

24 February 2021

Kirstyn Lindsay
Planning South

Via email kirstyn@planningsouth.nz

Attention: Kirstyn Lindsay

Dear Kirstyn

Tunnel Beach Carpark s92 response

We refer to your s92 request dated 25 January 2021 regarding the proposed Tunnel Beach Carpark (LUC-2020-361). We **attach** an updated set of civil and landscape drawings that have minor amendments to them made in response to the questions. Our response to the questions is provided below.

1. The plans show that the existing angled parks are to be removed in favour of a walkway plus a 2m verge with amenity planting. It is noted in the ITA that parking restrictions will be put in place to prevent vehicles parking on Tunnel Beach Road. It is also noted that the area is used by freedom campers. Given that drivers can typically (lawfully) park between the parking restriction markings and the legal edge of the road, what measures are proposed (if any) to prevent freedom campers from parking on the verge?

Freedom camping within Dunedin City's Road Reserve is managed by the Camping Control Bylaw 2020. The proposed removal of carparking at the end of Tunnel Beach Road and the inclusion of no parking lines will remove an area that visitors could potentially freedom camp within. If visitors decide to freedom camp in Tunnel Beach Road following the completion of the proposed works they will now be required to park in a uneven verge, this is not expected to be desirable.

2. The ITA notes that a bus stop is provided within the site, and a tour coach is shown within it (Drawing 3336298-CA-030). A swept paths drawing showing how such a vehicle could circulate around the car park has not been provided. Please provide a swept paths for a tour coach entering the car park and circulating around (both exiting the site and recirculating within it). This model should make allowance for the expected 0.5m clearances between the vehicle bodywork and any obstructions.

Please refer to the **attached** updated tracking sketches.

3. Campervan parking is proposed, and swept paths are shown showing how this can be accessed (Drawing 3336298-CA-030). The swept path of the entering vehicle shows that area is needed to the east of the vehicle upon entry. The swept path of the exiting vehicle shows that area is needed on the west of the vehicle. When the two swept paths are combined, it appears that extra width is needed on entry and exit, and hence that these spaces are too narrow. Please provide a single swept path showing a campervan entering and exiting the space to allow a check on whether the vehicle will over-run landscaping.

Please refer to the **attached** updated tracking sketches.

4. The plans show that formal zebra crossings are proposed on Tunnel Beach Road and within the car park. Please provide a rationale for providing zebra crossings. The area is lightly trafficked and

so it is not clear why courtesy crossings would not operate satisfactorily, especially since zebra crossings will require signage and ongoing maintenance.

Please refer to the **attached** updated drawings which have removed the zebra crossings.

5. The ITA notes that the gradient of part of the internal circulation route is 1 in 6. While a gradient of 1 in 6 can be traversed by cars, transition grades are required at the bottom and top to prevent the vehicle grounding. Please provide confirmation that these are provided. Also, for buses/coaches, transition grades need to be longer and more gentle than for cars (that is, the maximum change of gradient is less). Please provide confirmation that the requirements for coaches have taken into account and provide details.

Grade requirements have been taken into account and proven on vertical tracking software. Please refer to the **attached** updated tracking sketches which include vertical tracking.

6. The report notes that an existing issue with the current arrangement is a lack of adequate facilities for vehicles to turn around at the end of Tunnel Beach Road. It appears that this situation is not improved at times when the car park is closed – is this the case?

This is correct. Other than by removing existing parking, the car park project does not involve improved turning at the end of Tunnel Beach Road. We note however, that tunnel beach traffic will no longer be required to turn at the end of Tunnel Beach Road as it will now enter and exit through the proposed carpark.

7. The Landscape report indicates that the car parking spaces will be gravelled. Please confirm that the mobility spaces will be sealed as required under the Building Act.

The mobility spaces will be chip sealed.

8. At 4.1 of the LVA, existing rural amenity is initially assessed as “high”, however, in the summary statement it is noted as “moderate”. Please confirm whether the existing rural amenity of the site is high or moderate.

Rural amenity should be assessed as high and was translated incorrectly in the summary.

9. Mitigation measures and recommendations Appendix 3 of the LVA the provides the plant species selection and their general location. Please confirm if an implementation and maintenance plan has been written in support of this application and, if so, what information this contains.

An implementation and maintenance plan has not been prepared, however there will be a landscape specification completed as part of the detailed design phase which include planting details and maintenance requirements including a 24-month defects liability period for plant establishment.

10. Please confirm what grade plants are proposed for planting areas.

Tree species and grades have been specified in the tree schedule located in the **attached** updated landscape plans.

11. Both the Second-Generation District Plan (2GP) and the operative District Plan (2006) apply. Where plan provisions are subject to appeal in the 2GP, then both the 2GP and the operative District Plan rules apply. Several objectives and policies in the 2GP relating to the coastal character overlays are under appeal. These character overlays are considered in the LVA as part of the wider context of the proposal, however, objectives and policies relating to landscape in the operative

District Plan have not been considered. Please clarify what are the effects of the proposal when considered against the operative District Plan (2006) landscape objectives and policies.

As identified, several objectives and policies relating to coastal character overlays in the 2GP are under appeal. As such, an assessment is required against the applicable comparative objectives and policies of the operative District Plan (2006).

In the operative District Plan, the site is located in the South Coast Coastal Landscape Preservation Area (SCCLPA). The SCCLPA seeks to preserve the visual dominance, integrity and coherence of the natural landform and the character of the dramatic coastal views and limited influence of large scale structures and exotic plantings. The identified threats to these visual qualities are inappropriate siting, design and scale of structures, roads and shelterbelts.

Noting that the proposed car park will not be within any 2GP landscape overlays, the proposed works are considered to be consistent with the following objectives and policies of the operative District Plan:

Objectives:

14.2.2 – Ensure that the natural landscape characteristics of the coastal environment, wetlands, lakes, rivers and their margins are preserved and protected

14.2.3 – Ensure that land use and development do not adversely affect the quality of the landscape

14.2.4 – Encourage the maintenance and enhancement of the quality of Dunedin's landscape

Policies:

14.3.2 – Identify and preserve the important characteristics that create the natural landscape character in the coastal environment, wetlands, lakes, rivers and their margins

14.3.4 – Encourage development which integrates with the character of the landscape and enhances landscape quality

Currently, the operative District Plan identifies the area has holding integrity, extent and coherence of the natural character of the landform, being a dramatic coastal environment where visual interest is focussed on the coastal edge. Specifically, the dramatic landforms are referenced as the Caversham sandstone cliffs (Tunnel Beach area). The proposed car park location and design has been carefully considered so as to not detract from this coastal character or result in visual dominance over the coastal landform. In doing this, the car park has been located laterally along the private access road at the end of Tunnel Beach Road. This has been a conscious design choice taking into account the design philosophy of seeking to avoid dominance on the coastal landscape and associated earthworks. Through this design, the natural character of the Caversham sandstone cliffs are protected while the proposed land use enhanced the quality of the landscape through the removal of adverse social effects (rubbish, anti-social behaviour, unmanaged parking/traffic etc).

Additionally, the site is currently vacant with exotic grass where-as Chapter 14.5.2 of the operative District Plan seeks to preserve the remaining areas of indigenous vegetation. The proposed design seeks to enhance the environment in this respect by introducing indigenous species suited to the harsh coastal environment.

Overall, the proposed works are considered to integrate into the existing, and preserved, character of the landscape and consequently will be consistent with the above objectives and policies of Chapter 14 of the operative District Plan 2006.

12. In section 7 of the LVA "Conclusions", it is stated that "Overall, the proposal for a new carpark will result in low-moderate degree of effects on the landscape character of the site and the surrounding area." I note that in section 6.1 "Landscape Effects", natural character effects are assessed as moderate, and effects on rural amenity and associative values are assessed as low. The effects on natural character are omitted from the conclusions of the report. Please clarify how effects on landscape character have been concluded as low-moderate.

The low-moderate rating is an 'on balance' assessment that considers the assessment of associative and rural amenity affects both being low and the effects of the natural character being moderate. This approach recognises the overarching nature of landscape character and the inclusion of the likes of natural character, rural amenity and associations as constituent parts.

13. Please clarify if natural character has been assessed separately from landscape character.

No. As above, the approach taken recognises that in this coastal context natural character is inherent within the broader concept of landscape character.

Please don't hesitate to contact me should you have any further queries.

Yours sincerely



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on behalf of

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Claire Swift, Dunedin City Council

