restricted discretionary activity. Council has restricted its discretion to the following matters in Rules 10.5.3.1 and 10.5.3.2 of the Proposed 2GP

- *Positive effects on biodiversity values or the natural character of the coast (10.5.3.1.a)*
- *Effects on biodiversity values and natural character values of riparian margins and the coast (10.5.3.2.a)*
- *Effects on public access (10.5.3.2.b)*

18. The Proposed 2GP also lists the following general assessment guidance:

In assessing a change or reduction to the required esplanade reserve or esplanade strip, Council will consider:

1. *the effects on the values of the water body as identified in Appendix 10C;*
2. *the effects on the natural functioning of the water body;*
3. *the effects on other biodiversity values and natural character values; and*
4. *any other measures proposed to enhance the biodiversity of the riparian or coastal margin and associated water body.*
5. *the effects on public recreation and access values as identified in Appendix 10C;*
6. *any relevant circumstances listed in the New Zealand Coastal Policy Statement 2010 or the Regional Policy Statement for Otago that may support restriction of public access; and*
7. *the potential effects of sea level rise on the future level of the mean high water springs, and thus the width of the reserve.*

19. The Proposed 2GP also provides the following additional guidance:

Potential circumstances that may support a consent application include²:

- *Other opportunities to enhance public access are created by the subdivision.*
- *The design of the subdivision takes advantage of adjacent unformed legal roads to provide public access.*
- *Restricting access is necessary to protect public health and safety.*

PARKS AND RECREATION PLANNING COMMENTS

20. The application for a waiver (via resource consent) for an esplanade reserve has been reviewed by Council's Parks and Recreation Planner from Council's Parks and Recreation Team (PARS). He notes that PARS have an interest in this matter as management of esplanade strips and reserves rests with PARS. PARS commented as follows:

- *PARS have previously commented on this site in February 2017 as part of the 2GP rezoning process, noting the significant potential to expand on the existing Fraser's Gully walking track for recreational use by walkers and mountain bikers, especially through the portion of native bush. The upper half of this section also has potential to be planted out and act as an access to either Ashmore Street to the east, or Taieri Road to the north.*
- *A key action of the 2017-2027 Dunedin City Parks and Recreation Strategy is to create a connected network of recreational tracks, walkways and cycleways. There are a number of tracks and parks in this area that could benefit from further connections through the recreation zoned land in this proposal, including connections to Ashmore Street and Dalziel Road. While this would likely be at the discretion of the landowner, PARS would be happy to liaise with the applicant on this matter if this is something they are interested in.*
- *We also note that the esplanade strip discussed by the applicant on p.8 and p.9 should instead be a 20m wide esplanade reserve under Rule 10.3.1.b.i. While any decision to waive or reduce this requirement is decided by an independent hearings panel, PARS typically require a robust reason to offer support for this. Any acquisition of esplanade reserves needs to be seen as a long-term vision to link up tracks and reserves in the city and/or to ensure protection of ecological values and riparian margins; they don't necessarily need to be publicly accessible or promoted.*

² This provision is subject to appeal

PLANNING ASSESSMENT

Assessment of Effects

21. Appendix 10C of the Proposed 2GP lists the following Water Body Values for Frasers Stream:

Water Body	Conservation Values	Public Access and Recreation Values
Frasers Stream	Banded kokopu	Trout

22. Confusingly, the Rule refers to Frasers Creek (not Frasers Stream), but I have assumed they are the same waterbody.

Positive effects on biodiversity values or the natural character of the coast (10.5.3.1.a)

23. An esplanade reserve could have positive effects on biodiversity particularly through active management of the reserve, such as pest and weed control. This would potentially be offset by the loss of any indigenous vegetation / disturbance required to put a walking track through the site.

Effects on biodiversity values and natural character values of riparian margins and the coast (10.5.3.2.a)

24. The only listed biodiversity value in the plan for this water body is Banded kokopu. That said the site does have some existing natural character, through the comparatively natural ground cover and steep and unmodified topography of the gully system.

Effects on public access (10.5.3.2.b)

25. There is clearly the potential for an esplanade reserve to be taken as part of this subdivision to provide for improved public access potentially linking the current walking track in Fraser's Gully to Taieri Road, and this is clearly identified by PARS staff in their report.

26. If this is indeed the principal concern for PARS, it does seem odd that the only Public Access and Recreation Value given for this area is 'Trout'. It is unclear if this relates to spawning habitat or angling potential – I assume it is the former given the location of the site high in the Frasers Creek catchment, however there are a variety of terms used in Appendix 10C including reference to trout spawning but not for this waterbody.

27. I note I have visited the site multiple times, however I have not ventured into the gully at the bottom of the site, due to access difficulties.

28. I do note that the northern end of the Frasers Creek as shown in the 2GP Planning maps runs through the area Zoned Large Lot Residential 1 under the 2GP. As identified above, the zoning of this part of the site is subject to appeal, and the Committee should consider whether granting an esplanade over this part of the site with an outstanding appeal, and ahead of any development, is appropriate.

Objectives and Policies Assessment

Relevant Objectives & Policies	Analysis
Section 10 – Natural Environment	
Policy 10.2.2.7 Only allow subdivision activities adjacent to water bodies and the coast where the subdivision is designed to ensure that the following biodiversity values and natural character values are maintained or enhanced, including through provision of an	The proposed subdivision will maintain the biodiversity values and natural character values lists in (a-c) through retaining the recreation zoned land in a single large lot, aside from a small portion that will form part of Lot 1.

esplanade reserve or esplanade strip in identified locations: (a) biodiversity values of riparian margins and the coast; (b) the water quality and aquatic habitats of the water body or coast; and (c) the natural functioning of the adjacent sea or water body.	From the comments provided by PARS it is not clear that an esplanade reserve will necessarily maintain and enhance the listed values (a-c) as the driver for the esplanade is access, not biodiversity, water quality or the natural functioning of the waterbody.
Objective 10.2.4 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.	There is no current access to Frasers Creek from the site to maintain though this application, however public access can be enhanced by the provision of an esplanade reserve.
Policy 10.2.4.3 Require subdivision of land to enhance public access to the natural environment through: (a) requiring an esplanade reserve or esplanade strip of an appropriate width and location adjacent to identified water bodies and the coast; and (b) where practicable, providing opportunities for access in other areas where this will enhance recreational opportunities, particularly through connecting to and expanding the existing tracks network or utilising adjacent unformed legal roads.	This policy is very directive, requiring an esplanade be provided as part of the subdivision, adjacent to an identified water body (Frasers Creek). I also note the provision of an esplanade reserve will provide opportunities for access although (b) relates to areas other than those adjacent waterways.

CONCLUDING REMARKS

29. It is PARS preference to have a 20.0 metres wide esplanade reserve on both sides of Frasers Creek to contribute to a long-term vision to link up tracks and reserves in the city and/or to ensure protection of ecological values and riparian margins. PARS also note esplanades do not necessarily need to be publicly accessible or promoted.
30. The applicant would prefer this is deferred until the site is further developed due to health and safety risks, including from animals grazing on the site, privacy concerns and that the area is in general impassable due to large boulders and rocks.
31. As identified above, Appendix 10C, in terms of public access and recreation values for Frasers Creek, only lists 'Trout' as the sole public access and recreation value for the waterbody. PARS consider that it is of value for matters such as recreational walking and cycling access. This type of access is provided for by Section 229 of the Act.
32. The Proposed 2GP policy framework is very directive towards an esplanade reserve being taken by Council, and additionally this would align with the land being zoned recreation.
33. I consider that an esplanade reserve would meet the requirements of Section 229 of the Act, and would be consistent with the objectives and policies of the 2GP.

RECOMMENDATION

1. That the application for resource consent to not provide an esplanade reserve along Frasers Creek be **refused** for the part of the site zoned recreation, and **granted** for the part of the site zoned Large Lot Residential 2.

2. That a 20.0m esplanade on both banks of Frasers Creek be vested in Council, within the land Zoned Recreation on the site.
3. That the bed of Frasers Creek vests as river.

Report prepared by:

Report checked by:



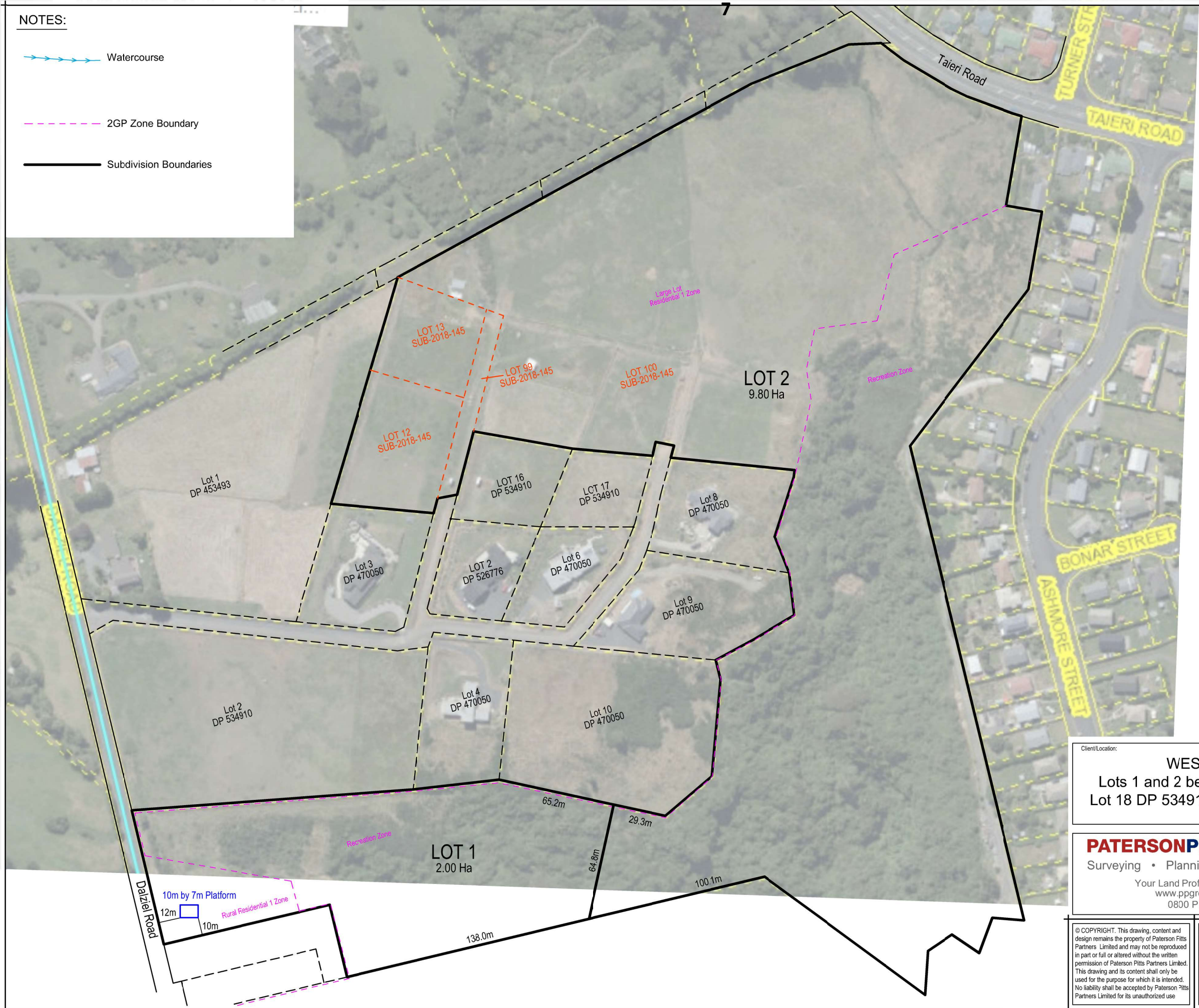
Shane Roberts
Consultant Planner



Campbell Thomson
Senior Planner

NOTES:

-  Watercourse
-  2GP Zone Boundary
-  Subdivision Boundaries



Client/Location:

WESTACOTT HEIGHTS

Lots 1 and 2 being a Proposed Subdivision of
Lot 18 DP 534910 (also Lot 100 SUB-2018-145)

PATERSONPITTSGROUP
Surveying • Planning • Engineering
Your Land Professionals
www.ppgroup.co.nz
0800 PPGROUP

DUNEDIN:
229 Moray Place.
PO Box 5933,
Dunedin 9058.
T 03 477 3245
F 03 474 0484
E dunedin@ppgroup.co.nz

© COPYRIGHT. This drawing, content and design remains the property of Paterson Pitts Partners Limited and may not be reproduced in part or full or altered without the written permission of Paterson Pitts Partners Limited. This drawing and its content shall only be used for the purpose for which it is intended. No liability shall be accepted by Paterson Pitts Partners Limited for its unauthorized use

Surveyed by:	
Designed by:	K.BOWEN
Drawn by:	K. BOWEN
Checked by:	
Approved by:	K.BOWEN
Job Ref:	D14955

Original Size:	Scale:	
A3	1:2,000	
DO NOT SCALE		
Sheet No:	Version No:	Date Created:
1 of 1	B	12/10/2020



View Instrument Details

Instrument No.	9575090.14
Status	Registered
Date & Time Lodged	18 Dec 2013 15:40
Lodged By	Whyte, Sharon Lee
Instrument Type	Consent Notice under s221(4)(a) Resource Management Act 1991

Toitu te
Land whenua
Information
New Zealand



Affected Computer Registers	Land District
634083	Otago

Annexure Schedule: Contains 5 Pages.

Signature

Signed by Sally Fay Peart as Territorial Authority Representative on 16/01/2014 01:07 PM

***** End of Report *****

IN THE MATTER of Section 221 of the Resource Management Act 1991

AND

IN THE MATTER of an application for Subdivision Consent SUB 2012-92

CONSENT NOTICE

Whereas Council has granted Resource Consent to the proposed subdivision comprised in DP 470050 subject to the following conditions which are required to be complied with on a continuing basis by the owners and subsequent owners of the land or parts thereof being the condition specified in the operative part of this notice.

Operative Part

Condition relating to Lot 7 DP 4700050 (Computer Freehold Register 634083)

The location of all buildings and structures on the lots shall be wholly located within the buildable areas identified on the attached plan, unless otherwise approved by a land use consent issued by the Dunedin City Council.

If any development is proposed within the area identified as 'zone B' on the attached plan by Geolink Land Investigations entitled 'Urban Capability Map for proposed subdivision – Dalziel Road, it shall be supported by a site specific geotechnical assessment, by a suitably qualified person, to establish the effects of the development in terms of land stability. No earthworks or other construction activity shall commence until the suitability of the development is confirmed.

There shall be no development within areas C and D on the attached plan by Geolink Land Investigations entitled 'Urban Capability Map for proposed subdivision – Dalziel Road. This includes earthworks or other site works that could modify or alter potential flood flows through area C, or the mass felling or clearing of vegetation within Area D. Any vegetation that is removed within area D shall be immediately replaced to limit the effects of land instability.

That within 6 months of the issue of a building consent for a dwelling the head of the gully area shall be fenced with a post and wire fence in general accordance with the depiction of additional fencing depicted on figure 2 of the application for resource consent received by Council on the 12 November 2012.

Where any part of the dwelling platform is to be founded on engineered fill, then this shall be specified, supervised and certified by an

appropriately qualified person in accordance with NZS 4431-1989 Code of Practice for Earthfill for Residential Development.

The amenity planting required by Condition 11 of the Land Use resource consent LUC 2012-504 shall be maintained on a continuing basis.

The dry stone rock walls within each lot shall not be destroyed or removed, but maintained as a landscape amenity feature.

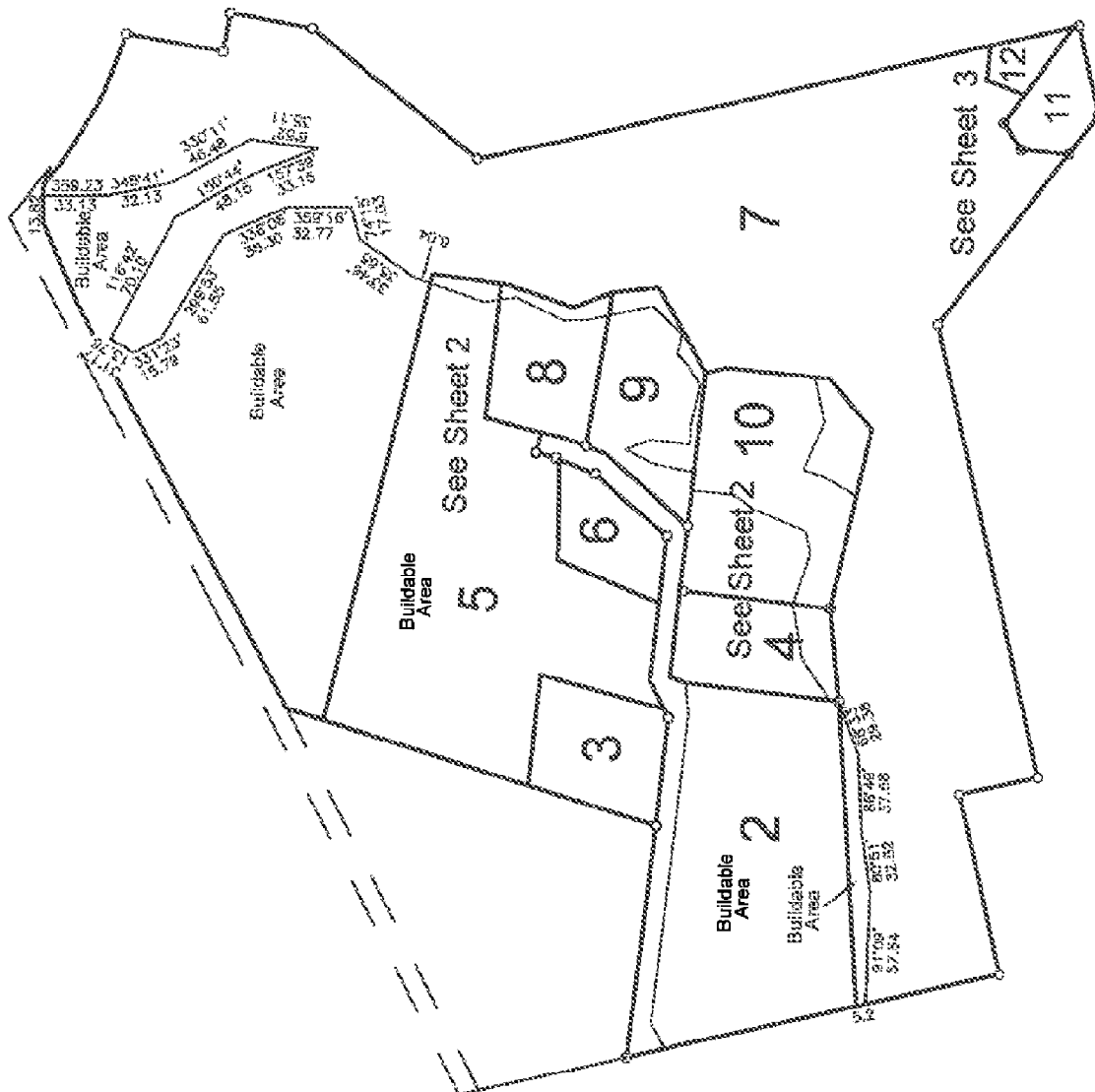
Forestry activity shall be prohibited.

DATED at Dunedin this 29th day of NOVEMBER 2013

Signed for and on behalf of the Dunedin City Council


.....
Authorised Officer

11



Note:

- 1) The buildable area within Lot 7 is scaled from Geolink Land Investigations plan (Urban Capability Map). The final extents of buildable area in Lot 7 is subject to field survey and/or further geotechnical investigations.
- 2) All buildings shall comply with the side and rear yard set back for buildings set out in Rule 6.6.2(f)(b) of the District Plan

PH (dec)

Buildable Area Plan

Lots 2 - 10 DP 470050

Ref: RPR Properties Ltd D85

1

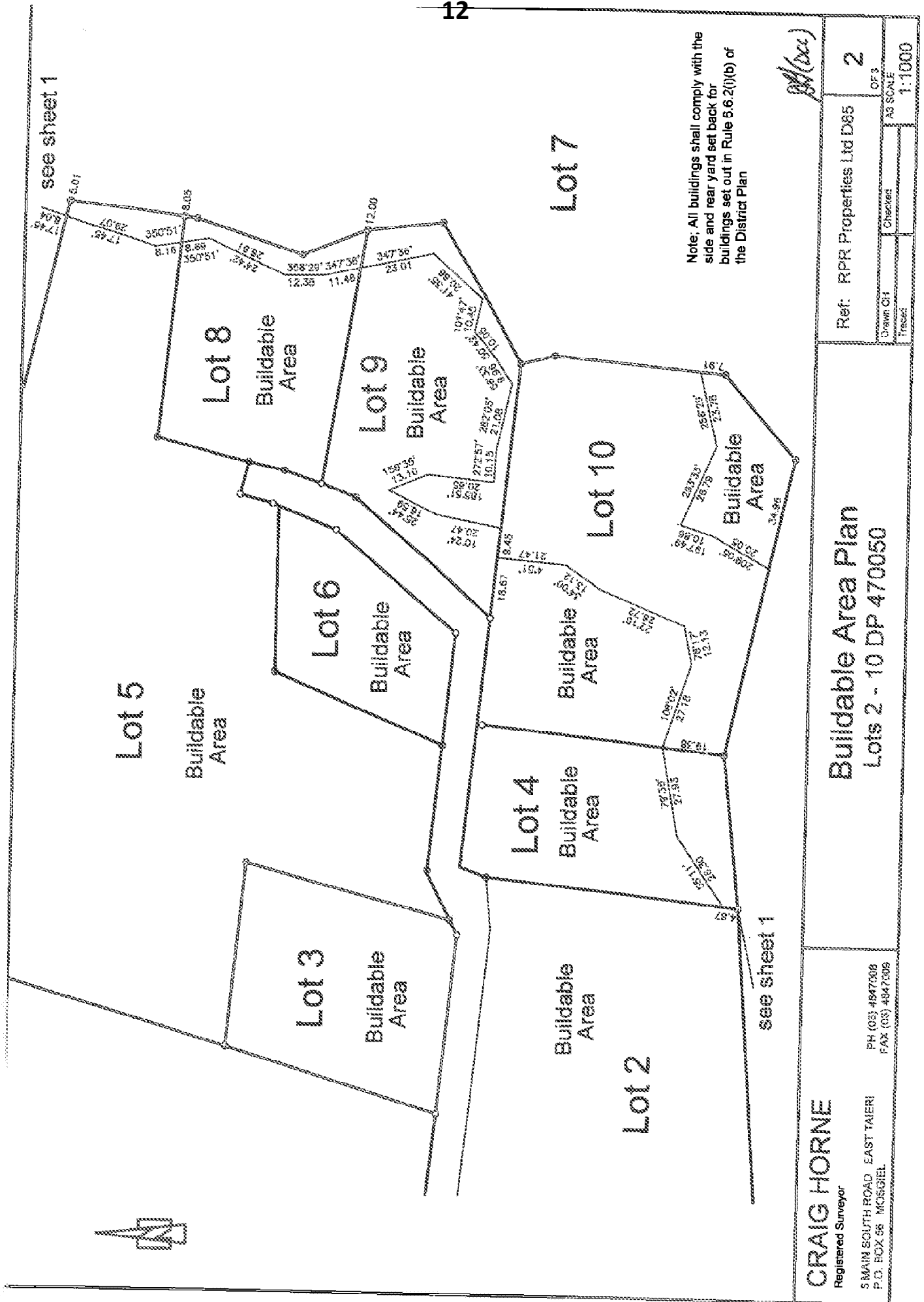
OF 3

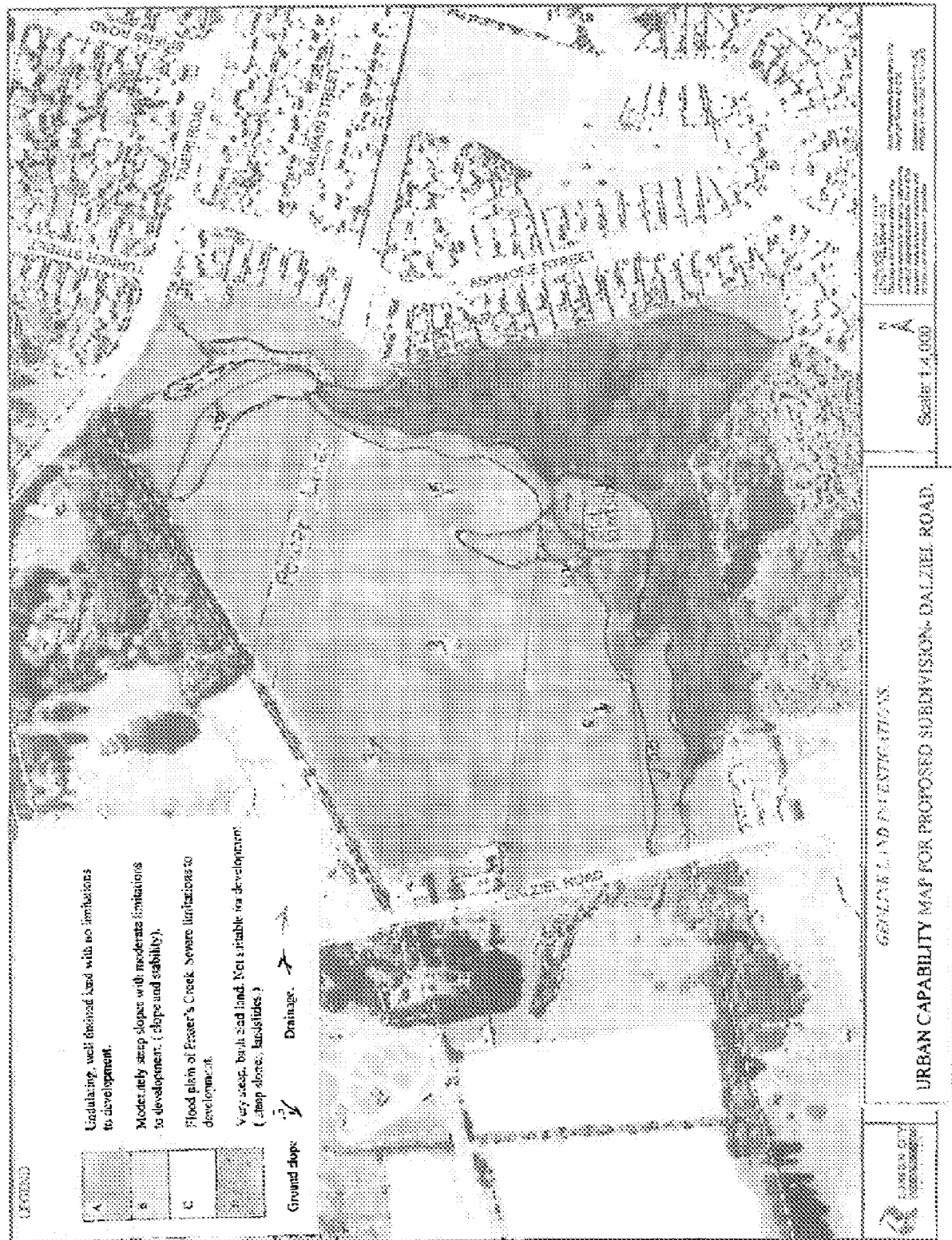
A3 SCALE

1:1000

CRAIG HORNE
Registered Surveyor

6 MAIN SOUTH ROAD EAST TAHERI
P.O. BOX 56 MOSSGIEL
PH (03) 4947008
FAX (03) 4947009





GEOLINK LAND INVESTIGATIONS
**GEOTECHNICAL ASSESSMENT FOR PROPOSED DEVELOPMENT-
WESTACOTT PARK, DALZIEL ROAD, WAIKARI.**

16 D Picardy Mornington Dunedin 03 453 5997 email geolink@earthlight.co.nz

CONTENTS

1. Introduction
2. Physical description
3. Geology
4. Soils
5. Mass movement
6. Urban capability
7. Conclusions.

Appendix –Map

**GEOTECHNICAL ASSESSMENT FOR PROPOSED
DEVELOPMENT-WESTACOTT PARK, DALZIEL ROAD, WAKARI.**

1.Introduction.

The developers are proposing to develop a block of land between Dalziel Road and Ashmore street, Wakari, Dunedin. Geolink has been asked to assess the suitability of the land for urbanisation and identify any possible limitations and/or hazards. The investigation involved a walkover survey, a study of aerial photos and research of any appropriate literature.

2.Physical description.

The majority of the property consists of undulating land in pasture. A creek runs down the eastern boundary forming a steep sided, bush-clad valley.(Fraser's Gully.)

3. Geology.

The undulating land is underlain by a volcanic lava flow which has been mapped by Benson as **dolerite** and **basalt**. These are dark, fine to medium grained basic rocks that can be seen outcropping around the edge of the flow and in the stone walls on the property. Underlying the volcanics is the **Caversham Sandstone** and this is exposed in the bottom of Fraser's Gully. The gully has been formed by the creek downcutting into the softer sandstone.

4. Soils.

The soils were examined using a hand auger. They keyed out to be **Acid Mafic Brown Soils**. These are formed from weathered basic volcanic rocks and loess and are characterised by reddish brown B horizons which are well drained. The soils are acidic with a pH of less than 5.5. Depth varies and they may be stony. They are mapped locally as **Cargill Soils**.

5 Mass movement.

The majority of the property is stable but there is some evidence of some **old landsliding** along the edge of the lava flow where the ground steepens.(see appendix- geotechnical map.)

The steep bush-clad slopes of Fraser's Gully **contain old landslides** and the slopes are considered potentially very unstable if the bush was removed.

6. Urban capability.

The suitability of land for development has been assessed by using a four-fold classification-

Class A- Undulating, well-drained land with no limitations to development. This class is suitable for high density residential use.

Class B- Moderately steep slopes with moderate limitations to development. These include the steepness of the slope and possible slope instability. Some building platforms would require additional geotechnical investigation.

Class C- Upper flood plain of Fraser's Creek. Severe limitations of flooding to development.

Class D- Very steep, bush-clad land. Not suitable for development. A high potential exists for slope instability.



Class A land no limitations to development.



Class B land moderate limitations to development.



Class C land severe limitations to development, flood plain of Fraser's Creek.

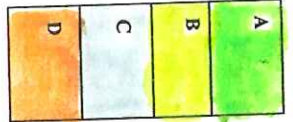


Class D land not suitable for development.

7. Conclusions.

- 1. Large areas of the property are suitable for high density residential development.**
- 2. Class B land is capable of lower density development and may require further investigation.**
- 3. The flood plain of Fraser's Creek and Gully are not suitable for development.**
- 4. The soils are suitable for conventional effluent disposal systems.**

LEGEND



A Undulating, well drained land with no limitations to development.

B Moderately steep slopes with moderate limitations to development. (slope and stability).

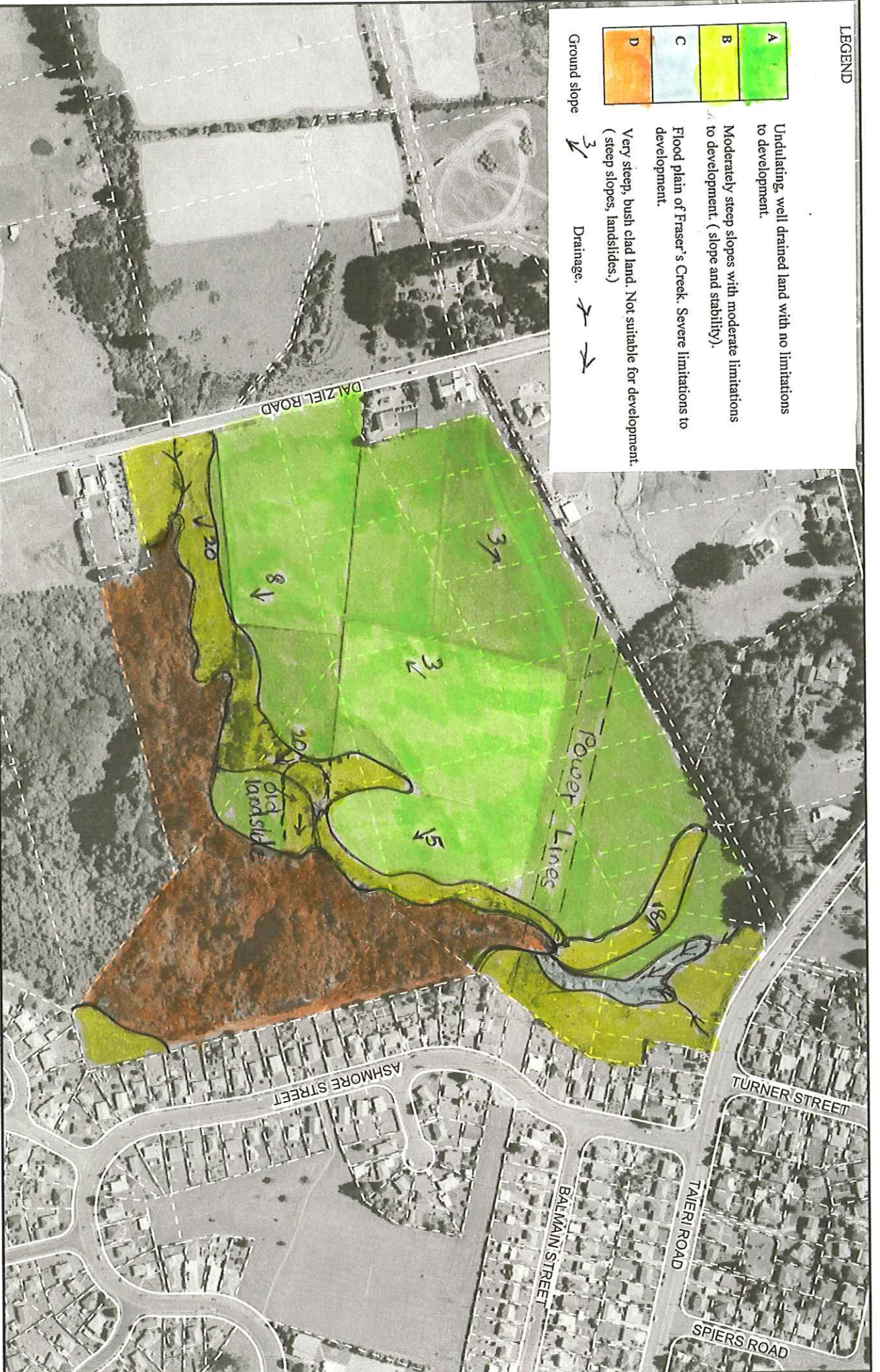
C Flood plain of Fraser's Creek. Severe limitations to development.

D Very steep, bush clad land. Not suitable for development. (steep slopes, landslides.)

Ground slope



Drainage.



GEOLINK LAND INVESTIGATIONS.

URBAN CAPABILITY MAP FOR PROPOSED SUBDIVISION- DALZIEL ROAD.

Scale: 1:4,000



PARCEL LINES CAN VARY FROM
LEGAL PARCEL BOUNDARIES
This map is for information purposes only
and is not to be used for any other purpose.
Every effort has been made to ensure correctness and
reliability of the information presented.

Aerial Photography: David Lamb 2000
Copyright: Geomatics Ltd. 2000
Cartographic Data: sourced from LINZ
CROWN COPYRIGHT RESERVED

Memorandum

TO: Shane Roberts, Planning Consultant
FROM: Angus Robertson, Parks and Recreation
DATE: 13 October 2020
SUBJECT: **SUB-2020-139 & LUC 2020-438- 2 LOT SUBDIVISION
AND DWELLING
49 DALZIEL ROAD, DUNEDIN**

Hi Shane,

Thank you for the opportunity to comment on the above applications, on Recreation and Rural Residential 1 Zoned land. DCC Parks and Recreation Services (PARS) have an interest in these applications as responsibility for public recreation land, walking tracks and management of esplanade strips/reserves sits with PARS.

PARS have previously commented on this site in February 2017 as part of the 2GP rezoning process, noting the significant potential to expand on the existing Fraser's Gully walking track for recreational use by walkers and mountain bikers, especially through the portion of native bush. The upper half of this section also has potential to be planted out and act as an access to either Ashmore Street to the east, or Taieri Road to the north.

A key action of the 2017-2027 Dunedin City Parks and Recreation Strategy is to create a connected network of recreational tracks, walkways and cycleways. There are a number of tracks and parks in this area that could benefit from further connections through the recreation zoned land in this proposal, including connections to Ashmore Street and Dalziel Road. While this would likely be at the discretion of the landowner, PARS would be happy to liaise with the applicant on this matter if this is something they are interested in.

We also note that the esplanade strip discussed by the applicant on p.8 and p.9 should instead be a 20m wide esplanade reserve under Rule 10.3.1.b.i. While any decision to waive or reduce this requirement is decided by an independent hearings panel, PARS typically require a robust reason to offer support for this. Any acquisition of esplanade reserves needs to be seen as a long-term vision to link up tracks and reserves in the city and/or to ensure protection of ecological values and riparian margins; they don't necessarily need to be publicly accessible or promoted.

Please let me know if you need anything more from PARS.

Regards,
Angus Robertson
Parks and Recreation Planner
Recreation Planning and Facilities