



AGENDA

Independent Hearings Panel Meeting Thursday, 23 October 2025

Date: Thursday, 23 October 2025

Time: 9:00 am

**Location: Alexandra Community House, 14-20
Centennial Avenue, Alexandra**

Notice is hereby given that an Independent Hearings Panel Meeting will be held at Alexandra Community House, 14-20 Centennial Avenue, Alexandra on Thursday, 23 October 2025 at 9:00 am.

Order Of Business

1	Apologies	5
2	Reports	6
25.13.1	RC250095 - GLENOIR LP	6

Members Independent Commissioner Louise Taylor (Chairperson), Independent Commissioner Rosalind Day-Cleavin, Independent Commissioner Wendy Baker

In Attendance Tarryn Lines (Minute Secretary)

1 APOLOGIES

2 REPORTS

25.13.1 RC250095 - GLENOIR LP

Doc ID: 2600180

1. Purpose

A report to consider a subdivision consent to create 27 residential allotments, and land use consent for a comprehensive residential development, earthworks and performance standard breaches at 155 and 157 Dunstan Road, Alexandra is attached.

2. Attachments

- Appendix 1 - s42A Planners Report [↓](#)
- Appendix 2 - s95 Notification Report [↓](#)
- Appendix 3 - Application [↓](#)
- Appendix 4 - Amended Application [↓](#)
- Appendix 5 - Boffa Miskell Urban Design Peer Review Report [↓](#)
- Appendix 6 - Engineering Advice [↓](#)
- Appendix 7 - 01 Submission - Jasmine Stewart [↓](#)
- Appendix 8 - 02 Submission - Sandra Donnelly [↓](#)
- Appendix 9 - 03 Submission - Nick Davison [↓](#)
- Appendix 10 - 04 Submission - William Anderson [↓](#)
- Appendix 11 - 05 Submission - Andrew Hawkeswood [↓](#)
- Appendix 12 - 06 Submission - Paddy Kilbride [↓](#)
- Appendix 13 - 07 Submission - Andrew Little [↓](#)
- Appendix 14 - 08 Submission - Dougal Laidlaw [↓](#)
- Appendix 15 - 09 Submission - Ross & Alison Meldrum [↓](#)
- Appendix 16 - 10 Submission - Ross Meldrum & Others [↓](#)
- Appendix 17 - 11 Submission - Barry Mackie [↓](#)
- Appendix 18 - 12 Submission - Gregory & Shirley Davis [↓](#)
- Appendix 19 - 13 Submission - Jan Manson [↓](#)
- Appendix 20 - 14 Submission - James & Nikita Pyle [↓](#)
- Appendix 21 - 15 Submission - Holly Saunders [↓](#)
- Appendix 22 - 16 Submission - John Waldron [↓](#)
- Appendix 23 - 17 Submission - Caroline Tamblyn [↓](#)
- Appendix 24 - 18 Submission - Graeme Bell [↓](#)
- Appendix 25 - 19 Submission - Matthew Hore [↓](#)
- Appendix 26 - 20 Submission - Clifford Hiscock [↓](#)
- Appendix 27 - 21 Submission - Richard Tamblyn [↓](#)
- Appendix 28 - 22 Submission - Shane Fulton [↓](#)
- Appendix 29 - 23 Submission - David Wilson [↓](#)
- Appendix 30 - 24 Submission - Jolyon Flannery (George) [↓](#)
- Appendix 31 - 25 Submission - Rhys Tait [↓](#)
- Appendix 32 - 26 Submission - Peter Silveira & Tracy Blackwell [↓](#)
- Appendix 33 - 27 Submission - David Golden [↓](#)
- Appendix 34 - 28 Submission - Simon Johnston [↓](#)
- Appendix 35 - 29 Submission - Grant Porter [↓](#)
- Appendix 36 - 30 Submission - Blair Fieldes [↓](#)
- Appendix 37 - 31 Submission - Tane Russell [↓](#)
- Appendix 38 - 32 Submission - Cameron Rutherford [↓](#)

CENTRAL OTAGO DISTRICT COUNCIL
REPORT OF PLANNING OFFICER

APPLICATION	RC250095
APPLICANT	GLENOIR LP
ADDRESS	155 AND 157 DUNSTAN ROAD
LEGAL DESCRIPTION	LOT 2 DP 581459 AND LOT 2 DP 603963 (HELD IN RECORD OF TITLE 1182384). LOT 2 DP 518150 (HELD IN RECORD OF TITLE 811352)
ACTIVITY DESCRIPTION	SUBDIVISION CONSENT TO CREATE 27 RESIDENTIAL ALLOTMENTS LAND USE CONSENT FOR A COMPREHENSIVE RESIDENTIAL DEVELOPMENT, EARTHWORKS AND PERFORMANCE STANDARD BREACHES
ACTIVITY STATUS	NON COMPLYING

STATUS OF THE REPORT

1. The purpose of this report is to bring to the attention of the Commissioners all relevant factual information or issues which should be considered in deliberating on the proposal. I emphasize that any conclusions reached or recommendations made in this report are not binding on the Commissioners, and it should not be assumed that the Commissioners will reach the same conclusion or decision having considered all of the evidence.

AUTHOR QUALIFICATIONS AND EXPERIENCE

2. My name is Tanya Copeland. I am a Team Leader of Planning with Central Otago District Council. I hold a Bachelor of Science from the Victoria University of Wellington. I have 13 years of experience in resource consenting and have been engaged in my current role since February 2023.
3. While this is not an Environment Court proceeding, I confirm that I have read the Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing this report and will continue to comply with it while giving oral evidence. In that regard, I confirm that this report is written within my area of expertise, except where otherwise stated, and that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

BACKGROUND, NOTIFICATION AND SUBMISSIONS

4. The application was publicly notified on 22 May 2025 and a total of 27 submissions were received by the closing date. Five late submissions were received following the close of the submission period. Section 37A of the Resource Management Act 1991 (the RMA) allows a consent authority to waive compliance with a time limit provided the interests of any person who may be affected by the time limit extension are taken into account and the duty to avoid unreasonable delay is considered. In this instance, I recommend that the timeframe for the receipt of submissions be extended by two working days to enable the consideration of the five late submissions. This minor extension to include these

submissions is not considered to have any material adverse effect on any person, the community or the applicant, and ensures that due consideration is given to the views of these persons.

5. Of these submissions, 27 were in support of the application and 5 were in opposition. I have had regard to the contents of the submissions in full when considering the application.
6. The applicant formally amended the application on 22 September 2025. The amendments to the application as originally lodged are summarised as follows:
 - (a) Inclusion of a balance parcel of land at 157 Dunstan Road
 - (b) A reduction in the number of resultant residential allotments in order to comply with the density standard prescribed in Rule LLRZ-R12.
 - (c) Amendment to the location of the connecting road to the site to the southeast
 - (d) Inclusion of a recreational reserve (park) to be vested in Council.
7. Alongside the amended application, the applicant submitted a letter from Barrister Rebecca Wolt. The letter outlined the legal considerations surrounding whether the amendments are within scope of the original application. I have read this letter and agree with the position of Ms Wolt that the amendments can be considered within scope of the original application. Specifically, I agree that:
 - (a) The amendments generally represent a reduction in the scale and intensity of the activity despite the inclusion of an additional balance parcel of land. The original application sufficiently signalled an intention to include this balance parcel despite it not being shown on the original scheme plan.
 - (b) The changes have the effect of reducing the effects of the proposal and the proposal better aligns with the Central Otago District Plan (District Plan) framework, specifically in relation to the Comprehensive Residential Development (CRD) provisions.
 - (c) The amendments are unlikely to have triggered submissions from parties who have not already done so. The additional parcel is owned by the applicant and the party most impacted by the inclusion of this land has made a submission that is wide enough in scope to ensure any implications of the changes can be raised by this submitter.

DESCRIPTION OF PROPOSAL

8. The applicant, Glenoir LP, seeks resource consent to undertake a 31 lot subdivision of the site at 155 and 157 Dunstan Road, Alexandra. The site comprises a total area of 4.29ha, with 155 Dunstan Road comprising of 4.12ha and a portion of the property at 157 Dunstan Road comprising of 0.1680ha.
9. The applicant proposes to configure the subdivision as follows:
 - Lots 1-28 would be freehold lots for residential activity. The lots range in size from 840m² to 1,940m².
 - Lot 29 would be vested in Council as recreation reserve.
 - Lot 30 would be vested in Council as road reserve, serving as a future roading and servicing connection to land to the southeast.
 - Lot 31 would be vested in Council as road reserve.
10. The subdivision is proposed to be accessed from Dunstan Road via a central access road. The central access road (Lot 31) would have a legal width of 16.9m at the entry off Dunstan Road with the road tapering to a width of 14.35m at the narrowest point. A 6.0m formed carriageway will be provided in the access handle portion of the central access road with a 3.0m shared footpath for pedestrians and cyclists on the northern side of the

carriageway. The central part of the proposed access road contains a 6.0m formed carriageway, 2.5m carparking bays on either side and a 1.5m dual footpath. Right of way accesses are proposed throughout the subdivision to provide access to rear allotments. The applicant proposes to form these to a 3.0m width, with dual 1.5m grass berms.

11. The applicant concurrently seeks land use consent for a Comprehensive Residential Development (CRD) and for consequential breaches to District Plan performance standards pertaining to future built form on Lots 1-3 including separation distances between dwellings, building coverage breaches, yard setbacks, setbacks from roads and earthworks. Land use consent is also sought for earthworks on contaminated land.
12. The proposal is depicted in Figure 1 below.

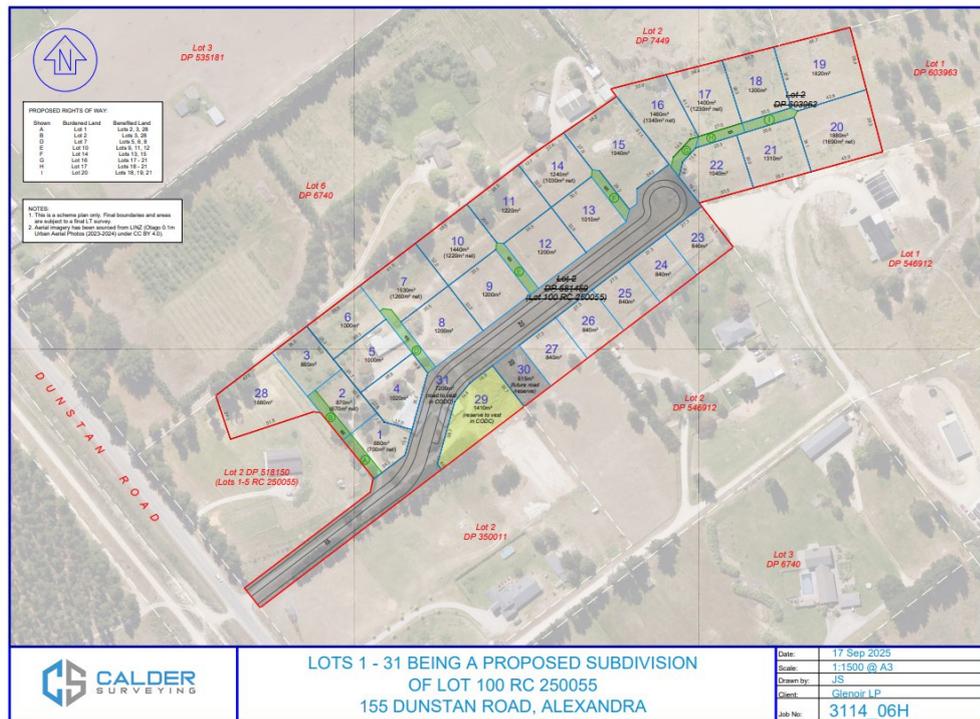


Figure 1: Proposed subdivision of 155 & 157 Dunstan Road (Source: Amended application, 2025)

13. The application is supported by the following documents:
 - Detailed Environmental Site Investigation, prepared by Claude Midgley of Insight Engineering.
 - Remediation Action Plan, prepared by Claude Midgley of Insight Engineering.
 - Transport Assessment, prepared by Andy Carr of Carriageway Consulting Limited.
 - Legal submission on the application of operative and proposed zoning rules, prepared by Rosie Hill of Todd & Walker Law.
14. As part of my assessment of the application, I commissioned an Urban Design Report, prepared by Nicole Bitossi of Boffa Miskell to support my Section 42A report. This was undertaken with the agreement of the applicant under Section 42A (1AA)(b) of the Resource Management Act 1991.

SITE DESCRIPTION

15. The subject site is located at 155 and 157 Dunstan Road Alexandra. The site is legally described as Lot 2 DP 581459 and Lot 2 DP 603963, held in record of title 1182384, and Lot 2 DP 518150, held in record of title 811352.
16. The site is predominantly flat, but rises in elevation on the north-eastern portion (Lot 2 DP 603963). 155 Dunstan Road contains an existing dwelling, several outbuildings and scattered mature vegetation. The part of 157 Dunstan Road that is included in this application is vacant.
17. The site is surrounded by allotments to the northwest, north, and northeast that are established as rural lifestyle type properties; generally containing singular residential dwellings, ancillary outbuildings and small scale rural production activities. The locality is characterised by a density of development established under the previous Rural Residential zoning regime which supported allotments with a 2ha average area.
18. The site is accessed from Dunstan Road. On the opposite side of Dunstan Road is the Central Otago Rail Trail administered by the Department of Conservation and scheduled for this purpose under the District Plan. Adjacent to the Central Otago Rail Trail is land zoned Medium Density Residential under the District Plan. A portion of this land has been recently developed into new housing, and a portion remains undeveloped and covered in pine trees. The Alexandra Golf Course is approximately 250m along Dunstan Road to the northwest and is designated for this purpose.

PLANNING FRAMEWORK

Central Otago District Plan (District Plan)

19. The subject site is located within the Large Lot Residential Zone (LLRZ) as notified by Plan Change 19. The LLRZ zoning of the subject site is currently under appeal to the Environment Court by the applicant. The appeal seeks that the site be rezoned to either Low Density Residential (LRZ) or LLRZ (Precinct 1).
20. On the basis that the Environment Court appeal remains unresolved, the rules pertaining to the Rural Resource Area (Rural Residential) apply to the proposal pursuant to Section 86F of the RMA. However, given the relief sought in the appeal, full weight is given within this report to the provisions and anticipated environmental outcomes of the LLRZ. The Rural Residential Zoning is no longer a possible outcome for the site, nor is there potential through the resolution of the appeal to revert the site to a less intensive residential density than the LLRZ provisions of Plan Change 19.
21. The proposal requires resource consent as follows under Section 86F of the RMA:
Subdivision consent:
 - As a **non-complying activity** pursuant to Rule 4.7.5(iii) for the subdivision of land in the Rural Resource Area (Rural Residential) which fails to comply with the 2ha average allotment size required by Rule 4.7.2 (ii)(a)(i).
 - As a **restricted discretionary activity** pursuant to Rule 4.7.3(i) for a breach of Rule 4.7.2(ii)(a)(ii) which requires a plan of subdivision intended to accommodate dwellings to identify building platforms with a separation distance of 50m between any existing dwellings, proposed dwelling or other building platform.
 - As a **discretionary activity** pursuant to Rule 4.7.4(iii) for a breach of Rule 4.7.2(ii)(a)(iv) which requires a maximum number of five allotments on a plan of

subdivision accommodating residential activity within the Rural Resource Area (Rural Residential).

- As a **restricted discretionary activity** resource consent pursuant to Rule 12.7.8(v) which states that no subdivision shall occur within 32m of the centreline and outer edge of the support structure of a high voltage transmission line that is designed to operate at or over 110kV.

Land use consent:

- As a **discretionary activity** pursuant to Rule 4.7.4(i) for a breach of the separation distance between dwellings required by Rule 4.7.3(vii). The proposal results in the establishment of dwellings, not located on building platforms, which will be within 50m of an existing dwelling.
- As a **restricted discretionary activity** pursuant to Rule 4.7.3(i) for a breach of Rule 4.7.6A(a) which requires a minimum yard setback of 10m.
- As a **discretionary activity** pursuant to Rule 4.7.4(i) for a breach of Rule 4.7.6J(b) which limits earthworks on the site to an area of 2,000m² and a volume of 3,000m³.

Plan Change 19

22. As outlined above, full weight is to be applied to the provisions of the LLRZ in the District Plan as it relates to the proposal. The following provisions of the LLRZ are applicable to the proposal:

Subdivision consent under the following:

- A **restricted discretionary activity** pursuant to SUB-R5 where the overall density of the site complies with 1,500m².

Land use consent under the following:

- A **restricted discretionary activity** pursuant to LLRZ-R12.1.b where the density across the site is less than one dwelling per 1500m².
- A **restricted discretionary activity** pursuant to LLRZ-R11 where the maximum volume of land excavated within a 12 month period exceeds 200m³ per site.
- A **restricted discretionary activity** pursuant to LLRZ-S4 where the building coverage on some of the smaller proposed allotments will likely exceed 30%.
- A **restricted discretionary activity** pursuant to LLRZ-S5 for a breach to the minimum setback of 7m from a boundary with a road.
- A **restricted discretionary activity** pursuant to LLRZ-S6 for a breach of the internal boundary setbacks.

National Environmental Standards

23. The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health Regulations 2011 (NESCS) came into effect on 1 January 2012. The site has been identified as having had an activity or industry undertaken on it, as described in the current edition of the Hazardous Activities and Industry List (HAIL) and is therefore subject to the NESCS. The application includes a Detailed Site

Investigation (DSI) undertaken by Insight Engineering. The DSI concludes that areas of the site contain arsenic levels which exceed residential guidelines. The application is subject to resource consent under the NESCS as follows:

- A **restricted discretionary** activity pursuant to Regulation 10(2) of the NESCS.

24. There are no other National Environmental Standards relevant to this application.

Overall Status

25. Where an activity requires resource consent under more than one rule, and the effects of the activity are inextricably linked, the general principle from case law is that the different components should be bundled and the most restrictive activity classification applied to the whole proposal. In this case, there is more than one rule involved, and the effects are linked. As such, I consider it appropriate that the bundling principle established in *Locke v Avon Motor Lodge* (1973) is applied. Having regard to the most restrictive activity classification, the application be considered, in the round, as a **non-complying activity** under the operative rules of the District Plan as they apply during the resolution of the appeal, and a **restricted discretionary activity** under Plan Change 19.
26. For the purposes of consideration under Section 104 of the RMA, full weight is applied to the provisions of Plan Change 19.

SECTIONS 104(1) AND 104B

27. The proposal has an overall status as a non-complying activity in the Rural Resource Area (Rural Residential) of the operative District Plan, and an overall status as a restricted discretionary activity under Plan Change 19.
28. This application must be considered in terms of Section 104 of the RMA. Subject to Part 2 of the RMA, Section 104(1) sets out those matters to be considered by the consent authority when considering a resource consent application. Considerations of relevance to this application are:
- (a) any actual and potential effects on the environment of allowing the activity; and
 - (b) any relevant provisions of:
 - i) A national environmental standards;
 - ii) Other regulations;
 - iii) a national policy statement
 - iv) a New Zealand coastal policy statement
 - v) a regional policy statement or proposed regional policy statement
 - vi) a plan or proposed plan; and
 - (c) any other matters the consent authority considers relevant and reasonably necessary to determine the application
29. In accordance with Section 104B of the RMA, a consent authority may grant or decline a resource consent for a non-complying activity and may impose conditions under Sections 108 and 220.

EFFECTS ON THE ENVIRONMENT

30. Consideration is required of the relevant assessment matters in the District Plan, along with the matters in any relevant national environmental standard. While the application is for a non-complying activity, given the status of Plan Change 19, I have had particular regard to the matters of discretion provided in LLRZ-R12 and SUB-R5. In terms of the matters of discretion, where a Comprehensive Residential Development (CRD) is proposed in conjunction with a subdivision, there are matters of discretion that crossover between both LLRZ-R12 and SUB-R5. I have sought to cover all relevant matters of discretion, however, to avoid unnecessary repetition, some matters have been assessed together where appropriate and the proposal has been considered holistically. No regard has been given to any trade competition or any effects of trade competition.
31. I engaged an urban design report from Ms Nicole Bitossi of Boffa Miskell Limited. The applicant agreed to the review, designed to support my report to the Commissioners under Section 42A of the RMA. The purpose of the review was to assess and consider the following aspects of the application; neighbourhood character, connectivity with wider movement networks, streetscape and public realm and relationship of the development with neighbouring properties. I have adopted the assessment of Ms Bitossi in this regard and defer to her expertise as outlined below.

Permitted baseline(s104(2))

32. Under section 104(2) of the RMA, an adverse effect of the activity on the environment may be disregarded if the plan permits an activity with that effect. That is, an application can be assessed by comparing it to the existing lawful and consented on the site and development that could take place on the site as of right, without a resource consent, but excluding development that is fanciful.
33. In this situation, subdivision, earthworks on contaminated land and breaches of performance standards are not provided for as permitted activities under the District Plan of the NESCS and there is no permitted baseline to be applied.

SUBDIVISION MATTERS

Whether the subdivision creates allotments that can accommodate anticipated land uses and are consistent with the purpose, character and qualities of the applicable zone.

34. The District Plan describes the intended purpose and character of the LLRZ as providing a pleasant, low-density living environment that contains predominantly low-rise and detached residential units on large lots, maintains a predominance of open space over built form, provides good quality on-site amenity, maintains the amenity of adjacent sites and is well-designed and well-connected into the surrounding area. The imposition of a density standard is designed to ensure that development maintains the purpose and character of the LLRZ.
35. The proposal provides for 28 residential allotments, two roading allotments and one recreational reserve. The proposed residential allotments range in size from 840m² to 1,940m². This equates to a residential density of 1,532m² per allotment across the site, aligning with the density standard for a CRD in the LLRZ. The lots are all shaped and sized in a way that would generally allow a reasonable dwelling to be constructed on each in a way that can maintain the intended character of the zone, subject to consideration of specific departures from development standards for some lots, which will be discussed in more detail later in this assessment.
36. A number of submissions in opposition (made in response to the original proposal) raised concerns about the density not complying with District Plan provisions. The amended

application now provides for a density of development that is anticipated by the District Plan for a CRD on the subject site.

The provision of adequate network utility service, including the location, design and construction of these services

37. The applicant intends to connect the subdivision to proposed reticulated water and wastewater infrastructure along Dunstan Road, to be constructed by Council. I understand that Council has approved the funding for these network utilities and detailed design is currently being undertaken. Confirmation has been received from Council's Three Waters Department that this future infrastructure will be extended to service the proposed development. I consider there to be sufficient certainty that this infrastructure will be in place and operational prior to the lapsing of any resource consent granted for this proposal.
38. Council's Three Waters Department have reviewed the proposal in conjunction with Council's Land Development Engineer to provide advice on recommended conditions of consent to secure connections to the future reticulated network utilities and for the provision of firefighting hydrants. The notion within in the recommended conditions, particularly for wastewater, defers specific requirements for infrastructure design until Engineering Approval stage, given that the detailed design of the wastewater main for Dunstan Road is not yet complete. I understand that there is potential that some use of a pressure sewer may be required for development along Dunstan Road. This could change how the proposal connects into the rest of the network. The conditions recommended allow for either the use of gravity or pressure systems. I agree that this is a pragmatic approach where there is an element of uncertainty in specific design requirements, striking an appropriate balance between giving certainty to the applicant that the development is able to be adequately serviced whilst allowing for site-specific modifications that may be required by the time that the development is implemented. I have recommended these conditions in their entirety.
39. Stormwater generated within each allotment and from the accessways is proposed to be discharged to land via soakpit, in the usual manner for Central Otago. Council's engineers have not raised any concerns about the practicality of achieving on-site stormwater management on the proposed lots. Council typically imposes this ongoing requirement as a consent notice on each resultant title. I have recommended a consent notice condition to this effect.
40. Three submissions raised concern over the discharge of stormwater to land and the potential implications on groundwater quality. Whilst the physical mechanism for stormwater discharge is under the jurisdiction of Central Otago District Council, the actual discharge of stormwater to land is under the jurisdiction of Otago Regional Council (ORC). The applicant and all future successors in title are obligated to comply with the rules of the Regional Plan: Water for Otago administered by ORC. I note that under Rule 12.B.1.8 and 12.B.1.9 of the Regional Plan: Water for Otago, the discharge of stormwater from both a reticulated system and from a road can be undertaken as a permitted activity provided certain conditions are met. In my experience, there is no obvious reason to suggest that stormwater discharges resulting from this development cannot comfortably meet this permitted activity criteria. However, the Regional Plan provides a consenting pathway for the alternative. On this basis, I am satisfied that there is adequate provision in place to ensure that stormwater discharge from the proposed development can be managed in a manner to avoid adverse effects on groundwater quality.
41. The applicant proposes to service each residential allotment with underground power and telecommunications utilities. I have recommended that this arrangement is secured by consent condition.
42. The proposal includes Lot 30, which is to be vested in Council as road reserve. This lot would provide a roading connection to adjacent residential zoned land to the southeast. This access corridor additionally provides opportunity for service connections to this

adjacent land should this be required at detailed design stage (Engineering Approval). I have recommended conditions to this effect.

43. Subject to the imposition of consent conditions to secure these services and the physical installation of the necessary infrastructure, the development is likely to be able to be appropriately serviced for potable water, firefighting hydrants, wastewater, stormwater, electricity and telecommunications.

Access

44. The application is supported by a transport assessment prepared by Mr Andy Carr. In terms of internal road design, the applicant has designed the roading in general accordance with NZS 4404:2010. This standard does not currently form part of Council's Code of Practice for Subdivision and Development. Council's Land Development Engineer Mr Dan Kirkman has reviewed the application and the Carriageway report and provided advice and recommended conditions of consent in relation to access for the subdivision. This advice is contained within the agenda. Mr Kirkman notes that Council is in the process of reviewing its subdivision code of practice to incorporate NZS 4404:2010. However, this is yet to be finalised and adopted. As such, the applicable Council standards for roading are contained within NZS 4404:2004 and Council's July 2008 Addendum.
45. The Carriageway consulting report recommends that the intersection with Dunstan Road be upgraded in accordance with New Zealand Transport Agency (NZTA) Diagram D or E standard. Mr Kirkman has recommended Diagram E standard and additionally recommended that the full width of Dunstan Road at the intersection be upgraded to asphaltic concrete to improve structural integrity associated with turning vehicles. I have recommended a condition to this effect.
46. Mr Kirkman confirms that the central road within the subdivision (proposed to be vested in Council as Lot 31) should be constructed to the standard of 'Local Road Residential' from Table 3.1 of Council's July 2008 Addendum, based on the number of residential allotments proposed to be serviced by this road. The applicant proposes a legal width of between 16.9m and 14.35m for this road, a reduction from Council standard which requires a legal width of 20m. Mr Kirkman is not supportive of the proposed legal width given that no obvious physical constraints to achieving the required width exist on the basis that a boundary adjustment could be undertaken with 157 Dunstan Road to increase the legal width of the entrance section of the proposed road access.
47. Mr Kirkman is supportive of the absence of parking lanes through the entrance of this section of road on the basis that this section of road is not adjacent to residential properties. Mr Kirkman is also supportive of the use of two parking lanes on the remainder of the proposed central road, a component of the design which exceeds Council standards for minimum parking requirements.
48. In the entrance section of the road, the applicant proposes grassed/landscaped berms, a 3 meter wide shared cycle and pedestrian footpath and stormwater swales which transition flush with the formed carriageway. Mr Kirkman notes general acceptance of this design, with the exception that he recommends a kerb and channel be installed on the north side of the carriageway to provide a physical barrier between vehicles and pedestrians. Throughout the remainder of the central road, the applicant has proposed low profile and mountable kerbs. Again, Mr Kirkman is not supportive of this design component, instead recommending the use of kerb and channel to discourage vehicles from parking on the footpaths and berms.
49. Overall, in terms of the proposed central road, there remain two design aspects in contention; the legal width of the road reserve and the use of kerb and channel along the formed carriageway. In terms of the width of the road, I note that the actual formed width of the proposed carriageway complies with Council standard. In this context, it can be concluded that the physical road width will ensure an acceptable level of internal traffic efficiency and safety for future residents, rubbish collection and the wider public. A

reduction in legal width primarily impacts on Council as the future owner of the road reserve upon vesting. A reduced legal width provides less available land for the servicing requirements of reticulated infrastructure and for potential future upgrades to the road. Conversely, a reduced legal width can reduce Council maintenance obligations within the road reserve. On this matter, I defer to the expert advice of Mr Kirkman who has weighed Council's position into his recommendations. I have recommended that the central road be provided with a 20 meter legal width. As the applicant also owns the property at 157 Dunstan Road, achieving the legal width along the length of the road is possible through a boundary adjustment. Dependent on how this is accommodated, this may have the effect of reducing the size of the adjacent residential allotments. Regardless, the overall density across the site would be unchanged in the instance that the legal width is increased as density for a CRD is calculated based on the entire site area.

50. I also agree with Mr Kirkman's recommended use of kerb and channel along the formed carriageway. A physical barrier between vehicles and pedestrians will improve safety and will concurrently protect the berm and footpath assets from damage due to vehicles mounting and parking on them. This is included within my recommended conditions of consent.
51. The proposal includes the use of several right of ways to provide access to rear allotments (A, B, D, E and F). Mr Kirkman has accepted the applicants reduced carriageway width of 3 meters noting the inclusion of two 1.5 meter berms on either side of the formed access, which can allow for vehicles to pass using the berm adjacent to the higher side of the carriageway, if required. I have recommended conditions of consent relating to the formation of these rights of way.
52. The proposal includes the use of a right of way to provide access to six allotments (16 to 21). Council standards limit the number of allotments served by an urban right of way to 4, with the proposed allotment arrangement requiring the formation of the access to Council's cul-de-sac standard and vested. Mr Kirkman recommends that the proposal be redesigned to include a cul-de-sac to serve these lots, noting that there are no physical constraints which would prevent this formation and noting improved community outcomes to support future growth. Mr Kirkman additionally advises that the proposed right of way is unlikely to be able to physically support the underground servicing infrastructure needs for six allotments within the confines of the right of way. The ability for Council to collect rubbish from these allotments is also a consideration, on the basis that a rubbish truck will not be able to access the right of way, and that there may not be adequate space for up to 18 additional rubbish bins on the cul-de-sac head. In principle I find myself agreeing with Mr Kirkman in this regard, and consider that either a cul-de-sac should be provided to service these 6 allotments or the allotment configuration changed to limit the number of allotments serviced by this right of way to 4. I do note that there are constraints in terms of topography and site boundaries which would need to be considered in the instance that there be a slight re-design to accommodate a cul-de-sac. I encourage the applicant to respond to these recommendations at the hearing.
53. Mr Kirkman has also recommended that an additional road connection be provided to the land to the northwest, noting that this land has also recently been rezoned to LLRZ and has a high likelihood of more intensive development. In her urban design review, Ms Bitossi also recommended a future road connection to the northwestern boundary to support a more connected movement network across the wider area. I agree with the expert opinions of both Mr Kirkman and Ms Bitossi that roading connectivity provides for improved patterns of development, particularly in this area where the existing title configuration of linear rectangular allotments with short frontages to Dunstan Road could potentially result in multiple narrow developments serviced by singular cul-de-sacs. I am supportive of an additional roading connection, and consider that this may be accommodated by converting and shifting one of the proposed right of ways on the western side of the development. Again, a configuration of allotments and accessways is unlikely to increase the density of the subdivision beyond the 1,500m² threshold.

54. Overall, I consider that the proposed access arrangements are generally appropriate. The following issues remain in contention and it would be helpful for the applicant to consider the following for the hearing:
- (a) Increasing the legal width of the central road to 20 meters
 - (b) The use of kerb and channel edgeways on all formed carriageways
 - (c) The construction of a cul-de-sac to service allotments 16-22 or a reduction in the number of allotments accessing from the right of way G/H/I.
 - (d) A future road connection to the northwest.

The provision of landscaping, including road berms

55. The subdivision proposes grass berms and street trees internally within the development. This is appropriate and in accordance with Council standards. In light of recent changes to the rating of domestic water, Council requires any berms, street trees and public recreation areas to be provided with irrigation water from a bore and reticulated through the subdivision. Conditions are recommended to require the detailed plans of this reticulation be supplied to Council at Engineering Approval stage.
56. The proposed allotments are of a sufficient size to provide adequate areas for future successors in title to establish landscaping.
57. Overall, the landscaping provided by the proposed berms, street trees and recreation reserve are sufficient and acceptable in the context of the development.

Earthworks necessary to prepare the site for development, occupation and/or use, including earthworks associated with contaminated land

58. Earthworks proposed as part of the application relate to the formation of roads, accessways, creation of stormwater soakpits, trenching of services and land disturbance associated with the removal of existing buildings and structures. The extent of earthworks required to establish built form on proposed Lots 16-22 was raised in a submission from the adjacent property owner at 149B Dunstan Road. The proposal seeks consent for the establishment of the subdivision (roading and services installation), with any specific earthworks associated with future development of the allotments subject to District Plan provisions at the time of development. The current earthworks provisions set a permitted baseline of 200m³ per allotment. On this basis, I am satisfied that any further earthworks beyond permitted activity levels necessary to establish residential activity on this steeper land will be subject to the appropriate scrutiny through a future resource consent process.
59. The applicant has not proposed any specific sedimentation controls for the proposed earthworks, however they have noted that resource consent is required from ORC for the earthworks. On the basis that a level of jurisdiction remains with Council for earthworks, it is critical to consider that earthworks have the potential to adversely affect the amenity values of neighbouring properties, water quality and landscape character. These effects can relate to sediment discharge including dust, construction noise and the visual impact of a large, exposed construction site.
60. Although the volume of earthworks exceeds the permitted activity levels, the location, topography, volume and areas of the excavation is commensurate with the size of the development in terms of total land area. There are no water bodies or sensitive receptors within close proximity to the proposed land disturbance and the earthworks are likely to be able to be suitably managed using best practice site and sediment management controls without adverse impacts on the environment. I have recommended conditions of consent to this effect.
61. A Detailed Site Investigation (DSI) has been provided which covers the parts of the site at 155 Dunstan Road. The DSI confirms that resource consent is required pursuant to Regulation 10 of the NESCS due to the presence of contaminants which exceed the residential limits at 155 Dunstan Road. The total volume of contaminated soils on the

site is estimated at 10m³. A DSI undertaken previously for 157 Dunstan Road confirms potential contamination associated with an on-site wastewater disposal system, however this is located on a part of the site which is not subject to this application.

62. The application includes a Remediation Action Plan (RAP), as recommended within the DSI. This RAP details two potential remediation actions; offsite disposal of contaminated material and use of a containment cell beneath the vested road, with these remediation works requiring further resource consent from Otago Regional Council. A Site Validation Report (SVR) is recommended within four weeks of the completion of the remediation.
63. The use of a containment cell beneath the vested road passes the ongoing liability of managing these contaminated soils to Council which may impact on future works and maintenance of the road. In my opinion, it is more appropriate that the affected soils be removed from the property by the consent holder and disposed of at a licensed facility. The applicant proposes the imposition of conditions of consent which require suitable remediation in accordance with a RAP and Contaminated Site Management Plan. I consider this to be appropriate to manage potential adverse effects from the contaminated soil present on the site. I have recommended conditions to this effect which require the removal of the contaminated land to a licensed facility.

Subdivisional design including the shape and arrangement of allotments

64. The subdivisional design generally appears logical given the shape, location, orientation and topography of the site. All allotments access internally within the site which confines all traffic movements to a singular access point from Dunstan Road.
65. The lot layout provides for residential allotments that will accommodate generally compliant built form, although the applicant has applied for breaches of the road setback, internal setback and building coverage performance standards related to future built form. I understand in speaking with the applicant that the application seeks consent for these breaches across allotments 1-3, however this should be confirmed formally at the hearing. Ms Bitossi has noted that these breaches may result in a slight increase in perceived density internally or as visible from 157 Dunstan Road which is also owned by the applicant, allowing any effects on the amenity of this property to be disregarded.
66. As outlined above, both Mr Kirkman and Ms Bitossi consider that the subdivisional design would be improved by road connectivity to the northwest. However, as otherwise, I consider that the shape and arrangements of the allotments is appropriate.

The provision of, or contribution to, the open space and recreational needs of the community

67. Both the District Plan and Council's Open Space and Recreation Strategy provide guidance on the provision of public open space where new allotments are created. Policy direction in the District Plan (SUB-P1) directs that where new allotments are created, that they are adequately served by public open space that is accessible, usable and well-designed. In addition, policy SUB-P2 describes opportunities for the dual use of public open space with stormwater infrastructure and/or walking and cycle connections. Similarly, Council's Open Space and Recreation Strategy aims to achieve a connected open space network where most residential areas have a neighbourhood park within a 500m radius. Neighbourhood parks are described within this strategy as areas used for informal recreation, sporting activities, play and family-based activities and social and community activities
68. The applicant proposes Lot 29 to be vested as a public recreation reserve (park). The park is to be located on land of flat topography and sized at approximately 1,410m². The proposed park lies immediately south of the future road connection which will assist in providing increased road frontage for public access. In this location, the park will be directly visible from Dunstan Road which is likely to have positive effects in terms of usability and streetscape amenity.

69. The applicant intends to develop the park with a landscaping plan and park furniture. Council typically prefers low maintenance landscape designs, and suggests that the final design be submitted for certification to Council's Parks Manager during Engineering Approval. I consider this to be an appropriate process and have recommended a consent condition to this effect.
70. The park is not adjacent to any residential allotments and therefore will not require any covenants under the Fencing Act 1978 waiving Council's obligation to contribute to the cost of fencing under that Act.

The provision of buffer zones adjacent to roads, network utilities or natural features

71. The proposed accessway is located within 32 metres of the Roxburgh-Islington A (Nth) 220k V transmission line. The application is supported by a comment from Transpower, as the operator of this transmission line which is located to the south-east of the site. Transpower identify that both the creation of allotments and the earthworks associated with accessway construction will occur within proximity of the transmission lines. Transpower confirm that any works will need to comply with the requirements of NZECP, which the applicant has accepted and adopted as part of the proposal. Subject to compliance with the NZECP, adverse effects on the transmission network are not anticipated. No other buffer zones are necessary for this proposal. There are no other particular roads, network utilities or natural features that warrant the provision of a buffer zone.

Provision for pedestrian and cycle movement, including the provision of, or connection to, walkways and cycleways

72. The proposal provides for adequate and appropriate pedestrian and cycle movement internally within the subdivision. The footpaths are proposed to terminate at the entrance to the development on Dunstan Road and there is currently no connecting footpath along Dunstan Road or any form of formal crossing point across Dunstan Road to the Central Otago Rail Trail in the vicinity of the site. As Dunstan Road becomes progressively developed in accordance with the new residential zoning, Council may need to consider a wider strategy for footpath connectivity along Dunstan Road. For example, whether a footpath is to be extended along the eastern side of the carriageway or whether the Central Otago Rail Trail be relied upon, supported by safe crossing points. Given that the site contains only a narrow frontage onto Dunstan Road and there is no wider implementation of a footpath strategy, I defer to the advice received from Mr Kirkman which does not include a recommendation for footpaths along Dunstan Road. There are options for installing advance warning signage for motorists, or constructing a more formal crossing point. The applicant may wish to consider this matter for discussion and consideration at the hearing.

Any financial contributions necessary for the purpose set out in Section 15 of the District Plan

73. A development/financial contribution demand has been calculated in accordance with Council's Policy on Development and Financial Contributions effective from 1 July 2021. Financial contributions have been assessed as follows:

Activity	Payment
Water Supply	\$227,217.30 +GST
Wastewater	\$240,026.10 +GST
Reserves	\$73,231.38 +GST
Roading	\$52,200.00 +GST
Total	\$592,674.78 +GST

The contributions are payable prior to the issuing of Section 224(c) certification under the RMA.

Any measures required to address the potential for reverse sensitivity effects to arise in relation to existing activities undertaken on adjoining land

74. Adjacent properties to the northwest, southeast and south have recently been rezoned to residential zoning under Plan Change 19 of the District Plan. Until these sites are further developed consistent with the residential zoning, rural activities are likely to continue to occur on these properties, and also on the properties adjoining the site which have retained Rural Residential Resource Area zoning. Rural activities in close proximity to the development may have an impact to residential amenity values. This includes, but is not limited to, frost fighting, bird scaring, stock handling, hay making, chemical spraying and pest control associated with horticultural, viticultural and agricultural activities. The proposed allotment sizes do not provide much opportunity for future successors in title to ensure that residential dwellings are sited, designed and screened to mitigate potential reverse sensitivity effects from these activities. Whilst not materially reducing the effects of reverse sensitivity, I have recommended a consent notice condition which alerts future owners of the usual incidences of these types of activities occurring on adjacent land. This will sufficiently acknowledge to potential purchasers that not all of the wider locality is currently residential in nature. Adverse effects in this regard are assessed as less than minor.

The provision of esplanade strips or reserves

75. No requirement for esplanade strips or reserves has been identified.

COMPREHENSIVE RESIDENTIAL DEVELOPMENT

76. Policy LLRZ-P9 of the District Plan describes the purpose of a CRD as providing for a higher density of development on larger sites which provides for a variety of lot sizes and opportunities for diversity of housing types, responds to the context and characteristics of the site, retains the overall character of the surrounding area and delivers a public benefit.

Provision for housing diversity and choice

77. Ms Bitossi notes that the proposal aligns with the density expectations of the CRD provisions for the LLRZ which requires a density across the site no greater than 1 dwelling per 1,500m². The allotment sizes range between 840m² and 1,940m² which provides balance and variation in allotment sizes. This directly translates to providing opportunities for housing diversity and choice in line with the anticipated built form outcomes of the LLRZ, particularly when considering that there are ancillary provisions enabled through Plan Change 19 which further increase options for this diversity such as the inclusion of minor residential units on the resultant allotments.

78. I consider that the application adequately responds to this aspect of the CRD provisions.

How the development responds to the context, features and characteristics of the site, and

Measures proposed to ensure higher density areas do not detract from the character and amenity of the wider surrounding area

79. In her report, Ms Bitossi assessed how the proposal responds to both the existing site characteristics and the character of the surrounding area, noting that the future character of the locality is likely to alter with the recently introduced LLRZ. Ms Bitossi was also asked to consider and address matters raised in the submissions in this regard.
80. Ms Bitossi notes that there are two distinct areas within the proposed development which represent a higher density of development. While this situation is anticipated by the CRD provisions, it is critical to ensure that these areas of higher density maintain the

expected large lot density characteristics of the zone, particularly as perceived externally from the site. In this situation, the site also represents a transition between a residential zone and a rural zone and hence, the maintenance of the rural character of the locality is also a consideration.

81. Lots 1 to 3 represent a node of higher density, mostly as a result of their smaller size and their configuration with a right of way occupying the western boundary of the sites. On the basis that built form within these allotments is likely to be more constrained, the applicant has requested consent for road and boundary setback breaches as well as a breach of building coverage on these allotments. This will have the effect of an overall perceived increase in density. I agree with Ms Bitossi that the visual effects of such are predominantly internalised within the site or most likely to be visible from 157 Dunstan Road which is also owned by the applicant.
82. While not specifically addressed by Ms Bitossi, proposed lots 23-27 also represent an area of higher density within the development. These allotments are all sized at 840m², which in isolation, represents a departure from the density provided for a conventional subdivision in the LLRZ. I do not believe that the applicant has applied for road boundary setback breaches on these allotments, meaning that future houses are likely to be positioned more towards the boundary with 149 Dunstan Road. In response, Ms Bitossi has recommended that these allotments be subject to the imposition of a reduced 4.5m setback from the central road and a 10m building setback from the external boundary. This looks to provide a balance between ensuring that dwellings do not dominate the streetscape (as viewed internally) while also allowing space for planting along the external boundary that can filter and eventually screen views of future dwellings from this neighbouring property.
83. The proposed allotments on the north-eastern portion of the site (Lots 16-22) represent a discrete area of LLRZ land that projects into the surrounding Rural Residential Resource Area. In addition, this portion of the site rises in topography and sits elevated above the remainder of the site which increases overall visibility from the surrounding area. A submission in opposition to the proposal was received from the property at 149B Dunstan Road outlining concerns over density in this part of the site and earthworks associated with the proposal. Ms Bitossi has recommended that the configuration of allotments in this particular area be amended to reduce the density in this part of the site. Ms Bitossi has suggested the division of proposed Lot 15 located on the flatter part of the site to offset the removal of one allotment from the more elevated land. She notes that this would have the effect of maintaining the overall yield, while supporting a more appropriate interface with the Rural Residential land to the east. On reviewing the scheme plan, there does not appear to be any physical constraints to this suggestion and it may alleviate some of the concerns of the submitter from 149B Dunstan Road. There may also be associated advantages to reducing the demand (and servicing requirements) on the proposed right of way which serves this part of the site. However, I do note that the overall density on this part of the site would equate to 1 dwelling per 1,447m² which is only fractionally smaller than anticipated for the LLRZ. It would be helpful for the applicant to respond to this suggestion at the hearing, however I do not consider this to be fatal to the application and in the instance that the applicant does not adopt this suggestion, I remain of the opinion that the proposal appropriately responds to the context, features and characteristics of the site.
84. A submission in opposition to the proposal was received from the owner of 165 Dunstan Road. The submitter raised concerns about the effects of the proposed density on future and present amenity values and the proximity of future residential dwellings to their driveway which supports an existing commercial use. While the submission was received on a previous iteration of the proposal, the applicant now proposes to create 8 allotments adjoining the shared boundary with 65 Dunstan Road (compared to 7 in the notified proposal), ranging in size from 860m² to 1,940m². Ms Bitossi notes that this configuration of allotments is consistent with CRD provisions but potentially places 1 or 2 additional allotments closer to this boundary than would be anticipated by a

conventional LLRZ subdivision. Ms Bitossi recommends the imposition of a 10m building setback for this boundary to provide space for landscape screening and to mitigate effects on residential amenity on this neighbour. In terms of reverse sensitivity effects, I have recommended consent notice conditions which highlight the instances of rural activities in the locality to future landowners. I consider potential reverse sensitivity effects to be adequately managed.

85. A further submission in opposition was received from the owner of the property at 147 Dunstan Road, citing non-compliance with density provisions of the District Plan. The proposal now includes an area of public open space adjacent to the boundary of this property, with no directly adjoining residential allotments. The central road runs directly adjacent to the boundary with 147 Dunstan Road, which will result in the concentration of traffic movements along the boundary. While this may create an effect, the traffic movements are considered to be directly anticipated by way of the consistency of the proposal with the density provision for a CRD in the LLRZ. The access road is also located within an area which currently serves as an access handle to the site. In this context, I find any adverse effects on this party to be as anticipated by the District Plan, and appropriate.
86. Whilst I acknowledge both Ms Bitossi's suggested mitigations and the concerns raised in the submissions, I also recognise that the use of the CRD provisions is a legitimate consenting pathway available to the applicant to enable the imbedding of flexibility in subdivisional design. On balance, I do not envisage that the imposition of a 10m building setback to external boundaries would result in a significant level of constraint on future landowners. Ms Bitossi has envisioned that this would create a buffer to provide an appropriate screening and softening opportunity to adjacent properties. This can act to maintain residential amenity values and reduce the effects associated with areas of higher density within the development. The mechanism to impose such a requirement would be through a consent notice condition, whereby future lot owners which have an external boundary be required to landscape a 10m strip. I have deferred to Ms Bitossi's expertise in this regard and have included a placeholder consent notice condition to this effect which the applicant may wish to respond to and consider the wording of.

The extent to which the proposal provides wider community benefits, increased opportunities for connectivity or community facilities, and

**The location, extent and quality of public areas and streetscapes, and
Integration with transport networks including walking and cycling**

87. The lack of wider community benefit resulting from the proposal was a matter raised in the submissions. The applicant responded with the inclusion of a 1,410m² area of public open space to be vested in Council as recreational reserve. Ms Bitossi notes that the proposed park is well located, being bounded by roads on two sides which increases access, informal surveillance and visibility, particularly from the entrance to the subdivision and from Dunstan Road. She also notes that it is of a sufficient size to accommodate seating, informal gathering and modest play equipment. The park is sized in line with expectations for a neighbourhood park in Council's Open Space and Recreation Strategy. I agree with Ms Bitossi that the provision of this public open space adequately provides for wider community benefits.
88. Ms Bitossi notes that the road typologies proposed by the applicant allow adequate space for planting and large scale street trees which will contribute to a safe and attractive streetscape environment. I agree with this, and note that the recommended conditions of consent require the applicant to confer with Council's Parks Manager when planting and locating street trees to ensure they are suitable and able to be easily maintained and irrigated. Ms Bitossi also notes that the proposed plans include stone entry walls and integrated signage at the Dunstan Road entrance. Ms Bitossi comments that this treatment may give the impression that the road and open space is private which may discourage public access. I also question whether Council will want to inherit the ongoing ownership and maintenance of these structures when the road is vested. For

these reasons, I recommend the applicant consider the removal of these from the application.

89. In terms of connectivity, the applicant has provided cycle and pedestrian footpaths through the proposed subdivision to connect to the Central Otago Rail Trail on the opposite side of Dunstan Road. From this connection, there are multiple community recreational facilities within a short distance including the swimming pool, ice rink, netball courts, Molyneux Stadium and the bike tracks.
90. As outlined above, both Ms Bitossi and Mr Kirkman have recommended that one further future road connection point be included in the subdivision design to facilitate connection to land to the northwest. I agree that this would enable potential linkages to adjoining properties to support a more connected movement network across the wider area.
91. Overall, I am satisfied that the proposal as it stands provides for wider community benefits and opportunities for connectivity. Connectivity could be enhanced through one further roading connection.

How the configuration of lots will allow for development that can readily achieve the outcomes sought in LLRZ-P1

92. LLRZ-P1 ensures that built form within the LLRZ provides for reasonable levels of privacy, outlook, access to sunlight, on-site parking, spaciousness around buildings, generous outdoor living space, screening of storage areas and encourages water efficiency measures.
93. The proposed allotments are generally orientated in a manner which will not constrain design which achieves good solar gain and reasonable levels of privacy and outlook. The sites are sized to provide ample space for landscaping and the creation of outdoor living areas. No concerns are identified with respect to these matters.

Breach of performance standard – Building coverage

94. The original proposal sought a breach of building coverage standards for the smallest proposed lots within the subdivision. At the time of writing, I understand that the applicant seeks consent for breaches on Lots 1-3, however the extent of the breaches have not been specified. The applicant will need to confirm this at the hearing. I note that proposed Lots 1 and 2 are the most constrained with net areas of 700m² and 670m² respectively. Regardless, effects of a building coverage breach on these allotments will be internal to the subdivision or viewable from 157 Dunstan Road which is owned by the applicant. As a result, effects in this regard in relation to residential character, dominance of built form or perceived levels of open space are internalised to the applicant.

Breach of performance standards – Road boundary setback

95. The applicant has indicated that they seek consent for a road boundary setback breach of 4.5 meters in relation to Lot 1. Ms Bitossi notes that this proposed breach is considered acceptable from an urban design perspective. Ms Bitossi has recommended road boundary setbacks of 4.5 meters be applied to the smaller allotments in the subdivision (for example lots with an area less than 900m²) to provide more buildable area within each site in light of the proposed 10 building setback/landscaped buffer to the rear boundary. Ms Bitossi notes that a reduced setback of this nature may result in a slightly more urbanised streetscape but an improved outcome for the interface with the adjacent lower density properties. I am generally supportive of this recommendation, however I am conscious that the applicant would need to agree for consent to be granted for this. In the instance that the applicant seeks this consent, the breach would relate to the internal roading network and would not be of a scale that would have any adverse effect on the safety and efficiency of the road. In terms of dominance effects, these would be internal to the site and future occupants will be cognisant of the nature of the development proposed within the application through due diligence. Effects on streetscape amenity and values are assessed as less than minor.

Breach of performance standards – Internal boundary setback

96. The applicant has indicated that they seek consent for internal boundary setback breaches in relation to Lots 1-3. As above, these breaches would be internal to the subdivision and to the applicant. Whilst it may result in a reduction in the general sense of openness on these allotments, when considering the application of the CRD provisions, the presence of higher density built form is an outcome which is anticipated. In this regard, I find that a breach of the internal boundary setbacks on Lots 1-3 to be appropriate and without adverse effects on adjacent properties.

SUBSTANTIVE RECOMMENDATION ASSESSMENT

97. In accordance with Section 104(1)(a) of the Resource Management Act 1991, the actual and potential adverse effects associated with the proposed activity have been assessed and outlined above. Relying on the above assessment, I consider that any adverse effects arising from the subdivision and comprehensive residential development are able to be adequately managed through conditions of consent and are therefore acceptable overall.

OFFSETTING OR COMPENSATION MEASURES

98. In accordance with section 104(1)(ab) of the Resource Management Act 1991, there are no offsetting or compensation measures proposed or agreed to by the applicant that need consideration.

OBJECTIVES AND POLICIES**Central Otago District Plan**

99. In accordance with section 104(1)(b) of the Resource Management Act 1991, the objectives and policies of the Central Otago District Plan were taken into account when assessing the application.

Objective /Policy	Provision
4.3.1 Objective – Needs of the Districts People and Communities	To recognise that communities need to provide for their social, economic and cultural wellbeing, and for their health and safety at the same time as ensuring environmental quality is maintained and enhanced
4.3.3 Objective – Landscape and Amenity Values	To maintain and where practicable enhance rural amenity values created by the open space, landscape, natural character and built environment values of the District's rural environment, and to maintain the open natural character of the hills and ranges.
4.3.7 Objective – Soil Resource	To maintain the life-supporting capacity of the District's soil resource to ensure that the needs of present and future generations are met
4.4.2 Policy – Landscape and Amenity Values	To manage the effects of land use activities and subdivision to ensure that adverse effects on the open space, landscape, natural character and amenity values of the rural environment are avoided, remedied or mitigated through: <ul style="list-style-type: none"> a. The design and location of structures and works, particularly in respect of the open natural character of hills and ranges, skylines, prominent places and

	<p>natural features,</p> <ul style="list-style-type: none"> b. Development which is compatible with the surrounding environment including the amenity values of adjoining properties, c. The ability to adequately dispose of effluent on site, d. Controlling the generation of noise in back country areas, e. The location of tree planting, particularly in respect of landscape values, natural features and ecological values, f. Controlling the spread of wilding trees. g. Encouraging the location and design of buildings to maintain the open natural character of hills and ranges without compromising the landscape and amenity values of prominent hillsides and terraces. h. Strongly discouraging buildings in the Rural Resource Area of the Wooing Tree Overlay Area to ensure a vineyard or treed park-like character with an absence of built form.
4.4.3 Policy – Sustainable Management of Infrastructure	<p>To ensure that the development of infrastructure in the rural environment promotes sustainable management by:</p> <ul style="list-style-type: none"> a. Requiring developers to contribute a fair and reasonable proportion of the costs involved, and b. Maintaining and enhancing the safe and efficient operation of the infrastructure network (including roading), while avoiding, remedying or mitigating adverse effects.
4.4.6 Policy – Adverse effects on the soil resource	<p>To ensure that the location, construction and/or operation of land use activities and subdivision make adequate provision for the protection of the soil resource by avoiding, remedying or mitigating the adverse effects of practices which may cause:</p> <ul style="list-style-type: none"> a. Erosion, instability or loss of topsoil, b. Loss of nutrient or incidence of soil contamination, c. Loss of soils with special qualities, d. A reduction in vegetation cover and moisture holding capacity, and e. Soil compaction.
4.4.8 Policy – Adverse effects on the amenity values of neighbouring properties	<p>To ensure that the effects associated with some activities including (but not limited to):</p> <ul style="list-style-type: none"> a. Noise (including noise associated with traffic generation, night time operations), and vibration, b. The generation of a high level of traffic, in particular heavy vehicles, c. Glare, particularly from building finish, d. A reduction in visual amenity due to excessive signage and the storage of goods or waste products on the site, e. The generation of odour, dusts, wastes and hazardous substances, and f. The use and/or storage of hazardous goods

	<p>or substances</p> <p>do not significantly adversely affect the amenity values and privacy of neighbouring properties or the safe and efficient operation of the roading network.</p>
<p>4.4.10 Policy – Rural subdivision and development</p>	<p>To ensure that the subdivision and use of land in the Rural Resource Area avoids, remedies or mitigates adverse effects on:</p> <ul style="list-style-type: none"> a. The open space, landscape and natural character amenity values of the rural environment in particular the hills and ranges, b. The natural character and values of the District’s wetlands, lakes, rivers and their margins, c. The production and amenity values of neighbouring properties, d. The safety and efficiency of the roading network, e. The loss of soils with special qualities, f. The ecological values of significant indigenous vegetation and significant habitats of indigenous fauna, g. The heritage and cultural values of the District, h. The water quality of the District’s surface and groundwater resources, and i. Public access to or along the rivers and lakes of the District, <p>particularly through the use of minimum (and average) allotment sizes.</p>

100. While the objectives and policies for the Rural Resource Area contained within Chapter 4 of the District Plan are technically applicable to the proposal, they are not considered relevant to this activity given the zoning applied to the site through Plan Change 19 and the relief sought in the appeal. I have not placed weight on these objectives and policies.

Objective /Policy	Provision
<p>16.3.1 Objective - Adverse Effects on the Roothing Network</p>	<p>To ensure that subdivision avoids, remedies or mitigates adverse effects on the safe and efficient operation of the District’s roading network.</p>
<p>16.3.2 Objective - Services and Infrastructure</p>	<p>To ensure that subdivisions provide all necessary services and infrastructure without adversely affecting the public interest and the ongoing viability of those services and infrastructure.</p>
<p>16.3.4 Objective - Amenity Values</p>	<p>To ensure, where appropriate, that amenity values of the District created by the open space, landscape and natural character values, and areas of significant indigenous vegetation, significant habitat of statutorily managed sports fish and game are not adversely affected by subdivision.</p>

16.3.5 Objective - Water and Soil Resources	To ensure that subdivision does not facilitate development that may compromise the life-supporting capacity of the District's water and soil resources.
16.3.6 Objective - Heritage Values	To ensure that subdivision does not facilitate development that may adversely affect heritage and cultural values including cultural values of importance to Kai Tahu ki Otago.
16.3.7 Objective - Open Space, Recreation and Reserves	To ensure that subdivision contributes to the open space, recreation and reserve needs of the community.
16.3.8 Objective - Public Access	To ensure, where appropriate, that subdivision maintains and where appropriate enhances public access:
16.3.9 Objective - Physical Works Involved in Subdivision	To ensure that the physical works involved in preparing land that is part of the subdivision avoids, remedies or mitigates adverse effects on: <ul style="list-style-type: none"> a. The stability of land. b. Water quality within natural watercourses and the stability of their margins. Neighbouring properties in respect of the effects of noise, dust and vibration
16.3.10 Objective - Provision for Future Development	To ensure subdivisions are designed to facilitate an appropriate and co-ordinated ultimate pattern of development having regard to the particular environment within which the subdivision is located.
16.4.1 Policy - Adequate Access	To require that all subdivisions have legal and physical access that: <ul style="list-style-type: none"> a. Is of a standard that is adequate for the intended use of allotments having regard to current and likely future traffic levels and the safe and convenient movement of vehicles and pedestrians, and b. That integrates with the existing roading network in a safe and efficient manner, except in circumstances where Council is satisfied that section 321(2) and (3) of the Local Government Act 1974 is to apply or where no new lots are to be created.
16.4.2 Policy - Existing Access	To encourage the use of existing access points to rural State highways and arterial roads to avoid or mitigate adverse effects on the safe and efficient operation of these roads.
16.4.3 Policy - Adequate Infrastructure	To require that the land to be subdivided is supplied with services and infrastructure that are adequate for the intended use of the land to be subdivided without the public interest being adversely affected.
16.4.6 Policy - Construction Standards	To require that all physical works within subdivisions are designed and constructed in accordance with NZS 4404:1981 which is the Council's Subdivision Code of Practice unless Council determines modification of this code is necessary given the local conditions and particular

	circumstances affecting the subdivision.
16.4.7 Policy - Subdivision Design	<p>To require that the design of subdivision, where relevant to the intended use, provides for the following matters:</p> <ol style="list-style-type: none"> a. Facilitates convenient, safe and efficient access to all allotments including pedestrian access where appropriate. b. Facilitates the safe and efficient provision and operation of services and infrastructure. c. Facilitates access to passive solar energy resources. d. Facilitates any foreseeable subsequent development or redevelopment including the economic provision of roading and network utility services. e. Facilitates adequate provision of, or contribution to, the open space, recreational and reserve needs of the community with physical links to existing reserve areas where this is practicable. f. Facilitates an appropriate level of access to heritage sites, natural features and water bodies where appropriate. g. Facilitates development which keeps earthworks to a minimum. h. Facilitates retention of the heritage values of a site or area.

101. The subdivision has been assessed by Council's Development Engineer in consultation with Council's Three Waters Department. As noted in the assessment earlier in this report, the subdivision can be appropriately serviced with reticulated infrastructure and servicing installed in accordance with Council's engineering standards subject to conditions of consent.
102. Two of the accessways within the subdivision are proposed to be formed to a standard which does not meet Council standards contained within the Council's July 2008 Addendum to NZS 4404:2004. As outlined in the assessment above, one of the deviations from Council's standard relates to the legal width of road reserve for the central road through the subdivision. On the basis that the formed width complies with Council standard, I consider the central road to be adequate for its intended use in terms of safety and efficiency and consistent with policy 16.4.1.
103. The proposal seeks to form a right of way to access a total of six allotments. Council's standards currently require a maximum of four allotments from a right of way of this formation. I acknowledge the concerns of Council's Development Engineer and Council's Three Waters Department on the safety, efficiency and practicality of physically installing the necessary reticulated infrastructure within a right of way of this formation.
104. On this basis, I find the proposal to be inconsistent with policy 16.4.1 as the right of way servicing Lots 16-21 is not considered to be of a standard which is suitable for the intended use of the allotments and the safe and convenient movement of vehicles.
105. I also find the proposal to be inconsistent with policy 16.4.7 as it relates to the safe and efficient provision and operation of services and infrastructure resulting from the reduced legal width of the central access road and the right of way servicing six allotments.
106. The proposal includes provision for roading and servicing connection to adjacent land to the southeast. A recommendation has been outlined within this report that one further roading and servicing connection be provided to connect to adjacent land to the north. Provided this is undertaken, the provision of connections in both directions will facilitate

an appropriate and co-ordinated ultimate pattern of development consistent with objective 16.3.10 and policy 16.4.7.

107. Overall, I find the proposal in its current form to be inconsistent with objective 16.3.10 and policies 16.4.1 and 16.4.7.

Plan Change 19

108. In accordance with Section 104(1)(b) of the Resource Management Act 1991, the objectives and policies of Plan Change 19 were taken into consideration when assessing the application.

Objective	Supporting policies
LLRZ-01 Purpose of the Large Lot Residential Zone	The Large Lot Residential Zone provides primarily for residential living opportunities.
L L R Z - 0 2 Character and Amenity Values of the Large Lot Residential Zone	<p>The Large Lot Residential Zone is a pleasant, low-density living environment, which:</p> <ol style="list-style-type: none"> 1. contains predominantly low-rise and detached residential units on large lots; 2. maintains a predominance of open space over built form; 3. provides good quality on-site amenity and maintains the anticipated amenity values of adjacent sites; and 4. is well-designed and well-connected into the surrounding area.
LLRZ-P1 Built Form	<p>Ensure that development within the Large Lot Residential Zone:</p> <ol style="list-style-type: none"> 1. provides reasonable levels of privacy, outlook and adequate access to sunlight; 2. provides safe and appropriate access and on-site parking; 3. maintains a high level of spaciousness around buildings and a modest scale and intensity of built form that does not unreasonably dominate adjoining sites; 4. is managed so that relocated buildings are reinstated to an appropriate state of repair within a reasonable timeframe; 5. provides generous usable outdoor living space for residents and for tree and garden planting; 6. maintains the safe and efficient operation of the road network; 7. mitigates visual effects through screening of storage areas and provision of landscaping; and 8. encourages water efficiency measures.
L L R Z - P 9 Comprehensive Residential Development	<p>Provide for a higher density of development on larger sites, where development is undertaken in a comprehensive manner and:</p> <ol style="list-style-type: none"> 1. the overall layout provides for a variety of lot sizes and opportunities for a diversity of housing types while still being designed to achieve the built form outcomes in LLRZ-P1; 2. the design responds positively to the specific

	<p>context, features and characteristics of the site;</p> <p>3. areas of higher density development are located or designed so that the overall character of the surrounding area is retained; and</p> <p>4. the development delivers a public benefit, such as public access, reserves or infrastructure improvements</p>
SUB-O1 Subdivision Design	The subdivision of land within residential zones creates sites and patterns of development that are consistent with the purpose, character and amenity values anticipated within that zone.
SUB-P1 Creation of new allotments	<p>Provide for subdivision within residential zones where it results in allotments that:</p> <ol style="list-style-type: none"> 1. reflect the intended pattern of development and are consistent with the purpose, character and amenity values of the zone; and 2. are of a size and dimension that are sufficient to accommodate the intended built form for that zone; 3. minimise natural hazard risk to people's lives and properties; and 4. are adequately served by public open space that is accessible, useable and well-designed.
SUB-P2 Dual Use	<p>Recognise the recreation and amenity benefits of the holistic and integrated use of public spaces, through:</p> <ol style="list-style-type: none"> 1. encouraging subdivision designs which provide multiple uses for public spaces, including stormwater management and flood protection areas; and 2. integration of walking and cycling connections with waterways, green spaces and other community facilities.

109. The proposal results in reasonably large allotments which will provide for residential living opportunities at a density anticipated for the LLRZ. Lots are of an adequate size to ensure that there will be a predominance of open space over built form and which will provide good quality on-site amenity while being sufficiently set back to neighbouring sites. The applicant has considered how the development is connected to the surrounding locality, with a potential improvement to the level of connectivity recommended in the assessment above.
110. The specific policy relating to Comprehensive Residential Development is under appeal (LLRZ-P9). However, the proposal has been designed to comply with the provisions of the CRD framework by meeting the density requirements, delivering housing diversity and choice, providing community benefit and increased opportunities for connectivity and integrating with transport networks. The proposal represents a development which is consistent with the purpose, character and amenity values anticipated for a CRD within the LLRZ zone.
111. Overall, the proposal is assessed as consistent with the above objectives and policies.

Regional Policy Statements

112. The Operative Regional Policy Statement for Otago 2019 (RPS 2019) was made fully operative on 4 March 2024. Specific to this proposal are the following objectives and policies:

Objective	Supporting policies
<p>Objective 4.5 Urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments</p>	<p>Policy 4.5.1 Providing for urban growth and development</p> <p>Provide for urban growth and development in a strategic and co-ordinated way, including by:</p> <ul style="list-style-type: none"> a) Ensuring future urban growth areas are in accordance with any future development strategy for that district. b) Monitoring supply and demand of residential, commercial and industrial zoned land; c) Ensuring that there is sufficient housing and business land development capacity available in Otago d) Setting minimum targets for sufficient, feasible capacity for housing in high growth urban areas in Schedule 6 e) Coordinating the development and the extension of urban areas with infrastructure development programmes, to provide infrastructure in an efficient and effective way. f) Having particular regard to: <ul style="list-style-type: none"> i. Providing for rural production activities by minimising adverse effects on significant soils and activities which sustain food production; ii. Minimising competing demands for natural resources; iii. Maintaining high and outstanding natural character in the coastal environment; outstanding natural features, landscapes, and seascapes; and areas of significant indigenous vegetation and significant habitats of indigenous fauna; iv. Maintaining important cultural or historic heritage values; v. Avoiding land with significant risk from natural hazards; g) Ensuring efficient use of land; h) Restricting urban growth and development to areas that avoid reverse sensitivity effects unless those effects can be adequately managed; i) Requiring the use of low or no emission heating systems where ambient air quality is: <ul style="list-style-type: none"> i. Below standards for human health; or ii. Vulnerable to degradation given the local climatic and geographical context; j) Consolidating existing coastal settlements and coastal urban areas where this will contribute to avoiding or mitigating sprawling or sporadic patterns of settlement and urban growth.

	<p>Policy 4.5.3 Urban design</p> <p>Design new urban development with regard to:</p> <ul style="list-style-type: none"> a) A resilient, safe and healthy community; b) A built form that relates well to its surrounding environment; c) Reducing risk from natural hazards; d) Good access and connectivity within and between communities; e) A sense of cohesion and recognition of community values; f) Recognition and celebration of physical and cultural identity, and the historic heritage values of a place; g) Areas where people can live, work and play; h) A diverse range of housing, commercial, industrial and service activities; i) A diverse range of social and cultural opportunities.
	<p>Policy 4.5.4 Low impact design</p> <p>Encourage the use of low impact design techniques in subdivision and development to reduce demand on stormwater, water and wastewater infrastructure and reduce potential adverse environmental effects</p>
	<p>Policy 4.5.6 Designing for public access</p> <p>Design and maintain public spaces, including streets and open spaces, to meet the reasonable access and mobility needs of all sectors.</p>

- 113. The subdivision is located in an area which has recently been rezoned to provide for residential development in accordance with Council’s spatial plan for the district. Developments such as this are critical for meeting demand for housing. As outlined above, there are plans and funding in place to extend Council’s water and wastewater infrastructure to the site in an efficient and effective manner. Overall, I consider that the proposal is consistent with the key objectives and policies of the RPS 2019.
- 114. Decisions were released on the Proposed Regional Policy Statement 2021 (pRPS 2021) on 27 March 2024. The pRPS is currently under appeal and can be given little weight at this time. That said, I consider the proposal to be broadly consistent with the objectives and policies in this document.

SECTION 104D GATEWAY TESTS

- 115. Under Section 104D, Council must refuse a resource consent application for a non-complying activity unless it is satisfied that the proposal will either have minor effects on the environment, or the proposal will be consistent with the objectives and policies of the District Plan. If either of these gateway tests are met, the Panel can exercise its discretion under Section 104B.
- 116. In this case, I consider that the proposal will have no more than minor effects on the environment. The proposal has been identified to be inconsistent with some of the objectives and policies of the District Plan as it relates to the provision of access and

infrastructure. The proposal is not considered to be contrary to these objectives and policies. On balance, the proposal passes both gateway tests in Section 104D. The Commissioners can exercise their discretion to consider the proposal under Section 104B.

SECTION 104 (1)(C) - OTHER MATTERS

117. Having regard to section 104(1)(c) of the Resource Management Act 1991, no other matters are considered relevant.

SECTION 106

118. Section 106 of the RMA stipulates that a consent authority may refuse to grant a subdivision consent if it considers that there is a significant risk from natural hazards or sufficient provision has not been made for legal and physical access to each allotment. The site is not subject to risk from natural hazards. Legal and physical access is proposed from each allotment. Whilst some of the accessways are proposed to be formed to a standard which does not comply with Council's development and engineering standards, I am of the opinion that the provision for physical access is sufficient for the purposes of Section 106. Accordingly, I do not consider there any grounds for the subdivision consent to be refused.

PART 2 OF THE RESOURCE MANAGEMENT ACT

119. Based on the findings above, I consider that the proposal would satisfy Part 2 of the Resource Management Act 1991. Granting of consent would promote the sustainable management of District's natural and physical resources.

RECOMMENDATION

120. I recommend that the timeframe for the receipt of submissions be extended by two working days pursuant to Section 37A of the RMA to enable the consideration of the five late submissions. This minor extension to ensure include these submissions is not considered to have any material adverse effect on any person, the community or the applicant, and ensures that due consideration is given to the views of these persons.

121. After having regard to the above planning assessment, I recommend that the Commissioners grant consent to the proposed activity under delegated authority, in accordance with Sections 104 and 104B of the Resource Management Act for the following reasons:

- (a) The proposed subdivision and CRD will maintain the character and amenity values of the area and adjacent properties.
- (b) Subject to conditions of consent, the subdivision can be adequately serviced without adverse effects on the environment.
- (c) The proposal is inconsistent, but not contrary to, objective 16.3.10 and policies 16.4.1 and 16.4.7 of the District Plan as they relate to a co-ordinated ultimate patterns of development, adequate access and servicing requirements.
- (d) The proposal is otherwise consistent with the objectives and policies of District Plan and Plan Change 19.
- (e) The proposal gives effect to Part 2 of the RMA.

122. Should the Commissioners be of a mind to grant consent, I have attached a draft suite of conditions for consideration.



Tanya Copeland
TEAM LEADER - PLANNING

Date: 29 September 2025

SUBDIVISION CONDITIONS**Conditions:**

1. The subdivision must be undertaken in general accordance with the approved scheme plan attached to this certificate as Appendix One, and the information provided with the resource consent application received by the Central Otago District Council (Council) and referenced RC250095, except where modified by the following conditions.
2. Prior to commencement of any physical work the consent holder must apply for and receive Council Engineering Acceptance (EA) via the Council online portal. Either a letter of full EA is required, or an exemption letter provided from Council prior to Section 224(c) certification.

The EA application must include:

- a) Confirmation of who the representative is for the design and execution of the engineering work.
 - b) Provision of design: reports, calculations, specifications, schedules, and drawings, as applicable.
3. Producer Statements/Certificates must be submitted where appropriate as per NZS 4404:2004 in the form of:
 - a) Schedule 1A,
 - b) Schedule 1B,
 - c) Schedule 1C, and
 - d) Standalone Schedule 1B for 3 waters work.
 4. As-built drawings are to be lodged with the Council in accordance with clause 1.5.10(b) of NZS 4404:2004 and must comply with Council's "Specifications for as-built drawing documentation version 3.1". The as-built drawings are to be provided in *.dxf or *12da, and in *.pdf file format. New Zealand Vertical Datum (NZVD2016) must be used.
 5. Any subdivisional works undertaken as part of the accessway upgrade in proximity to the Roxburgh-Islington A (Nth) 220kV transmission line must be undertaken in compliance with the requirements of NZECP 34:2001.
 6. Prior to certification of the survey plan, pursuant to Section 223 of the Resource Management Act 1991, the subdivider must ensure the following:
 - a) If a requirement for any easements for services, including private drainage and access is incurred during the survey then those easements must be granted or reserved and included in a Memorandum of Easements on the cadastral dataset.
 - b) Lots 30 and 31 are to be vested as Road in Central Otago District Council
 - c) Lot 29 is to be vested as Recreation Reserve in Central Otago District Council.

General water/wastewater conditions

7. Prior to Section 224(c) certification, a new HDPE (PE100) DN125 (~106mm ID) principal watermain must be installed from the Dunstan Road watermain (once constructed), along the north side of the road serving the subdivision, and a HDPE (PE100) DN63 (~53mm ID) rider main must be installed on the south side.
8. Prior to Section 224(c) certification, individual standard HDPE (PE100) DN25 (~21mm ID) residential water connections must be provided off the new principle watermain along the north side, and off the rider main on the south side, such that no residential laterals are under the road carriageway. An Acuflo toby and meter assembly must be installed on the street side of each street-property boundary. If water toby boxes must be within vehicle accessway/crossings because other solutions are not feasible, they must be cast iron to support sustained traffic.
9. Prior to Section 224(c) certification, a manifold must be installed on a HDPE (PE100) DN63 (~53mm ID) from the new principal watermain up to the road boundary of the rights-of-way, and new individual standard HDPE (PE100) DN25 (~21mm ID) residential water connections installed from the manifolds to serve each of the lots without street frontage.
10. Prior to Section 224(c) certification, hydrants must be installed on the new water network for firefighting in accordance NZS4404 and SNZ/PAS4509:2008.
11. Prior to Section 224(c) certification, once Council has provided for wastewater servicing along Dunstan Road to enable a connection point for the subdivision, a new 150mm gravity wastewater main must be installed along the central road serving the subdivision.
12. Prior to Section 224(c) certification, new individual standard 100mm residential wastewater connections must be installed from the new 150mm wastewater main in the central road with cleaning eyes installed on the street side of each street-property boundary for each lot with road frontage. The connections for rear lots must have cleaning eyes installed at the right-of-way boundary and must be extended to the buildable/nett area of the lots along the rights-of-way.
13. If, to the satisfaction of the Group Manager – Three Waters Department (or their successor), engineering analysis confirms that a full gravity sewer system is not feasible, Council's Three Waters department (the department) may grant approval for a full or partial pressure sewer design. This design must comply with the standards specified by the department at the time of application for EA, and the extent of the pressure system will be at the department's discretion.
14. Prior to Section 224(c) certification, the consent holder must make provision for wastewater and potable water connections to land to the northwest and southeast of the site, within the allotment(s) to be vested as road in Council. Servicing connections must be provided if deemed necessary by the Group Manager – Three Waters or as part of EA.

Electricity and telecommunications

15. Prior to Section 224(c) certification, operational power and telecommunication services must be provided underground to the proposed lots, and for rear lots, ducts extended to the buildable area via the rights-of-way such that these services may be supplied at time of dwelling construction.

Roading

16. Prior to Section 224(c) certification, the leg-in (southwestern section) of the proposed road to serve the subdivision must be constructed and vested in accordance with the "Residential" Local Road standard under Table 3.1 of Council's 2008 addendum to NZS 4404:2004, with the following specific requirements and modifications:
- (a) Legal width of 20 meters minimum
 - (b) Formed carriageway width of 6 meters
 - (c) Subgrade requirements and metal depths to NZS4404:2004 and Council's July 2008 Addendum standards.
 - (d) Carriageway constructed to be a minimum of 30mm asphaltic concrete, or 2-coat chipseal.
 - (e) A minimum 3 meter wide concrete or asphaltic concrete shared footpath-cycleway must be constructed on the North side of the road and extended out to Dunstan Road to facilitate pedestrians and cyclists to cross to the Central Otago Rail Trail.
 - (f) Standard kerb and channel on the north side of the of the carriageway over 75mm compacted depth AP40 metal.
 - (g) Shallow side-swales on the south side of the carriageway, and concrete edge-break protection to the satisfaction of Council's Infrastructure Manager.
 - (h) Berms of 100mm depth clean topsoil at edge of road boundary formed with a 4% crossfall, trimmed and grassed to a mowable standard, or planted and landscaped.
 - (i) Stormwater must be disposed of by soakpit within the road reserve.
 - (j) LED street lighting in accordance with NZS 4404 and the CODC Public Spaces Lighting Policy.
 - (k) No parking lane is required.
 - (l) All necessary traffic signs and street markings are to be provided
17. Prior to Section 224(c) certification, the central (north-eastern) section of the proposed road to serve the subdivision must be constructed and vested in accordance with the "Residential" Local Road standard under Table 3.1 of Council's 2008 addendum to NZS 4404:2004, with the following specific requirements and modifications:
- (a) Legal width of 20 meters minimum.
 - (b) Formed carriageway width for traffic of 6.0m, plus 2 parking lanes of 2.5 meters width.
 - (c) Subgrade requirements and metal depths to NZS4404:2004 and Council's July 2008 Addendum standards.
 - (d) Carriageway constructed to be a minimum two-coat chip seal, standard concrete, or 30mm depth asphaltic, including parking lanes.
 - (e) A 19 meter diameter asphaltic concrete turning circle at the head of the cul-de-sac.
 - (f) Footpaths must be constructed to a minimum width of 1.5 meters constructed with concrete or asphaltic concrete on both sides of the road and extended around the cul-de-sac head.
 - (g) Standard kerb and channel on both sides of the carriageway over 75mm compacted depth AP40 metal, or, with the approval of Council's Infrastructure Manager, dish-channels between traffic and parking lanes.

- (h) Berms of 100mm depth clean topsoil at edge of road boundary formed with a 4% crossfall, trimmed and grassed to a mowable standard, or planted and landscaped.
 - (i) Stormwater must be disposed of by standard mudtanks and Y capped connections to soakpits within the road reserve.
 - (j) LED street lighting in accordance with NZS 4404 and the CODC Public Spaces Lighting Policy.
 - (k) All necessary traffic signs and street markings are to be provided.
18. Prior to Section 224(c) certification, the rights-of-way servicing proposed rear lots must be constructed to the Right-of-way standards in Table 3.1 of Council's 2008 Addendum to NZS 4404:2004 (2 – 4 Lots), as modified by the following:
- (a) Legal width of 6 meters.
 - (b) Formed carriageway width of 3.0m.
 - (c) Subgrade requirements and metal depths to NZS4404:2004 and Council's July 2008 Addendum standards.
 - (d) Stormwater must be disposed of by soakpit within the right-of-way.
 - (e) Carriageway to be minimum 30mm asphaltic concrete.
 - (f) For flexible pavements a concrete nib kerb must be provided along the high side of the carriageway.
 - (g) Standard kerb and channel must be provided along the lower side of the carriageway.
 - (h) Sealed vehicle entrances must be provided within the right-of-way to the boundary of Lots served from the right-of-way in accordance with Part 29 of Council's Roading Policies 2015.
 - (i) Heavy duty/commercial vehicle crossing to be installed from the central vested road to the rights-of-way in accordance with Part 29 of Council's Roading Policies 2015. Kerb design to include a minimum of 75mm concrete thickening and 3 re-bars placed central to reinforce the kerb line. Fibre reinforced concrete is a suitable alternative to standard concrete and 3 rebar. 150mm of compacted AP40 under the crossing.
 - (j) Berms of 100mm depth clean topsoil between the footpath/kerb and road boundary formed with a 4% crossfall, trimmed and grassed to a mowable standard. Alternatively, berms may be surfaced with schist or similar low maintenance material.
 - (k) Passing bays are required for rights-of-way longer than 50m in accordance with NZS4404:2004 and Council's 2008 Addendum.
19. Prior to Section 224(c) certification, the intersection from Dunstan Road to the proposed western section of the road to serve the subdivision must be constructed in accordance with Central Otago District Plan Figure 12.3 and New Zealand Transport Agency / Waka Kotahi Diagram E & Perspective E standard. The entire width of Dunstan Road at the intersection must be upgraded to asphaltic concrete for a length not less than 36m and to the satisfaction of Council's Infrastructure Manager.
20. Prior to Section 224(c) certification, new individual vehicle entranceways/crossings from the proposed central (eastern) road serving the subdivision must be constructed in

accordance with the requirements of Part 29 of Council's Roading Policies January 2015.

21. Prior to Section 224(c) certification, all necessary traffic signs and road markings must be provided to the satisfaction of Council's Infrastructure Manager.
22. The internal roading must have a posted speed limit of 40km/h.

Reserve and public areas

23. Prior to Section 224(c) certification, street tree planting must be undertaken in accordance with Council's 'District Tree Management and Operational Guideline 2011' and with automated irrigation provided. The planting must be undertaken in consultation with and to the satisfaction of Council Parks & Reserves Manager.
24. Prior to Section 224(c) certification, irrigation water for street trees, berms and all public areas vested in Council must be provided from a bore, with supply secured by appropriate easements.
25. Prior to Section 224(c) certification, reserve lot 29 must have a standard DN20mm [Or larger if required by Council's Parks and Recreation Manager] potable water connection installed to the lot boundary, with a standard toby/meter installed at the lot boundary.

Financial contributions

26. Prior to Section 224(c) certification, the consent holder must pay a reserves contribution calculated in accordance with Rule 15.6.1(1)(a)(i) of the District Plan. Details of the contribution are provided by Council via demand invoice.

Consent notices

27. Pursuant to Section 221 of the Resource Management Act 1991, consent notices must be prepared for registration on each of the certificates of title, for the following ongoing conditions:
 - a) Stormwater from buildings and impervious surfaces within lots must be either stored for beneficial re-use within the site, or be discharged to ground within the site using appropriately designed and constructed soakpits.
 - b) A minimum of two on-site carparking spaces must be provided within each allotment.
 - c) {PLACEHOLDER – external boundary setback/landscaped buffer}
 - d) Owners and occupiers of all allotments are aware of and will take reasonable and appropriate steps to advise all purchasers, lessees, licences or tenants, or any other users of;
 - I. Horticultural, viticultural, and agricultural activities that can occur as of right in the Rural Resource Area; and
 - II. The usual incidence of these activities including (but not limited to) stock handling, haymaking, chemical spraying, pest control (including by use of poison, night shooting and helicopters), deer stag roaring, irrigation, frost control and bird scaring, which may have amenity impacts beyond the boundaries of adjoining properties.

- III. The need for appropriate siting, design and screening of dwellings and other sensitive uses to mitigate adverse effects associated with noise and spray drift from adjacent horticultural activities.

LAND USE CONDITIONS – NESCS AND EARTHWORKS

1. At least 15 working days prior to any soil disturbance on the area identified as being potentially contaminated, the applicant must submit to Council a finalised version of the Remediation Action Plan (RAP) prepared by a suitably qualified and experienced person, with the content being in accordance with the Contaminated Land Management Guidelines Number 1: Reporting of Contaminated Sites in New Zealand (CLMG). The RAP must confirm that the contaminated material be removed from the site to a licensed facility and must not be encapsulated within proposed road reserve on the site.
2. Works must not start until Council has certified that they consider the RAP to be adequate to achieve their intended purpose.
3. The site must be remediated in accordance with the RAP approved under Condition 2.
4. A Site Validation Report (SVR) must be completed within four weeks of the remediation and submitted to Council for certification. The SVR must contain all relevant information recommended by the CLMG.
5. The earthworks and construction work is to be under the control of a nominated and suitably qualified person. The contact details of this person must be both submitted to Council prior to the commencement of earthworks on the site and written on a sign/board on the boundary of the site so as to be visible to the public
6. Any change in ground levels is not to cause a ponding or drainage nuisance to neighbouring properties.
8. Any fill material to be introduced to the site must comprise clean fill only.
9. The earthworks must be undertaken with the principles of industry best practice applied at all stages of site development including site stability, stormwater management, traffic management, along with dust and noise controls at the sites.
10. To ensure effective management of erosion and sedimentation on the site during earthworks and as the site is developed, measures are to be taken and devices are to be installed, where necessary, to:
 - (a) divert clean runoff away from disturbed ground;
 - (b) control and contain stormwater run-off;
 - (c) avoid sediment laden run-off from the site;
 - (d) mitigate dust emissions; and
 - (e) protect existing drainage infrastructure sumps and drains from sediment run-off.
11. All loading and unloading of trucks with excavation or fill material is to be carried out within the subject site.
12. The consent holder must:

- (a) be responsible for all contracted operations relating to the exercise of this consent; and
 - (b) ensure that all personnel (contractors) working on the site are made aware of the conditions of this consent, have access to the contents of consent documents and to all associated erosion and sediment control plans and methodology; and
 - (c) ensure compliance with land use consent conditions.
13. If during any site disturbance, the consent holder or subsequent owners:
- a) discovers koiwi tangata (human skeletal remains), waahi taoka (resources of importance), waahi tapu (places or features of special significance) or other Maori artefact material, the consent holder or subsequent owner must without delay:
 - i) notify the Consent Authority, Tangata whenua and Heritage New Zealand and in the case of skeletal remains, the New Zealand Police.
 - ii) stop work within the immediate vicinity of the discovery to allow a site inspection by Heritage New Zealand and the appropriate runanga and their advisors, who must determine whether the discovery is likely to be extensive, if a thorough site investigation is required, and whether an Archaeological Authority is required.

Site work may recommence following consultation with the Consent Authority, Heritage New Zealand, Tangata whenua, and in the case of skeletal remains, the New Zealand Police, provided that any relevant statutory permissions have been obtained.
 - b) discovers any feature or archaeological material that predates 1900, or heritage material, or disturbs a previously unidentified archaeological or heritage site, the consent holder must without delay:
 - i) stop work within the immediate vicinity of the discovery or disturbance; and
 - ii) advise the Consent Authority, Heritage New Zealand, and in the case of Maori features or materials, the Tangata whenua, and if required, must make an application for an Archaeological Authority pursuant to Heritage New Zealand Pouhere Taonga Act 2014; and
 - iii) arrange for a suitably qualified archaeologist to undertake a survey of the site.

Site work may recommence following consultation with the Consent Authority.
14. At the end of the works, any exposed areas must be top-soiled and seeded as soon as possible to limit sediment mobilisation.
15. Any areas of certified or uncertified fill must be identified on a plan, and the plan and certificates submitted to Council to be recorded against the property file.
16. The consent holder shall pay to the Council all required administration charges fixed by the Council pursuant to section 36 of the Act in relation to:
- a) Administration, monitoring and inspection relating to this consent; and
 - b) Charges authorised by regulations.

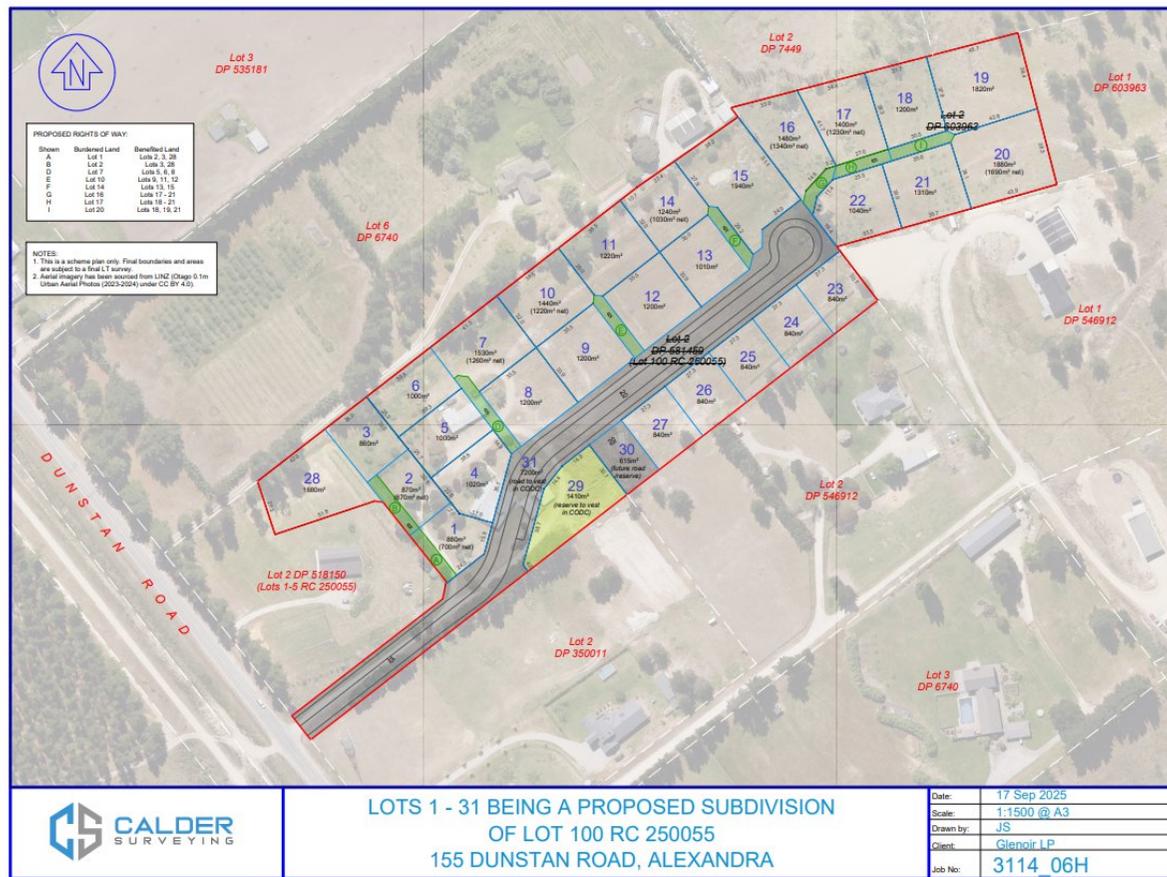
LAND USE CONDITION – PERFORMANCE STANDARDS BREACHES:

1. {PLACEHOLDER – for clarification as to the exact performance standard breaches. }

Advice Notes:General

1. Development and financial contributions are payable prior to the issuing of Section 224(c) certification, levied in accordance with Councils Policy on Development and Financial Contributions effective from 1 July 2021.
2. An approved 'Application to Connect' submission is required prior to connecting to Council's potable water and wastewater network.
3. Detailed water reticulation design must be assessed and granted for Engineering Acceptance (EA) before physical works commence.
4. It is the responsibility of the consent holder to obtain any necessary resource consents to take water in relation to any new sources of water. Any consents to take water will need to be transferred to Council's name at the time the reserve is vested.
5. Prior to upgrading or constructing a vehicle crossing, a 'Vehicle Crossing Application' submission and approval is required.
6. In addition to the conditions of a resource consent, the Resource Management Act 1991 establishes through sections 16 and 17 a duty for all persons to avoid unreasonable noise, and to avoid, remedy or mitigate any adverse effect created from an activity they undertake.
7. Resource consents are not personal property. The ability to exercise this consent is not restricted to the party who applied and/or paid for the consent application.
8. It is the responsibility of any party exercising this consent to comply with any conditions imposed on the resource consent prior to and during (as applicable) exercising the resource consent. Failure to comply with the conditions may result in prosecution, the penalties for which are outlined in section 339 of the Resource Management Act 1991.
9. The lapse period specified above may be extended on application to the Council pursuant to section 125 of the Resource Management Act 1991.
10. This is a resource consent. Please contact the Council's Building Services Department, about any building consent requirements for the work.

Appendix One – Subdivision scheme plan



CENTRAL OTAGO DISTRICT COUNCIL
S95A-F DECISION FOR RC250095
155 Dunstan Road, Alexandra

DESCRIPTION OF THE ACTIVITY

Subdivision

The application seeks subdivision Consent to subdivide the property at 155 Dunstan Road to create 30 residential allotments. In totality, the site comprises of 4.1ha.

The applicant seeks subdivision consent pursuant to the comprehensive residential development framework introduced through Plan Change 19 (PC19). All lots are for residential activity. Lots 1-4 are proposed to be between 570m² and 720m². Lots 5 – 30 range in size between 900m² and 1880m².

The subdivision is proposed to be accessed directly from Dunstan Road, with the road vested in Council upon completion of the subdivision. The access road will contain a width of 16.9m at the entry off Dunstan Road with the access tapering to a width of 14.35m at the narrowest point. A 6.0m formed carriageway will be provided with a 3.0m shared footpath on the northern side of the carriageway. The central part of the proposed access road contains a 6.0m formed carriageway, 2.5m carparking bays on either side and a 1.5m dual footpath. The application is supported by a traffic assessment by Carriageway Consultants.

Right of way accesses are proposed throughout the subdivision to provide access to rear allotments. The applicant proposes to form these to a 3.0m width, with dual 1.5m grass berms

The subdivision is proposed to be connected to Council's reticulated water and wastewater network, with firefighting provided via hydrants on the water network. At this current point in time, Council's infrastructure for these services does not extend to the site. The proposal is made on the basis that the infrastructure will be constructed prior to the lapse date of any resultant consent. Electricity and telecommunication connections will be provided underground to each allotment. Stormwater disposal from individual allotments is proposed to be to soakpit, located within the bounds of each allotment. Stormwater from public areas is proposed to be to grass swales adjacent to the road carriageway.

Although not located on the subject site, the proposal results in the subdivision of land within 32m of the centreline of the high voltage transmission lines.

The subdivision is depicted in Figure 1 below:



Figure 1: Subdivision masterplan (Source: Application, 2025)

Land Use

Consequential land use consents are sought for breaches to District Plan performance standards pertaining to future built form on the resultant allotments for separation distances between dwellings, yard setbacks and earthworks. Land use consent is also sought for the Comprehensive Residential Development component of the proposal.

Land use consent is also sought for earthworks on contaminated land. The proposal includes a Detailed Site Investigation Report, a Remedial Action Plan and a Contaminated Land Site Management Plan.

SITE DESCRIPTION

The subject site is located at 155 Dunstan Road, Alexandra, legally described as Lot 2 Deposited Plan 581459 and Lot 2 Deposited Plan 603963 as held in record of title 1182384. The subject application will interact with a subdivision application lodged for 157 Dunstan Road, Alexandra. The application on the neighbouring property (not granted at the time of writing), seeks to create “Lot 100” which is proposed to be amalgamated into the subject site resulting in a boundary adjustment to the leg-in access portion of the subject site. The legal description of 157 Dunstan Road is Lot 2 Deposited Plan 518150, as held in record of title 811352.

Otherwise, the subject site is well described within the application and I have adopted the applicant’s description for the purposes of this record.

REASONS FOR CONSENT

Central Otago District Plan (District Plan)

The subject site is located within the Large Lot Residential Zone (LLRZ) of the District Plan. The LLRZ of the subject site is not yet able to be treated as operative pursuant to section 86F of the Resource Management Act given active appeals on the site. The Rural Residential Resource Area rules of the District Plan apply to the site.

Subdivision consent is required for the following:

- A **non-complying activity** pursuant to Rule 4.7.5(iii) for the subdivision of land which fails to comply with the 2ha average allotment size required by Rule 4.7.2 (ii)(a)(i). The average allotment size proposed is 1,377m².
- A **restricted discretionary activity** pursuant to Rule 4.7.3(i) for a breach of Rule 4.7.2(ii)(a)(ii) which requires a plan of subdivision to identify building platforms with a separation distance of 50m between dwellings.
- A **discretionary activity** pursuant to Rule 4.7.4(iii) for a breach of Rule 4.7.2(ii)(a)(iv) which requires the maximum number of allotments on a plan of subdivision accommodating residential activity to be 5 within the Rural Residential Zone.
- A **restricted discretionary activity** resource consent pursuant to Rule 12.7.8(v) which states that no subdivision shall occur within 32m of the centreline and outer edge of the support structure of a high voltage transmission line that is designed to operate at or over 110kV.

Land use consent is required for the following:

- A **discretionary activity** pursuant to Rule 4.7.4(i) for a breach of the separation distance between dwellings required by Rule 4.7.3(vii). The proposal results in the establishment of dwellings, not located on building platforms, which will be within 50m of an existing dwelling.
- A **restricted discretionary activity** pursuant to Rule 4.7.3(i) for a breach of Rule 4.7.6A(a) which requires a minimum yard setback of 10m.
- A **discretionary activity** pursuant to Rule 4.7.4(i) for a breach of Rule 4.7.6J(b) which limits earthworks on the site to an area of 2,000m² and a volume of 3,000m³.

Plan Change 19 of the Central Otago District Plan (PC19)

The subject site is located within the Large Lot Residential Zone of PC19. The Council has released the decision on submissions, meaning that PC19 has legal effect pursuant to Section 86B(1) of the Act. Council has received an appeal from the applicant in opposition to the notified decision of PC19 as it relates to the site. The appeal seeks that the site be rezoned to Low Density Residential or Large Lot Residential (Precinct 1). At the time of writing this report, the appeal has not been determined and therefore the rules of PC19 as they related to the site are not treated as operative in accordance with Section 86F of the Act.

In terms of an eventual weighting exercise, I confirm that the following rules of PC19 are applicable to the proposal:

Subdivision consent under the following:

- A **non-complying activity** pursuant to SUB-R5 where the overall density of the site does not comply with R5.1.b.

Land use consent under the following:

- A **non-complying activity** pursuant to LLRZ-R12.1.b where the density across the site is greater than 1 dwelling per 1500m²
- A **restricted discretionary activity** pursuant to LLRZ-R11 where the maximum volume of land excavated within a 12 month period exceeds 200m³ per site.
- A **restricted discretionary activity** pursuant to LLRZ-S4 where the building coverage on proposed Lots 1-4 will likely exceed 30%.
- A **restricted discretionary activity** pursuant to LLRZ-S5 for a breach to the minimum setback of 7m from a boundary with a road for proposed Lot 1.
- A **restricted discretionary activity** pursuant to LLRZ-S6 for a breach of the internal boundary setbacks for proposed Lots 1 to 4.

National Environmental Standards

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health Regulations 2011 (NESCS) came into effect on 1 January 2012. The site has been identified as having had an activity or industry undertaken on it, as described in the current edition of the Hazardous Activities and Industry List (HAIL) and is therefore subject to the NESCS. The application includes a Detailed Site Investigation (DSI) undertaken by Insight Engineering. The DSI concludes that areas of the site contain arsenic levels which exceed residential guidelines. The application is subject to resource consent under the NESCS as follows:

- A **restricted discretionary activity** pursuant to Regulation 10(2) of the NESCS.

There are no other National Environmental Standards relevant to this application.

Overall Status

Where an activity requires resource consent under more than one rule, and the effects of the activity are inextricably linked, the general principle from case law is that the different components should be bundled and the most restrictive activity classification applied to the whole proposal.

In this case, there is more than one rule involved, and the effects are linked. As such, I consider it appropriate that the bundling principle established in *Locke v Avon Motor Lodge* (1973) is applied. Having regard to the most restrictive activity classification, the application be considered, in the round, as a **non-complying activity** pursuant to sections 104 and 104B of the Resource Management Act 1991 ('RMA').

SECTION 95A NOTIFICATIONStep 1 – Mandatory public notification

Public notification has been requested. (s95A(3)(a)).

There has been no failure or refusal to provide further information or the commissioning of a report under section 92(2)(b) of the Act (s95A(3)(b)).

The application does not involve the exchange of recreation reserve land under section 15AA of the Reserves Act 1977 (s95A(3)(c)).

EFFECTS ON PERSONS

Section 95B(1) requires a decision whether there are any affected persons (under s95E). The following steps set out in this section, in the order given, are used to determine whether to give limited notification of an application for a resource consent, if the application is not publicly notified under section 95A.

Step 1: certain affected groups and affected persons must be notified

Limited notification is not required under Step 1 as the proposal does not affect customary rights groups, customary marine title groups nor is it on, adjacent to or may affect land subject to a statutory acknowledgement.

Step 2: if not required by step 1, limited notification precluded in certain circumstances

Limited notification is not precluded under Step 2 as the proposal is not subject to a rule in the District Plan or is not subject to a NES that precludes notification.

Limited notification is not precluded under Step 2 as the proposal is not exclusively for a controlled land use activity.

Step 3: if not precluded by step 2, certain other affected persons must be notified

Limited notification is not required under Step 3 as the proposal is not a boundary activity where the owner of an infringed boundary has not provided their approval, and it is not a prescribed activity.

Limited notification is not required under Step 3 as the proposal falls into the 'any other activity' category and the effects of the proposal on persons are assessed below.

PERMITTED BASELINE (s95E(2)(a))

Under Section 95E(2)(a) of the RMA, an adverse effect of the activity on persons may be disregarded if the plan permits an activity with that effect. No permitted baseline is relevant to this application given that resource consent is required for all subdivisions under the District Plan.

ASSESSMENT: EFFECTS ON PERSONS

The applicant has requested public notification of the application; however it is prudent to assess if any particular parties are adversely affected by the proposal to ensure that the application documentation is served upon them.

Lots 1-4 will have an average lot size of 652m² and will present as a distinct area of significantly higher density development on the site. This is a concept anticipated for a Comprehensive Residential Development (CRD), where higher density areas are tempered by lower density areas on the remainder of the site to achieve the overall density provisions of the LLRZ. In this instance, the density imposed by PC19 is 1 dwelling per 1,500m², with a breach of this density assessed as a non-complying activity – signalling a strong emphasis on the density provisions as a method to maintain the character and amenity of the LLRZ. The subject proposal has sought to include this area of higher density, with no obvious effort made to balance out this higher density with a lower density on the remainder of the site to achieve the overall density provisions anticipated by the plan. This higher density area is concentrated within the site, located on the south-western boundary. In terms of outward effects in this regard, the adjacent properties to Lots 1-4 are likely to experience at least minor effects from increased impacts on privacy, dominance of built form, reduction in openness around buildings, outlook and access to sunlight given the reduced separation distances between buildings, increased building coverage and reduced road frontage setbacks sought by the applicant. Overall, I consider that the proposed built form within Lots 1-4 in the absence of mitigation measures to reduce these impacts (including screening, separation and tempering by lower density on the remainder of the site) will result in built form and a density of development which is not compatible with the anticipated character of the area. Furthermore, the remainder of the site including Lots 5-30 also represents a deviation from the density at which amenity and character is provided for. In my assessment, the proposal fails to maintain the amenity and character anticipated by the provisions of PC19 and is likely to result in adverse effects which are at least minor with respect to immediately adjoining properties at 147, 149, 149B, 157 and 165 Dunstan Road, 129 Gilligans Gully Road and 36 Hillview Road in particular (with effects on both 149 and 157 Dunstan Road disregarded due to receipt of written approvals).

Step 4: Further limited notification in special circumstances

Special circumstances do not apply that require limited notification.

DECISION: EFFECTS ON PERSONS (s95B(1))

In terms of Section 95E of the RMA, the following adjacent landowners (who are not the applicant) are considered adversely affected by the proposal:

- 147 Dunstan Road
- 149B Dunstan Road
- 165 Dunstan Road
- 129 Gilligans Gully Road
- 36 Hillview Road

Given the request for public notification, I consider it appropriate to serve the application directly on these parties.

OVERALL NOTIFICATION DETERMINATION

Given the decisions made under s95A and s95B, the application is able to be processed on a publicly notified basis. It is noted that the determination, as to whether an application should be notified or not, is separate from the issues to be considered in making a decision on the application itself.

Prepared by:



Tanya Copeland
Planning Officer

Date: 30 April 2025

Approved under Delegated Authority by:



Tim Anderson
Team Leader – Planning

Date: 2 May 2025

Application for a resource consent - Form 9

APP250435280



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz



Date and Time Created 17/04/2025 01:43
Submitted to Council 17/04/2025 02:01

To cross reference Datacom with MAGIQ please click [Here](#). to add the Resource Consent number.

Property Details

Property Address 155 and 157 Dunstan Road, Alexandra
Record of Title Number 811352 and 1182384
Legal Description(s) of the specific parcels that the resource consent application is for Lot 2 DP 581459 and Lot 2 DP 603963 (155 Dunstan Road) and Lot 2 Deposited Plan 518150 (157 Dunstan Road)

What is your role in this application? Agent acting on behalf of the applicant

Agent details

An agent acts on behalf of the applicant in the submission and processing of the application.

Organisation Waveform Environmental Planning
First name Craig
Last name Barr
Phone number 0274065593
Email address craig@waveformplanning.co.nz
Note that the applicant will also receive a copy of all correspondence.
Postal address: 29 Totara Place,, Queensberry,, Cromwell 9383
Confirm that you have approval to act on behalf of the applicant Yes

The applicant is the person(s) or organisation making the application.

Applicant details

Is this applicant an individual or an organisation? Business / organisation
Organisation Glenoir LP
Contact Person
First name Shanon
Last name Garden
Phone number 64 21 414 664
Email address shanon@navigateproperty.co.nz
Postal address: 17 Millar Road, RD 5, Rotorua 3076

Authority to apply on behalf

Confirm that the applicant is authorised to apply on behalf of the organisation Yes

Invoicing

Who is paying the invoice?

Applicant

DETAILS

Activity or works proposed

Application type	Land use and subdivision consent
Short description of your proposal	Subdivision to create 30 lots for residential activity, road to vest and creation of rights of way within the Large Lot Residential Zone.

Provide a detailed description in the Assessment of Environmental Effects (AEE) or other document.

Assessment of Environmental Effects (AEE)

An application cannot be accepted for processing by the Council under Section 88 of the Resource Management Act 1991, without an Assessment of Environmental Effects (AEE).

Refer to the [guidelines for Assessment of Environmental Effects](#).

[155 Dunstan AEE.pdf](#) (2 mb)

Assessment of the activity

You may need to provide an assessment of the activity against the following provisions:

- The matters set out in [Schedule 4 of the Resource Management Act 1991](#).
- Any relevant objectives, policies, or rules in a document.
- Any relevant requirements, conditions, or permissions in any rules in a document.
- Any other relevant requirements in a document (e.g. in a national environmental standard or other regulation).

Please do not load the same document that you loaded for AEE above

Other activities

Other applications

Are you required to apply for any other resource consents for this project? Yes

Provide a brief summary of the other consents required Resource consent from the Otago Regional Council for earthworks associated with residential development.

Is this project related to a building consent? No

Pre-application information

Have you discussed this proposal with Council staff prior to this application? No prior discussion

Site visit requirements

Who is the site contact? Applicant

Affected party approvals

All affected property owners, including trustees where properties are held in a trust, must sign written approval forms AND a copy of your plans.

- If an affected party does not give approval to your proposal this may impact on the way that the application is processed.
- Council's duty planner can provide you with advice on which parties may be affected by your proposal.

[Download an affected party approval template form.](#)

Do you need affected party approval?

No

Reason

Refer to AEE. Note one property owner has provided approval, the supporting information is attached as other information.

National Environmental Standard – Contaminated Soil - option selected

I have included a Site Investigation undertaken by a suitably qualified person.

LIST OF FILES

[Attachment 3. DSI Insight Engineering.pdf](#) (9 mb)

[Attachment 4. RAP Insight Engineering.pdf](#) (234 kb)

[155 Dunstan AEE.pdf](#) (2 mb)

[Attachment 1. Scheme Plan.pdf](#) (2 mb)

[Attachment 5. Transport Assessment.pdf](#) (604 kb)

[Attachment 2. Masterplan_Studio3.pdf](#) (4 mb)

[Attachment 2. Road and Access Sections_Studio 3.pdf](#) (4 mb)

[Attachment 6. Letter to CODC T&W.pdf](#) (220 kb)

[Attachment 8. Advice from Transpower.pdf](#) (34 kb)

[Attachment 10 Rule LLRZ-S5 Road Setback.pdf](#) (305 kb)

[Attachment 9. Joe Hughes APA.pdf](#) (187 kb)

[Attachment 7. Record of Title 155 Dunstan Road.pdf](#) (282 kb)

[Attachment 7a. RT and CN 157 Dunstan Road.pdf](#) (756 kb)



Glenoir LP

155 Dunstan Road & 157 Dunstan Road

Resource Consent Application for a
Comprehensive Residential Subdivision for
30 lots for residential activity

Planning Report and AEE

April 2025



Client	Glenoir LP
Project	Comprehensive Residential Development Dunstan Road Large Lot Residential Zone
Reference	25-23
Site	155 Dunstan Road Alexandra
Completion Date	17 April 2025
Report Prepared By	Craig Barr
Credentials	BSc, MPlan, MNZPI

This Report relates solely to the specific project for which Waveform Environmental Planning Limited was engaged and the stated purpose for which the Report was prepared in accordance with the terms of agreement with the Client.

Waveform Environmental Planning Limited takes no responsibility for the use of, or reliance upon of the Report by any person or for any other means.





Contents

- 1 Description of the Proposal3**
 - 1.1 Proposal Overview3
 - 1.2 Relationship to 157 Dunstan Road and RC2500556
 - 1.3 Application Background7
 - 1.4 Plan Change 198
- 2 Description of the Proposal10**
 - 2.1 Subdivision10
 - 2.2 Bulk and Location of Lots 1-4.....10
 - 2.3 Easements12
 - 2.4 Roading.....12
 - 2.5 Future Road Connection to the South (Lot 32).....14
 - 2.6 Earthworks15
 - 2.7 Contaminated Land Management16
 - 2.8 Servicing17
- 3 Site and Surrounding Environment18**
 - 3.1 Site Description.....18
 - 3.2 Site Details.....19
- 4 Statutory Framework.....21**
 - 4.1 Central Otago District Plan21
 - 4.1.1 Large Lot Residential Zone (PC 19)21
 - 4.1.2 Operative Central Otago District Plan22
 - 4.2 Consents Required22
 - 4.2.1 Large Lot Residential Zone22
 - 4.2.2 District Wide Rules.....25
 - 4.2.3 ODP Section 4 Rural Resource Area26
 - 4.2.4 NESCS27
 - 4.3 Summary of rules the activity is compliant with28
 - 4.3.1 Access Standards from Roads.....28
 - 4.3.2 Transmission Line.....28
 - 4.4 Summary of Activity Status29
- 5 Additional Development Controls30**
- 6 Assessment of Effects32**
 - 6.1 Permitted Baseline32
 - 6.2 Affected Party Approvals and Stakeholder Engagement.....33
 - 6.3 Planning Context33
 - 6.4 Comprehensive Residential Development.....34
 - 6.5 Subdivision Design, Urban Form and Landscape35
 - 6.5.1 Summary.....49
 - 6.5.2 Subdivision Effects under the ODP Zoning49



6.6	Transport and Access.....	50
6.7	Servicing	51
6.7.1	Water and Wastewater	51
6.7.2	Power and Telecommunications	52
6.8	Contaminated Land.....	52
6.9	Earthworks	53
6.10	National Grid.....	54
6.11	Positive effects.....	54
6.12	Conclusion.....	55
7	Section 104 RMA.....	56
7.1	Actual and Potential Effects (section 104(1)(a))	56
7.2	Statutory Documents (section 104(1)(b)).....	56
7.2.1	Large Lot Residential Zone.....	56
7.2.2	ODP Section 6 Urban Areas.....	61
7.2.3	ODP Section 12 Transport (District Wide)	62
7.2.4	ODP Section 16 Subdivision	63
7.2.5	ODP Section 4 Rural Resource Area	65
7.2.6	NESCS	67
7.2.7	Operative Regional Policy Statement for Otago 2019 (ORPS)	67
7.2.8	National Policy Statements	68
7.2.9	National Policy Statement Urban Development 2020	68
7.3	Section 104(c) Other Matters.....	70
7.4	Section 104D of the RMA	70
7.5	Part 2 of the RMA.....	70

Attachments

Attachment 1:	Subdivision Plan
Attachment 2:	Studio 3 Drawings: Masterplan, Road and Access Sections and Smaller Sections
Attachment 3:	Detailed Site Investigation
Attachment 4:	Remediation Action Plan
Attachment 5:	Carriageway Consulting Transport Assessment
Attachment 6:	Todd & Walker Advice
Attachment 7:	Record of Title – 155 Dunstan Road
Attachment 7a:	Record of Title and Consent Notice – 157 Dunstan Road
Attachment 8:	Communication with Transpower
Attachment 9:	Affected Party Approval: 149 Dunstan Road / Joe Hughes
Attachment 10:	LLRZ-S5 Road Boundary Setback rule inconsistency



1 Description of the Proposal

1.1 Proposal Overview

Glenoir LP (**Applicant**) is a land development entity comprising Shanon Garden, George Collier and Shaun O’Docherty, which seeks subdivision resource consent and land use consent to subdivide the 4.1ha property at 155 Dunstan Road (**Site**) to create 30 lots for residential activity, plus rights of way and a road to vest in Council. Subdivision plans are provided in **Attachment 1** and shown in Figure 1, below.

This application is made under the decisions version of Plan Change 19 (**PC19**) to the Operative District Plan (**ODP**) Section 7 Residential, where the zoning of the Site has changed from Rural Resource Area, Rural Residential Zone (**RRZ**), to Large Lot Residential Zone (**LLRZ**).

The design of the subdivision and the allotment density is made under the Comprehensive Residential Development (**CRD**) framework introduced into the District Plan and LLRZ through PC19. The CRD framework allows for lots to be created below the 1500m² minimum lot sizes otherwise applying in the respective zone provided the threshold for minimum development area is achieved as an average across the total or gross site area¹, providing the site is at least 2ha.

The proposed subdivision design is based on a large lot suburban residential form with the proposed 30 residential lots ranging in size (net site area) from 550m² to 1820m². Lot sizes (gross, net and average) are shown below in Table 1. The proposal has an average net lot size of 1105m² including rights of way (**ROW**) and 1052m² without ROWs. The proposal has an average lot size across the Site (i.e gross site area), as per the CRD rules, of 1372m². The main road through the site, shown as Lot 31 – Road to Vest, is 7400m² with a further 615m² of future road stub linking to the neighbouring site shown as Lot 32.

¹ Plan Change 19 – Decision of the Central Otago District Council Hearings Panel, 27 June 2024. At [109].





Table One: Lot Areas and Average Size Evaluation

Lot Number	Total	Vested road	Private Access	Lot Area Ex Access
1	700		140	560
2	720		170	550
3	620		70	550
4	570			570
5	1,020			1,020
6	1,000			1,000
7	1,000			1,000
8	1,530		270	1,260
9	1,200			1,200
10	1,200			1,200
11	1,440		220	1,220
12	1,220			1,220
13	1,200			1,200
14	1,010			1,010
15	1,240		210	1,030
16	1,010			1,010
17	930			930
18	1,480		140	1,340
19	1,400		170	1,230
20	1,200			1,200
21	1,820			1,820
22	1,880		190	1,690
23	1,310			1,310
24	1,040			1,040
25	900			900
26	900			900
27	900			900
28	900			900
29	900			900
30	900			900
31	7,400	7,400		
32	615	615		
	41,155	8,015	1,580	31,560
		33,140		
	1,372	1,105		1,052

The proposed subdivision will be serviced by the Council’s network water and wastewater supply. All lots will have vehicle, cycling and pedestrian access onto Dunstan Road and the adjoining Rail Trail corridor. Power will be sourced from a supply that runs across the site (currently overhead and to be undergrounded) and telecommunications supply will be reticulated through the Site.

A number of development controls are proposed as Consent Notices to ensure subsequent built form and residential activities accord with bulk and location controls, discuss further in Section 7.5.

Figure 1 shows an excerpt of the proposed plan of subdivision. Figure 2 shows an excerpt of the urban design Master Planning work prepared by Studio 3, providing further detail on how the public areas and private accessways will be completed. The Studio 3 design work is included in full at **Attachment 2**.



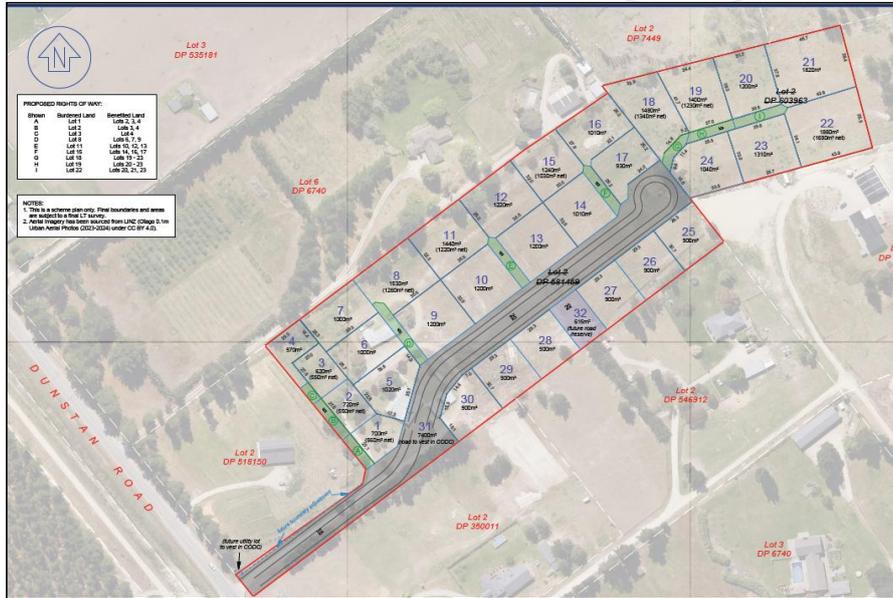


Figure 1: Excerpt of the subdivision plan in Attachment 1 (Calder Surveying).

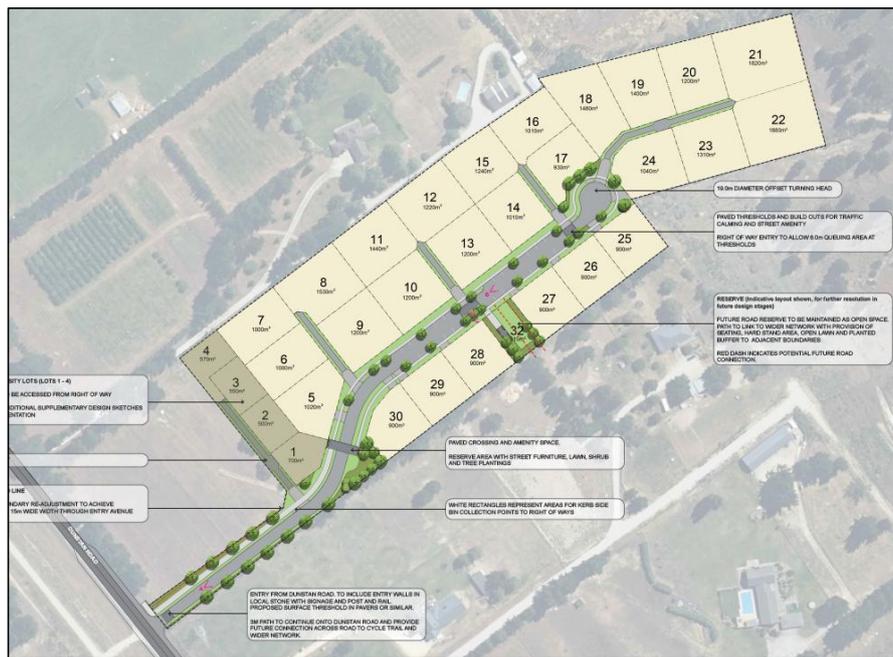


Figure 2: Excerpt of the masterplan in Attachment 2 (Studio 3).

The site has been identified as containing some small-scale areas of arsenic contamination associated with former agricultural activity and some hydrocarbon contamination from



domestic car maintenance activities. A detailed site investigation (**DSI**) has been completed and a remediation action plan (**RAP**) has also been prepared (both by Insight Engineering). The DSI and RAP are included as **Attachments 3 and 4** respectively.

The application is supported by a transport assessment prepared by Carriageway Consulting Ltd (Carriageway) included at **Attachment 5**.

1.2 Relationship to 157 Dunstan Road and RC250055

The following is referenced for context and clarity. It is not intended to directly impact on the activity.

The Applicant also owns the adjoining 1.0145ha site to the south at 157 Dunstan Road, legally described as Lot 2 DP 518150 held in RT 811352.

This neighbouring property is currently subject to a subdivision consent (RC250055) application to create five new lots for residential activity and a balance lot (Lot 100) amalgamating the Application Site, approximately 1685m² of land located within 157 Dunstan Road, and a realignment of the access leg into the Application Site. See Figure 3 and 3a, below.

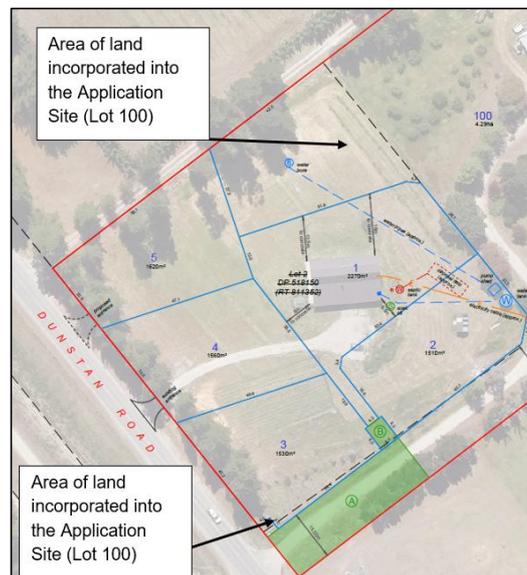


Figure 3. Excerpt of the subdivision of RC250055 identifying the land configuration of the Site. The dashed black lines represent the existing boundary location.





The outcome of the decisions on submissions to PC19 is that the site was confirmed as Large Lot Residential Zone and the decisions on submissions also introduced the CRD framework into the Large Lot Residential Zone.

The Applicants have redesigned the proposal to accord with the LLRZ CRD framework.

The Applicant has withdrawn application RC230380 and submits this application in its place.

1.4 Plan Change 19

The Site was zoned to LLRZ from Rural Residential through PC 19.

The Large Lot Residential Zone requires a minimum allotment size of 1500m², while the Comprehensive Residential Development (CRD) Rule LLRZ R-12 and corresponding subdivision rule SUB-R5 do not require a minimum allotment size for each site intended for residential activity, but rather that the 1500m² density requirement is calculated over the site being subdivided (i.e. a gross site area requirement²).

Where the CRD rule is used, Policy LLRZ-P9 is engaged which requires consideration of additional matters relating to provision of a diversity of housing types (through a variety in lot sizes) while still being designed to achieve built form outcomes in Policy LLRZ-P1, that the design responds positively to the context of the site, areas of higher density are located or designed so that the overall character of the surrounding area is retained, and the development delivers a public benefit such as public access, reserves or infrastructure improvements.

The Applicant has filed an appeal to the Environment Court³ which seeks that the site is zoned to Low Density Residential (**LDR**) with the scope of that appeal providing for an outcome between the decisions version LLRZ and LDR, for instance LLRZ Precinct 1 (1000m²) is an option available through appeal.

Neither the Applicant's appeal, nor any other appeal filed in relation to PC 19, seeks that the site be 'downzoned' or reverts to a zoning which results in lower levels of residential density than the decisions version (i.e. from LLRZ back to Rural Residential).

² As stated in Rule SUB-R5(b).

³ ENV-2024-CHC-44. URL Link [PC00019 ENV - 2024 - CHC - 000044 One Five Five Developments Ltd V CODC](#)





There are no appeals under PC19 that seek that the LLRZ residential density of 1500m² is reduced (for instance, from 1500m² to 2000m² residential density).

There are no appeals under PC19 which seek the comprehensive residential development framework is removed from the LLRZ zone or substantially altered.

One noteworthy appeal in relation to this application is the appeal of Brian De Geest⁴, who seeks that their land located in north Cromwell (near McNulty Inlet) is rezoned from LLRZ Precinct 1 to a zone which provides higher levels of density enabled by the LLRZ, or to provide for a comprehensive residential density framework for Precinct 1, and changes to LLRZ Policy 9 to provide more development enablement.

While there is an appeal on LLRZ – P9, the De Geest appeal seeks greater enablement, as opposed to restrictions on development. Therefore, Policy LLRZ-P9 can be applied to resource consent applications in its decision version form with certainty that it cannot become more restrictive.

A legal opinion from Todd & Walker Law is in **Attachment 6** which sets out the approach to the application of district plan provisions which have legal effect, but have not been made formally operative. The legal opinion is also referred to in the s104 RMA assessment of relevant objectives and policies.

In summary, while there are currently appeals on PC19 in terms of both the Site and the LLRZ provisions, the nature of the appeals are such that the residential density of the Site and the LLRZ cannot become any less intensive than the current decisions version provisions which have legal effect.

A consequence of the appeals is that some of the PC 19 provisions are not deemed operative and the ODP Rural Residential rules still have legal effect. However, their relevance is necessarily very limited and it is appropriate that weighting be given to the LLRZ rules as notified.

⁴ ENV-2024-CHC-76. URL Link [PC00019 ENV - 2024 - CHC - 076 Brian De Geest](#)





2 Description of the Proposal

2.1 Subdivision

The proposal is to undertake a subdivision to create 30 new sites for residential activity. The design of the subdivision seeks to enable some variation in Lot sizing, reflecting the inherent benefit of allowing for a variety of residential living options (typologies) within communities and avoid 'one-size-fits-all' urban form. Accordingly, Lots 1-4 will have a higher density suburban character with an average net lot size of 557m². Lots 5 through to 30 have a larger lot character and will have an average net lot size (excluding ROWs) of 1128m². Lots increase in size to the rear of the property where a gentle slope rises-up to meet the tree belt behind, offering those lots a sense of scale and views to the south across the Alexandra township. Those rear lots will be the only lots visible from any distance beyond the site.

The subdivision also includes rights of way (not included in the net area calculation), a road to vest (Lot 31) and a future road connection from Lot 31 to the adjoining property to the south (Lot 32).

2.2 Bulk and Location of Lots 1-4

As provided for in the CRD framework, allotments within a subdivision are able to be smaller than 1500m² net site area.

The design of Lots 1-4 is cued from the CRD framework and range in size from 550m² to 570m². These allotments have been tested for building feasibility from a lot configuration, space and access perspective by Studio 3. **Figure 4** below provides an excerpt from the Studio 3 urban design work detailed in **Attachment 2**. It illustrates indicative building footprint, boundary setbacks and open space within those residential Lots 1-4.

These design concepts are not intended to be adopted as part of the consented plans of the activity. However, they do inform proposed development standards. The plans show the functionality of the access/ROW configuration, open space and access to sunlight and outlook, landscaping space and the building coverage and indicative location of future development on Lots 1-4.



The plans indicate that the building setback from boundary and building coverage rules prescribed for the LLRZ are likely to be exceeded to a minor degree. To avoid the need for future resource consents by the future owners of Lots 1- 4 it is sought through this application to provide for the following development standards:

- A building coverage of 35%, which is 5% greater than provided in Rule LLRZ-S4, on a 550m² net area lot this would provide a building coverage of 192m²;
- Building setback from road boundary for Lot 1 of 4.5m, which is 2.5m closer to a road for buildings than provided for in Rule LLRZ-R5 which requires a setback of 7m⁵.
- Accessory buildings able to be located within the 3m boundary setback (for a length up to 7 metres), whereas Rule LLRZ-S6 restricts all buildings to a setback of 3m from an internal boundary.

See also Section 5-Design Controls and Section 7.5-Draft Conditions.



Figure 4. Excerpt of the Studio 3 concept plans illustrating the potential layout and future development of Lots 1-4.

⁵ The LLRZ road setback may actually be 4.5, with the CODC District Plan at the date of lodgement not having correctly reflected the decisions on submission. Refer to the planning framework.



These four smaller lots are seen by the applicant as a positive addition to the development. Smaller lot sizes promote lower cost housing as well as enabling viable rental investment opportunities.

The effects assessments below confirm that this node of houses is in keeping with the character of the surrounding neighbourhood and with the objectives and policies of the LLRZ and CRD.

2.3 Easements

No easements are shown on the site plan. The easements to be retained, cancelled or established will be identified as part of the s223 RMA certification process.

There are five rights of way/ joint owner access lots which will require new easements.

Services will be located predominantly within the road reserve, and appropriate easements in gross will be provided where services are located within any allotments.

2.4 Roading

The proposed new road to vest will have a minimum legal width of 20m within the subdivision area (i.e. at Lot 1 onwards to the north-east). However, width is limited along the leg-in off Dunstan Road. The legal width at the Dunstan Road boundary is 16.9m. This leg-in tapers slightly towards the north-east, reducing to 14.3m before it widens out to 20m adjacent to Lot 1. See **Figure 5** below.



Figure 5. Leg-in off Dunstan Rd showing legal width.



A traffic assessment has been undertaken by Carriageway Consulting Ltd (Carriageway) which is included in **Attachment 5**.

The Carriageway report supports the formation of a road to serve the subdivision, noting that the functioning of the leg-in corridor for traffic, cyclists and pedestrians and other amenity will function adequately notwithstanding that this entry section does not achieve the 20m width outlined in Council's engineering code of practice standard/roading hierarchy.

It is noted that ODP Rule 16.7.5 requires the width and construction be consistent with the requirements of Council's roading classification provided that any proposed road to be vested in the Council shall be no less than 10 metres in width. It is accepted that the Code of Practice and general practice is to identify a road with a legal width of 20m where practicable. The current 155 Dunstan Road allotment limits that width between 16.9 at the Dunstan Road intersection and 14.3m at the north-eastern extent.

It is also noted that this leg-in section is bordered to the south by 147 Dunstan Road. Traversing through this property is a National Grid Transmission line. The National Grid 'yard' or no build zone extending outward from the centre of the transmission line can be seen in **Figure 6** below. The National Grid Yard precludes future housing being developed within 147 Dunstan Road along that leg-in boundary and therefore limits or eliminates the prospect of dwellings accessing from 147 Dunstan Road to the north onto the leg-in.



Figure 6. Transpower line and no-build zone no neighbouring 147 Dunstan Rd property.





Studio 3 have worked with Carriageway to prepare an entry design and road cross-section through this leg in section of the proposed road. These designs are shown in **Attachment Two**. Notable about this cross section is that there is no parking and additional width is provided in the adjacent walking and cycling path. This will ensure vehicular traffic flows freely into and out of the site, while accommodating other modes of access.

As noted in Section 1.2 – Relation to 157 Dunstan Road and RC250055, above, the applicant proposes through that separate subdivision application to make this leg-in a consistent 15m width across its entire length by amalgamating a sliver of the 157 site back into 155 where the current legal width is less than 15m, and a sliver from 155 to 157 where the current width exceeds 15m, allowing that adjusted area to vest as road.

The Carriageway report assesses the current transport networks and patterns, and assesses the proposed traffic generation, distribution and the adverse effects on the transport network.

Carriageway identify that the proposed access onto Dunstan Road will be a priority tee-intersection, with localised widening of Dunstan Road around the intersection required to facilitate through-traffic on Dunstan Road.

Carriageway have also provided an assessment of the need for connection across Dunstan Road for walking and cycling access to the Rail Trail corridor. Carriageway note that this pedestrian crossing will need to be considered in the context of the extent of residential activity now enabled along Dunstan Road by the LLRZ zoning.

The Carriageway report establishes that the proposal is appropriate in terms of not only traffic generation effects onto Dunstan Road and the wider transport network, but also local performance standards in terms of sight distance from the new intersection onto Dunstan Road and safety and operation aspects thereof.

2.5 Future Road Connection to the South (Lot 32)

A future road connection is proposed from within the Site into 149 Dunstan Road.

This future connection, running to the south-east off the new vested road in 155 Dunstan Road, will enable internal connection between adjacent properties re-zoned under PC 19. This rear access is desirable both to effectively utilise the small lifestyle land parcels that





have been re-zoned and also to limit the number and effect of multiple future intersections joining those separate parcels onto Dunstan Rd.

The applicant sees the volunteering of this future road stub as an important enabler of connectivity within this portion of the LLRZ zone, and accordingly of considerable public benefit. It is the applicant’s expectation that Council will promote rear access across neighbouring sites as they are developed in the future. Without the applicant taking this initiative, and volunteering land for future roading connection, such integration would not be possible. These types of connections would not be considered reasonable or expected to be provided under a typical LLRZ subdivision where the CRD framework is not deployed.

The roading connection is supported by the owner of 149 Dunstan Road, as evidenced by their Affected Party Approval, included as **Attachment 10**.

An illustration of how this future roading alignment would likely work, serving all three adjacent LLRZ-zoned properties, is shown in **Figure 7** below.



Figure 7. Plan illustrating how the future roading connection (Lot 32) may be extended through adjacent LLRZ properties.

2.6 Earthworks

The site is predominantly flat with a gentle uphill slope at the rear (north-eastern) end of the site. The proposed scheme does not require modification to the landform.





Consequently, earthworks proposed as part of this application will be limited to tidying the site for intended urban residential development, associated ground disturbance with the removal of buildings and associated structures, formation of the road and access lots, and trenching of services.

In terms of relevant rules, the earthworks would not result in a cut or fill of 1 m within 2m of a site boundary. However, it will exceed the permitted limit of 200m³ on any site within a 12-month period as set out in Rule LLRZ-R11.

It is likely that the earthworks would exceed 2,500m² and, as discussed in Section 2.7 below, the site contains small amounts of contaminated land.

A resource consent for earthworks associated with residential activity will be required pursuant to Otago Regional Plan: Water, Rule 14.5.1. This resource consent manages erosion and sediment related aspects and would be applied for an obtained following the outcome of the subdivision consent.

2.7 Contaminated Land Management

Being a subdivision, the proposal engages the NESCS.

Insight Engineering have undertaken a Detailed Site Investigation (**DSI**). Testing of soil samples over the site has identified that the Site contains four small areas containing arsenic exceeding residential land use guidelines. These areas of contamination are assessed to be, associated with former agricultural land uses. These areas will be remediated as part of the subdivision development works by removal of the affected area to an approved landfill. The DSI is in **Attachment 3**.

Figure 8 below identifies the areas of the site where soil will be remediated.





Figure 8. Excerpt of the Insight Engineering site plan, red squares identify the areas to be remediated.

The conclusions of the Insight Engineering DSI are that the activity can be supported providing conditions of consent are included requiring suitable remediation through the subdivision development.

A Remediation Action Plan and Contaminated Site Management plan has also been completed and this is provided in **Attachment 4**.

2.8 Servicing

Servicing of water and wastewater will be via the Council’s reticulated network. Power and telecommunication and internet media will be via network utility providers.

It is understood that Council are in the process of extending their reticulated water and wastewater networks along Dunstan Road to serve the PC 19 LLRZ rezoning. The Applicant is aware that this work has been provisioned in the Council’s capital works budget for 2024/25 and 2025/26 and this intended to be delivered within the 2026 financial year.

Therefore, the necessary service connections are able to made within the standard lapse date of a resource consent.



3 Site and Surrounding Environment

3.1 Site Description

The site is flat over the 3ha western portion (Lot 2 DP 581459) and the remaining 1ha approximate area (Lot 2 DP 603963) gently rises towards the treed hill slope at the north-eastern boundary of the Site.

The Site is presently characterised by the established rural lifestyle development along the north-eastern side of Dunstan Road. Behind and further to the east land is designated reserve (town belt). Further south-east, back along Dunstan Road towards the centre of town, land has been developed for service / yard uses (113, 119 and & 127 Dunstan Road), with underlying rural zoning and existing use rights for various commercial uses, including the Fulton Hogan offices and yard.

The area extending along Dunstan Road to the north-west, away from town, is characterised by small paddocks and rural lifestyle dwellings with associated sheds and amenity plantings. There are lineal exotic shelterbelts (typically pine) and the landscape scale is small in a rural context. However, this rural character can be said to be in transition to urban character as a direct result of the PC19 re-zoning.

Land on the opposite, south-western, side of Dunstan Road is zoned urban. Land directly opposite the site is zoned MDR (**MDR**) and has a minimum lot size of 200m².

The Alexandra golf course is approximately 250m along Dunstan Rd to the north-west, and is designated.

Dunstan Road has a 30m legal width. The Otago Central Rail Trail corridor runs adjacent to this on the south side of the road. The Rail Trail corridor forms an important cycling and walking link to nearby services and amenities, including Dunstan High School, the Terrace Primary School, and Molyneux Park. It will be important to take these forms of movement into account when providing for access and connectedness to the site.

The roading environment is described in detail in the Carriageway report contained in **Attachment 5**.



The National Grid is located adjacent to the southern corner of the site near Dunstan Road. Correspondence was initiated with Transpower via their Patai Developer Portal. Transpower have responded that they have no concerns with the proposed development with their advice in **Attachment 8**.

3.2 Site Details

The Site is legally described as Lot 2 DP 581459 and Lot 2 DP 603963, held together in Record of Title (**RT**) 1182384, and comprising an area of 4.132ha as shown in Figure Nine below.

The Site is owned by the Applicant.

The record of title is included as **Attachment 7**.



Figure 9. Site Plan showing two lots comprised in RT 1182384.

There are no consent notices registered on this RT.

As noted above, the adjoining site to the south-west at 157 Dunstan Road is also owned by the Applicant, and the record of title is in **Attachment 7a**. 157 Dunstan Road has a subdivision proposal with Council (RC250055) which would result in a small boundary adjustment to the leg-in access, and also involves an additional 1643m² land area being incorporated into the Application site, as shown in Figure 3 and 4, and Table Two, above.





At the time of making this application, that consent had been lodged (Council reference RC250055) but has not been granted. For avoidance of doubt and to prevent issues of scope arising, those parts of the site which will become part of the Application (i.e. Lot 100 as shown on RC250055) site are included as part of the Application, and for the avoidance of doubt all land comprising 155 Dunstan Road and 157 Dunstan Road are identified on the Application form. The RT and consent notice are in **Attachment 7a**.



4 Statutory Framework

4.1 Central Otago District Plan

The residential sections of the District Plan have been recently reviewed through PC19, and as discussed above, the Site is zoned LLRZ.

The LLRZ zoning is not yet able to be treated as operative pursuant to section 86F of the RMA because appeals to the Environment Court have been lodged and these have not yet been determined or withdrawn. Therefore, the Rural Residential Zone rules still apply to the Site.

Notwithstanding this, beyond those Rural Residential rules still having legal effect, the relevance of the Rural Residential Zone, rules and objectives and policies to this Site and this activity are very limited and, although the Rural Residential Zone rules need to be applied for technical reasons, they are of limited relevance in a decision-making context.

4.1.1 Large Lot Residential Zone (PC 19)

The LLRZ provides for residential activity at a density of one residential lot per 1500m² 'net site area', with the ability for a residential density of one residential lot per 1500m² 'gross site area' as a restricted discretionary activity through CRD Rule LLRZ-R12.

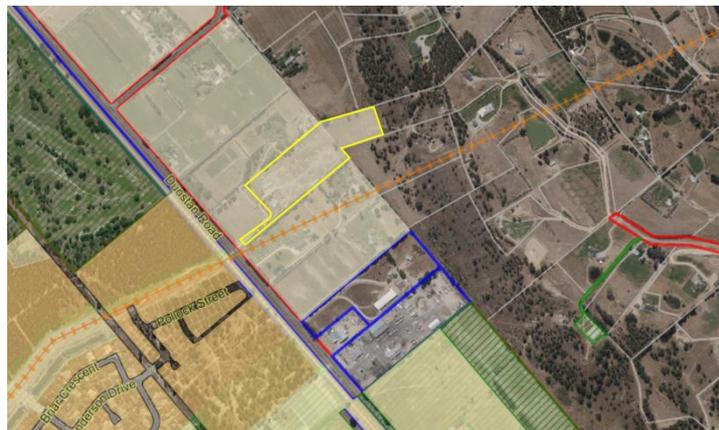


Figure 10. CODC District Plan Web Map. PC 19 overlay showing the 155 Dunstan Road portion of the site outlined in yellow.



4.1.2 Operative Central Otago District Plan

The Site is Rural Residential zone under the ODP which anticipates residential activity at a density of one residential unit/lot per 2ha.

4.2 Consents Required

Resource consent is required for the following:

4.2.1 Large Lot Residential Zone

- Rule LLRZ-R11 permits earthworks within any 12-month period to 200m³ (excluding where this is required for construction of a building for which building consent has been issued). The subdivision development will result in greater than 200m³. A restricted discretionary activity resource consent is required with discretion restricted to:
 - a. The location, volume and area of excavation.
 - b. The effect on amenity values or safety of neighbouring sites.
 - c. The effect on water bodies and their margins.
 - d. The impact on visual amenity and landscape character.
 - e. Any effects on the road network arising from the excavation.
 - f. Any effects on archaeological, heritage or cultural values.
 - g. Any mitigation measures proposed.
- Rule LLRZ-R12 Comprehensive Residential Development provides as a restricted discretionary activity, a density of residential development across the site no greater than 1 dwelling per 1500m². Where compliance is not achieved the activity is non-complying.

The proposal seeks resource consent to establish residential activity through Rule LLRZ-R12. The density across the site will be 1 dwelling per 1,377m² which exceeds the 1500m² per dwelling requirement to qualify as a restricted discretionary activity.

Although the activity is non-complying, the matters of discretion are considered relevant and are:

- a. Provision for housing diversity and choice.
- b. How the development responds to the context, features and characteristics of the site.



- 
- c. The extent to which the proposal provides wider community benefits, such as through protection or restoration of important features or areas, increased opportunities for connectivity or community facilities.
 - d. Measures proposed to ensure higher density areas do not detract from the character and amenity of the wider surrounding area.
 - e. Integration with transport networks, including walking and cycling.
 - f. The location, extent and quality of public areas and streetscapes, taking into account servicing and maintenance requirements.
 - g. How the configuration of lots will allow for development that can readily achieve the outcomes sought in LLRZ-P1.
 - h. Where the application also seeks provision for future built development to breach any of the standards, discretion is also restricted to those matters specified in the relevant standard.
- Rule LLRZ-S4 permits the building coverage of any site up to 30%. A building coverage of 35% is sought on Lots 1 to 4.

Non-compliance requires a restricted discretionary activity consent with matters of discretion restricted to:

- a. Compatibility of the built form with the existing or anticipated character of the area.
 - b. Dominance of built form in the surrounding area.
 - c. The extent to which a level of openness around and between buildings is retained.
 - d. Any mitigation measures proposed which reduce the adverse effects of the breach.
- Rule LLRZ-S5 requires a minimum setback of 7m from a boundary with a road. A road boundary setback of 4.5m is sought for Lot 1 in relation to the future road.

Non-compliance requires a restricted discretionary activity consent with matters of discretion restricted to:

- a. Any adverse effects on the safety and efficiency of the road network.
- b. The extent to which the breach will have adverse effects on visual amenity values, including dominance.
- c. Compatibility of the building or structure with the surrounding built environment.

It is noted that that PC 19 Hearings Panel's recommendation on submissions shows that this rule is amended from a 7.5m setback, to a 4.5m setback⁶, and an additional matter of discretion included (d) 'Any constraints which make compliance impractical'. However, the District Plan does not appear to

⁶ Plan Change 19 – Decision of the Central Otago District Council Hearings Panel. Page Dated 27 June 2024. Appendix One – PC 19 Provisions as Amended by Decisions (Page 15) [URL Link](#)





accurately reflect this rule. As a precaution, the above has been identified as a non-compliance and consent requirement. Refer to **Attachment 10**.

- Rule LLRZ-S6 requires that any building or structure shall be setback a minimum of 3m from any internal boundary. For allotments 1 to 4 it is sought to enable accessory buildings (as defined in the District Plan up to 7m length within the boundary setback (except a boundary with a ROW). Non-compliance requires a restricted discretionary activity consent with matters of discretion restricted to:
 - a. Adverse effects on privacy, outlook, or shading on the affected property.
 - b. The extent to which the breach will have adverse effects on visual amenity values, including dominance.
 - c. The compatibility of the building or structure with the surrounding built environment.
 - d. Any adverse effects on accessibility to the lake

- Rule SUB-R5 requires a restricted discretionary activity resource consent for subdivision of land where a land use consent has been obtained, or is applied for concurrently under Rule LLRZ-R12, where the density across the site is no greater than 1 dwelling 1500m². Discretion is restricted to the following:
 - a. Whether the subdivision creates [allotments](#) that can accommodate anticipated land uses and are consistent with the purpose, character, and qualities of the applicable zone.
 - b. The provision of adequate [network utility](#) services (given the intended use of the subdivision) including the location, design and construction of these services.
 - c. The ability to lawfully dispose of wastewater and stormwater.
 - d. The location, design and construction of access to public [roads](#) and its adequacy for the intended use of the subdivision.
 - e. The provision of [landscaping](#), including [road](#) berms.
 - f. [Earthworks](#) necessary to prepare the [site](#) for [development](#) occupation, and/or use.
 - g. Subdivisional design including the shape and arrangement of [allotments](#) to:
 - i. facilitate convenient, safe, efficient and easy access.
 - ii. achieve energy efficiency, including access to passive solar energy sources.
 - iii. facilitate the safe and efficient operation and the economic provision of roading and [network utility](#) services to secure an appropriate and co-ordinated ultimate pattern of [development](#).
 - iv. maintain and enhance amenity values.
 - v. facilitate adequate access to back land.
 - vi. protect existing [water races](#).



- h. The provision of or contribution to the [open space](#) and recreational needs of the community.
- i. The provision of buffer zones adjacent to [roads](#), [network utilities](#) or natural features.
- j. The protection of important landscape features, including significant rock outcrops and escarpments.
- k. Provision for pedestrian and cyclist movement, including the provision of, or connection to, walkways and cycleways.
- l. The provision of [esplanade strips or reserves](#) and/or [access strips](#).
- m. Any financial contributions necessary for the purposes set out in Section 15 of this Plan.
- n. Any measures required to address the potential for reverse sensitivity effects to arise in relation to existing activities undertaken on adjoining land.
- o. Consistency with any Structure Plan included in this District Plan

4.2.2 District Wide Rules

- Rule 12.7.8(v) states that no subdivision shall occur within 32 metres from the centreline and 32 metres from the outer edge of the support structure of a high voltage transmission line that is part of the transmission network and is designed to operate at or over 110kV. Although no buildings will be located within 32m from the centreline, the boundary of the site is within this distance (as measured on Council's GIS and shown below). The proposed access road part of the site is within the 32m setback.



Figure 5. Excerpt of the CODC District Plan Web Map showing the location of the site boundary and the centreline of the National Grid. The image identifies that no buildings or boundaries for residential lots will be located within the 32m setback.

As noted in Section 3.1 – Site Description, communication has been made with Transpower and Transpower has confirmed it has no concerns regarding the proposed development.

See **Attachment 8**.



A resource consent is required for a restricted discretionary activity with discretion restricted to the following matters.

1. *The extent to which the subdivision design avoids, remedies or mitigates conflicts with the transmission line, for example through the location and design of [roads](#), reserves and [landscaping](#);*
2. *Capability of the [allotment](#) to accommodate a [building](#) platform which complies with Rules [12.7.8.i](#), [ii](#) and [iii](#) and [earthworks](#) that comply with [Rule 12.7.8.iv](#).*
3. *The ability to maintain and inspect the transmission line, including ensuring access;*
4. *The extent to which the design and development of the subdivision will minimise the risk of injury and/or property damage from the transmission line;*
5. *Compliance with NZECP 34:2001, and*
6. *The outcome of any consultation with the transmission line owner.*

4.2.3 ODP Section 4 Rural Resource Area

The following rules of the Rural Resource Area have legal effect.

- Rule 4.7.2 (ii)(a) (i) requires an average allotment size of no more than 2ha, and allotments in excess of 4ha are deemed to be 4ha for averaging purpose. A non-complying activity resource consent is required pursuant to Rule 4.7.5 (iii)

The following rules of the Rural Resource – Rural Residential Area apply to the Site and will not be met because the subdivision will develop residential activity consistent with the large lot residential (LLRZ) zoning.

- Rule 4.7.2 (ii) requires a separation of dwellings of 50m and this standard will not be met on any lot. A restricted discretionary activity is required pursuant to Rule 4.7.3(i).
- Rule 4.7.2 (iv) limits the maximum number of allotments identified on a plan of subdivision is limited to 5. The proposal seeks 30 lots. A discretionary activity consent is required pursuant to Rule 4.7.4(iii)
- Rule 4.7.6.A.(a) Bulk and Location Requirements – Yards, requires a minimum side and rear yard of 10m. A restricted discretionary activity is required pursuant to Rule 4.7.3(i).



- Rule 4.7.6.J(b) Restricts earthworks to 2000m² and 3000m³. The activity will comprise greater than 2000m², because the majority of the site will be developed for urban residential activity. This involves road formation, trenching and stormwater areas. The lots are not proposed to be benched and will be retained in the same landform as present. A discretionary activity consent is required pursuant to Rule 4.7.4.i.

4.2.4 NESCS

A DSI has been undertaken by Insight Engineering (**Attachment 3**), and as discussed above, small areas have been identified through soil testing as containing arsenic levels which exceed residential guidelines.

Regulation 10 is the applicable provision of the NESCS to the activity and states:

- (2) *The activity is a restricted discretionary activity while the following requirements are met:*
- (a) *a detailed site investigation of the piece of land must exist:*
 - (b) *the report on the detailed site investigation must state that the soil contamination exceeds the applicable standard in [regulation 7](#):*
 - (c) *the consent authority must have the report:*
 - (d) *conditions arising from the application of subclause (3), if there are any, must be complied with*

The activity meets all of the above and therefore, a restricted discretionary activity resource consent is required under the NESCS. The matters of discretion are:

- (3) *The matters over which discretion is restricted are as follows:*
- (a) *the adequacy of the detailed site investigation, including—*
 - (i) *site sampling:*
 - (ii) *laboratory analysis:*
 - (iii) *risk assessment:*
 - (b) *the suitability of the piece of land for the proposed activity, given the amount and kind of soil contamination:*
 - (c) *the approach to the remediation or ongoing management of the piece of land, including—*
 - (i) *the remediation or management methods to address the risk posed by the contaminants to human health:*
 - (ii) *the timing of the remediation:*
 - (iii) *the standard of the remediation on completion:*
 - (iv) *the mitigation methods to address the risk posed by the contaminants to human health:*
 - (v) *the mitigation measures for the piece of land, including the frequency and location of monitoring of specified contaminants:*



- 
- (d) the adequacy of the site management plan or the site validation report or both, as applicable:*
 - (e) the transport, disposal, and tracking of soil and other materials taken away in the course of the activity:*
 - (f) the requirement for and conditions of a financial bond:*
 - (g) the timing and nature of the review of the conditions in the resource consent:*
 - (h) the duration of the resource consent.*

4.3 Summary of rules the activity is compliant with

While not an exhaustive list of the rules the proposal complies with, the following rules have been identified as relevant in the context of this application.

4.3.1 Access Standards from Roads

ODP Rule 12.7.1 contains several performance standards which relate to vehicle access from roads. As identified in the Carriageway report the activity will comply with sight distances onto Dunstan Road and each lot can comply with local road requirements (Rule 12.7.1(ii)), access to arterial roads and local roads (Rule 12.7.1(iii) and (v)), parking (Rule 12.7.2), loading and manoeuvring (Rule 12.7.3).

4.3.2 Transmission Line

ODP Subdivision Rule 16.7.11 High Voltage Transmission Lines – requires that where subdivision activities are to occur in close proximity to high voltage transmission lines (being 20 metres either side of the centre line of that transmission line) such subdivisions shall, through the design of sites and the location of roads and reserves under the route of the line:

- (a) Ensure that ease of access to transmission lines is maintained so that maintenance and inspections of transmission lines to avoid risk of injury and/or property damage can occur;
- (b) Be designed so that there will be no need to erect buildings within 20 metres of the centre line on each of high voltage transmission lines; and
- (c) Facilitate building platforms for residential dwellings where the main living area will not face the transmission lines.





4.4 Summary of Activity Status

Overall, resource consent is required for a **non-complying activity**.



5 Additional Development Controls

Appropriate conditions relating to implementing the subdivision, service connections, earthworks and management of contaminated land are anticipated to be able to be implemented through typical conditions of consent.

The following conditions are volunteered in relation to the bespoke bulk and location arrangements proposed for Lots 1-4:

1. Buildings shall be setback a minimum of 3.0 meters from an internal boundary, except an accessory building can be located within an internal boundary (but not a Right of Way boundary) setback for a length of up to 7.0 metres.
2. Buildings shall be set back a minimum of 4.5m from a road boundary⁷.
3. Building coverage shall be not greater than 35%.
4. An outdoor area shall be located on the western through to northern side of the dwelling with minimum dimensions of 5.0 metres and area of 50m².

The following condition is volunteered over Lots 1-4 and Lots 19-23:

5. That buildings shall be limited in height to 6m.

The following condition is volunteered in relation to all buildings on all Lots 1-30 within the site

6. That any minor or secondary dwelling on any lot on a lot comprising a net area of 1000m² or less be attached to, or located within 5 metres of the primary dwelling.

The rationale for condition 6 is to ensure the efficient use of land, promoting the retention of open space on smaller lots, consistent with stated objectives in LLRZ zone.

With regard to proposed condition 1, an accessory building is defined in the District Plan as:

in relation to any site within an urban area (but excluding any residential zone) means an ancillary detached building or structure (and includes a carport or garage and excludes a wall [other than a retaining wall] or fence of a height not exceeding 2 metres above the supporting ground) if:

⁷If required pending any outcome of the status of Rule LLRZ-S5.





- a. *The use of the accessory building is clearly incidental to the existing or future use of the land, and*
- b. *The accessory building is located on the same site as the principal building.*

An accessory building includes a freestanding garage or carport, but not a garage or carport which is structurally part of or attached to the principal building on a site.

In relation to any site within a residential zone, means a detached building, the use of which is ancillary to the use of any building, buildings or activity that is or could be lawfully established on the same site, but does not include any minor residential unit.



6 Assessment of Effects

In accordance with Section 88 and Schedule 4 of the RMA an assessment of any actual or potential effects on the environment that may arise from the proposal is required with any details of how any adverse effects may be avoided, remedied or mitigated. Accordingly, the below is an assessment of effects relative to the scale and significance of the proposed activity.

The assessment provided below focuses on the actual and potential effects arising from the development, as set out under the following headings:

- Permitted Baseline
- Planning Context
- Comprehensive Residential Development Framework
- Subdivision Design, Urban Form and Landscape
- Transport and Access
- Servicing
- Contaminated Land
- Earthworks
- Positive Effects
- Conclusion

The Comprehensive Residential Development matters of discretion are relevant to the activity and have been incorporated into the following AEE.

6.1 Permitted Baseline

The LLRZ rules (SUB-R5) requires that all subdivision activity requires a resource consent, and Rule LLRZ-R12 requires a restricted discretionary activity resource consent for CRD. Accordingly, there is no permitted baseline to be applied in this case.



6.2 Affected Party Approvals and Stakeholder Engagement

An Affected Party Approval (on CODC Form 8A) (APA) is provided by the owners of 149 Dunstan Road, being the neighbouring property on the south-eastern site that the future road stub abuts. See **Attachment 9**. That landowner supports both the proposed development scheme as well as the provision of a future road stub that connects to and would ultimately extend into their property.

Transpower have confirmed they have no issues with the proposal in relation to the National Grid. A copy of consultation with Transpower is in **Attachment 8**.

The applicant is in periodic communication with other neighbours and has shared information about their proposed development. While no further APAs have been provided, the applicant has not encountered, nor are they aware of, any specific opposition to the application.

6.3 Planning Context

While there is no permitted baseline, the preceding sections of this Planning Assessment have described the following significant aspects of the applicable planning framework which must be taken into account when forming an opinion of the adverse effects of the activity:

- The Site is zoned LLRZ. While there is a appeal over the site, regardless of the outcome of the appeal, the zoning cannot become any less intensive than the current decisions version LLRZ framework; and
- The anticipated residential density of the Site is 1500m² net area or 1500m² gross site area provided by the CRD rule framework, subject to obtaining resource consent. The activity seeks consent under CRD Rules LLRZ-R12 and SUB-R5, with the gross site area exceeding 1500m² and rendering the activity non-complying;
- The Rural Residential zoning is not considered relevant in forming an opinion of the adverse effects of the proposal.



6.4 Comprehensive Residential Development

The CRD planning framework is a new concept to the District Plan. The relevant guidance is provided in the matters of discretion in Rules LLRZ-R12, with Policy LLRZ-P9 forming the key decision-making criteria.

The relevant policy considerations and matters of discretion for the LLRZ are considered below:

Policy LLRZ-P9

Provide for a higher density of development on larger sites, where development is undertaken in a comprehensive manner and:

- 1. the overall layout provides for a variety of lot sizes and opportunities for a diversity of housing types while still being designed to achieve the built form outcomes in LLRZ-P1;*
- 2. the design responds positively to the specific context, features and characteristics of the site;*
- 3. areas of higher density development are located or designed so that the overall character of the surrounding area is retained; and*
- 4. the development delivers a public benefit, such as public access, reserves or infrastructure improvements.*

To provide the discretion to assess these, the matters of discretion in Rule LLRZ-R12 are:

- a. Provision for housing diversity and choice.*
- b. How the development responds to the context, features and characteristics of the site.*
- c. The extent to which the proposal provides wider community benefits, such as through protection or restoration of important features or areas, increased opportunities for connectivity or community facilities.*
- d. Measures proposed to ensure higher density areas do not detract from the character and amenity of the wider surrounding area.*
- e. Integration with transport networks, including walking and cycling.*
- f. The location, extent and quality of public areas and streetscapes, taking into account servicing and maintenance requirements.*



- g. How the configuration of lots will allow for development that can readily achieve the outcomes sought in LLRZ-P1.
- h. Where the application also seeks provision for future built development to breach any of the standards, discretion is also restricted to those matters specified in the relevant standard.

6.5 Subdivision Design, Urban Form and Landscape

The following assessment is guided by the matters of discretion of Rule LLRZ-R12.

a. Provision for housing diversity and choice.

The proposed subdivision has provided a variety of allotment sizes, broadly grouped into the following four types (net site area):

- Group 1: Western area - Lots 1-4 (550m² to 570m²);
- Group 2: Northern side of road – Lots 5-17 (930m² to 1260m²);
- Group 3: Eastern (or rear) area – Lots 18-24 (1040m² - 1820m²); and
- Group 4: Southern side of the road – Lots 25 to 30 (all lots are 900m²)

The permitted building coverage of 30% on a typical LLRZ lot with a net area of 1500m² is 450m².

Lots in the four groupings will have building coverage as shown in **Table Four** below:

Grouping	Lots	Lot Size		Building coverage @ 30%		
		From	To	From	To	Prescribed Limitation
Eastern	Lots 1-4	550	570	165	171	Proposed up to 190m ²
Northern	Lots 5-17	930	1260	279	378	
Eastern	Lots 18-24	1040	1820	312	546	
Southern	Lots 25-30	900	900	270	270	

Table Four: Building coverage range by lot grouping

Lots 1-4 are proposed to have a modified maximum building coverage up to 190m², making this up to 35% of the smallest (550m²) lot in that grouping. This is supported by the urban design concept work prepared by Studio 3 and as described in **Attachment Two**.





The variety of lot sizes, while still characterised as large lot residential, will provide for a variety of housing options and choices, with the resultant building coverage on each lot also providing a diversity ranging in size from 190m² to 546m². This appropriately provides for a diversity of housing typologies, designs and, consequently, price points and forms of ownership.

In terms of adverse effects, while there are more lots than that anticipated, the built form over the Site will be similar as what would be the case with a complying LLRZ subdivision in which all lots achieved a net area (or gross site area) of 1500m². This is because the building coverage over the zone is expressed as a ratio rather than through a maximum building size for each lot.

b. How the development responds to the context, features and characteristics of the site.

The following evaluation also addresses matter of discretion (d) *Measures proposed to ensure higher density areas do not detract from the character and amenity of the wider surrounding area.*

The proposed development has provided a considered response to the overall site context, features and characteristics, specifically in relation to roading public space and accessibility, lot arrangement and groupings and access to space for recreation.

Roading

The Carriageway report considers the functionality of the proposed roading configuration in terms of the relevant Council's subdivision and development standards, which has helped ensure that access and connectivity is feasible in terms of NZS 4404 and matters that will be addressed during the more detailed subdivision design.

The Studio 3 Urban Planning evaluation has further informed layout and design, as described below.

The Masterplan also shows inductive street planting, a landscaping local amenity area (i.e. functions as a local reserve) within the road to the south of Lot 30, which would be developed to provide street furniture, lawn, tree and shrub plantings. The road environment also shows paved crossing areas.



There is room for landscaping and amenity features in the wider road reserve area outside of the formed road and footpath, as shown in the Masterplan in **Attachment 2**.

A key characteristic of the site, which has informed design, is that it is a rear-lot, separated from the adjoining road by the 157 Dunstan Road property in-front, and being accessed via a leg-in road on the south side.

The leg-in entrance will take the form of a tree-lined avenue, with no parking, and placing high priority on walking and cycling access. See **Figure 11** below. This configuration references a rural road typology and will therefore contribute to a sense of openness consistent with the objectives and policies set out for the LLRZ zone.



Figure 11. Studio 3 Leg-in vested road design

It is noted that the National Grid corridor on the south-east side of the road will function to prohibit building on that side of the leg in, and will therefore further contribute to the sense of open space at the entrance to the Site.

The internal portion of the vested road has an integrated design that marries the requirements of traffic movement, parking, open space, servicing and lot access. This is illustrated excerpts from the Studio 3 Design Concept at **Figures 12 and 13** below.



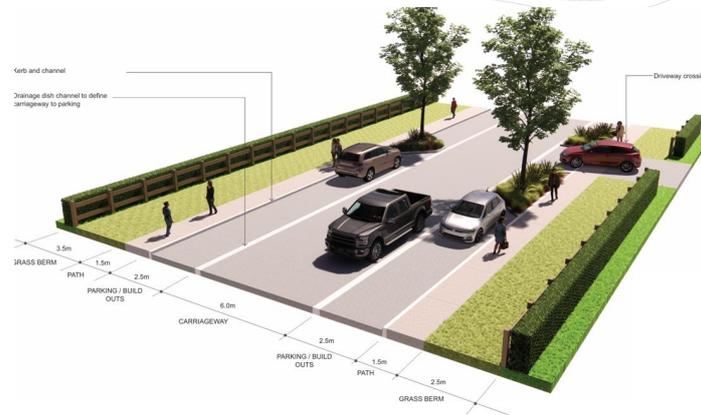


Figure 12. Studio 3 Internal vested road design



Figure 13. Studio 3 Joint Owned Access Lot entrance design

Provision for landscaping has been made within this vested road corridor, as shown in the Site Masterplan in **Attachment 2**.

At the end of the leg-in portion of the road, adjacent to lots 1, 5 and 30, the road will kink before straightening through the remainder of the Site. This kink (illustrated in Figure 14 below). incorporates open space and provides the opportunity for landscaping that can deliver a range of benefits:

- The view up the leg-in from Dunstan Road will be of open space and linear plantings, terminating at a single dwelling (Lot 30) behind. This can be contrasted with looking up a long suburban street with dwellings on each side, stretching to the back of the site.



- Looking from within the site towards Dunstan Road, the kink will confer a sense of enclosure (safety, privacy, smaller scale) and may foster a sense of community that can be difficult to achieve on long straight avenues.
- The kink and landscaped open space beside will function as a transition from the planted avenue along the leg-in, shown in figure 11, into the more conventional urban streetscape within the site, shown in Figure 12. There is the opportunity for hard landscaping on the grassed space to the south-east side, such as seating, tables, or even public art.
- The kink can (subject to the dictates of Council's engineering standards) play a role in traffic calming. The addition of a road surface change at the marked pedestrian and cycle crossing shown in Figure 14 may form a component of this.



Figure 14. Studio 3 Excerpt from Master Plan highlighting open space at Kink in vested road

Within the site, the Lot 32 future road stub provides further opportunity for open space. As shown in the excerpt from the Studio 3 concept design at Figure 15 below, offsetting the carriageway within that 20m corridor would create open space on one side. In the near term, ahead of neighbouring development and construction of a connecting road, this area will remain as open space and be available for recreation by residents of the applicant's development.

An opportunity exists to incorporate landscaping and recreation features into that land area in the near term that, if sited with a future road in mind, could be retained permanently.



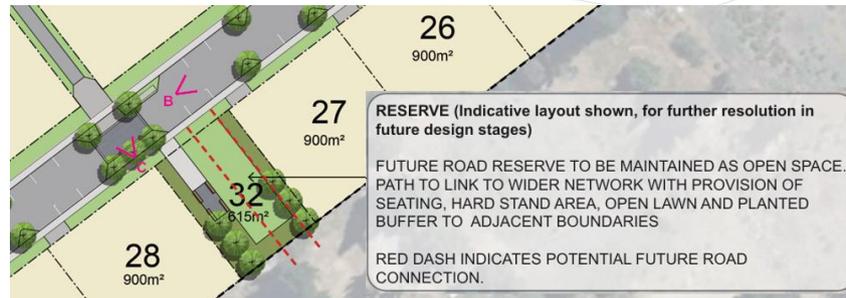


Figure 15. Studio 3 Excerpt from Master Plan illustrating open space within the Lot 32 road stub

Lot Arrangement and Grouping

The arrangement and grouping of lots of differing sizes has been carefully considered in the context of the site, and as informed by the objective and policies of the LLRZ zone. This consideration incorporates both how the scheme arrangement and built form will be experienced from within, as well as how it will be perceived from beyond the Site. **Figure 16** below illustrates the groupings and provides an overview of the logic applied to their arrangement.

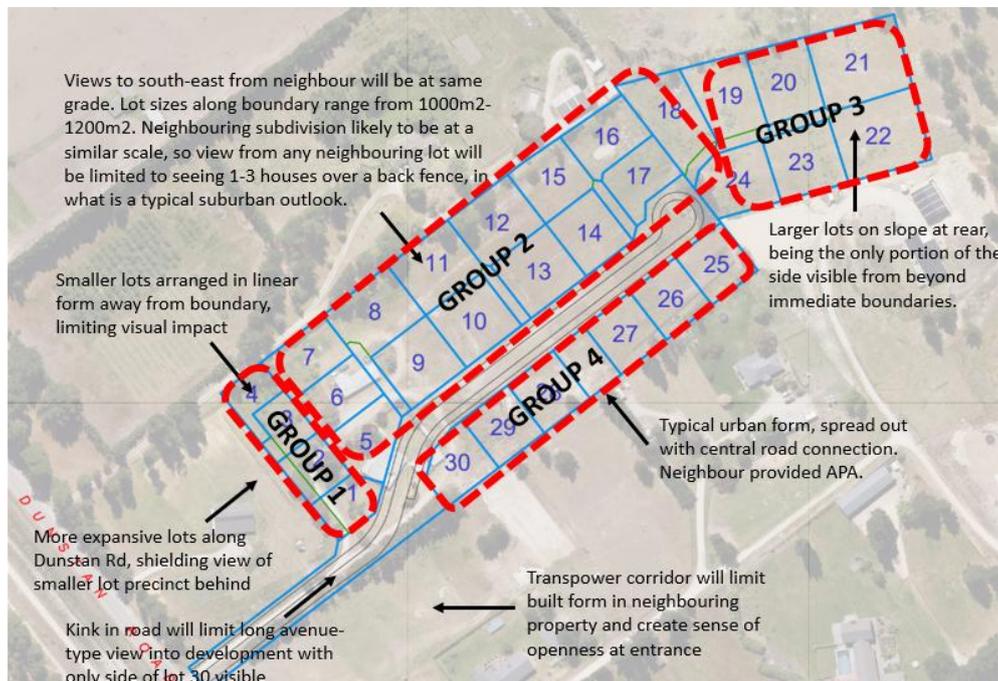


Figure 16. Lot groupings and overview of logic applied





GROUP 1, comprising Lots 1-4, being a node of smaller lots, has been subject to specific evaluation and feasibility assessment by Studio 3, as shown in Attachment 2 and the excerpt in Figure 4, above. These lots with proposed design controls on built form will create a high-quality living environment for residents. Being in a linear arrangement, it will function somewhat like an English Mews. Dwellings will be aligned in a row and be of a relatively consistent scale. This uniformity will lessen the sense of bulk of built form. With expansive open space to the north and being limited in height to a single story, no lot will suffer problematic shading or encroachment by its neighbour.

A generous 6m joint access lot/ROW will confer a further sense of space. The placement of this ROW also lessens the potential for shading of proposed lots on the neighbouring 157 Dunstan Rd site. At 6m width, the RoW will allow traffic to easily enter/exit lots and move freely along the RoW. The experience for other owners and residents across the Site will be to see a single building front from the vested road, looking at lot 1, with the remaining lots aligned behind. This node is placed towards the site entrance to lessen the impact of traffic through the balance of the site. From outside of the site, there will be little impact. They are on a flat area of the Site limiting visibility from outside. Just as with residents looking from the new vested road, neighbours to the north-west and southeast will see a single house with dwellings aligned in a row behind – limiting the visual impact of these smaller lots. The view of passers-by on Dunstan Road will be screened by houses on the neighbouring 157 Dunstan Road site.

This node is arranged to provide the benefits of diversity of lot size with minimal downside from higher density.

Group 2, comprising Lots 5-18, occupies the largest proportion of the site. Lots range from 930m² to 1260m². The lots are arranged two deep back from the road. All are accessed via ROW, rather than private crossings, reducing the number of separate crossings onto the vested road and improving the layout and utility of that main road corridor. These intervening ROWs will confer an additional sense of space, setting the houses further apart. In the context of urban lots in the Alexandra township, these are spacious lots. This grouping is situated on the flat and so the will not be visible from further afield. The only view of these lots from the outside will be from the neighbouring 165 Dunstan Road.





Having also been rezoned under PC19, lots in this property will, in time, look to the south towards a consistent lot and house typology.

Group 3, comprising Lots 19-24, occupies the rear or north-eastern portion of the site. This grouping has a larger average lots size. The two sites located on the slope at the rear are the largest lots within the proposed scheme, at 1820m² and 1690m² net area. These rear lots will be able to be viewed down the main road from within the site and they are also the only lots that will be generally able to be seen from outside of the site. Being at the farthest extent of the road through the site, having relatively large lots has the effect of placing less lots at the end of the road and therefore lessens the effects of traffic passing through the Site.

Lots 19 – 24, including the immediately adjoining ROW (i.e. areas identified as G,H and I on the plan of subdivision) have a gross site area of 1,468m² which is very close to the minimum requirement of 1,500m² as a restricted discretionary CRD activity.

It is considered that the relative shortfall of 32m² for each lot both individually and cumulatively would not be readily obvious when viewed from outside the site.

Group 4, comprising Lots 25-30 are all 900m². As with Group 2, they are on the flat part of the Site with minimal views from outside of the Site. The view from Dunstan Road will be of a single Lot and dwelling (Lot 30) with open space and plantings in front and the remaining lots arrayed in a linear form behind. . The 20m wide central road stub (Lot 32) between Lots 27 and 28 breaks this row and provides a sense of openness.

To summarise, the arrangement of lots across the site into four groupings is a considered and appropriate response to the characteristics of the site and to how the site will be experienced from beyond.

Access To Open Space For Recreation

Zones requiring large lots are typically located further away from town centres, where there is limited access to services, infrastructure and amenities, than higher density zoning. Providing large lots with private open space is appropriate were there isn't nearby public open space. This site is uniquely located near to public open space and amenity, including:



- 
- Central Otago's largest recreation facility, encompassing a multitude of sports fields, courts and swimming pool are within a 5-10 minute walk, or a <5 minute bike ride
 - The Alexandra golf course 250m away along Dunstan Road
 - A primary school and high school with courts and facilities within walking distance
 - All of which utilises the cycle trail corridor running adjacent to the site along Dunstan Road.

All proposed lots will have access to extensive public open space and because of this proximity there is not considered a case for a requirement for larger suburban lots to provide for on-site amenity to residents.

The 20m vested road corridor within the site, and the leg-in section excluding parking and providing a 3m walking and cycling path provides open space and offers opportunity for recreation within the Site.

By way of summary, the proposal is considered to respond positively to the context, features and characteristics of the site.

c. The extent to which the proposal provides wider community benefits, such as through protection or restoration of important features or areas, increased opportunities for connectivity or community facilities.

The site does not contain any areas of recognised high value, such as heritage items, nor is the site located nearby to a river or lake that could otherwise require consideration of public access or integration of benefits.

As noted above, careful consideration has been paid to access and connectivity within the site for walking and cycling, particularly in the context of the proximity to the Rail Trail on the opposite side of Dunstan Road. Carriageway consider this connectivity in the Traffic Assessment.

The Masterplan identifies landscaping and amenity plantings within the road reserve area which will provide wider amenity benefits to the subdivision.

The proposed Lot 32 future roading connection to LLRZ-zoned land to the south-east enables improved connectivity between properties as they are progressively developed





from their current rural lifestyle form into urban form and density. This rear connection through adjoining sites will lessen overall roading needs, improve land utilisation and should lessen the frequency of new crossings and intersections onto Dunstan Road itself. So it will deliver both utility and safety benefits.

d. Measures proposed to ensure higher density areas do not detract from the character and amenity of the wider surrounding area.

Commentary in (b) above is applicable to this matter of discretion under Rule LLRZ-R12.

Figures 17-19 above show views of the site from elevated perspectives across town to the south and east.

The following are noted about character and amenity of the wider area:

- Plan Change 19 has rezoned approximately 1.6km of land stretching along the north of Dunstan Rd from Rural Residential to urban. Therefore, it is appropriate to evaluate character not based on what exists now but on the transition to urban form that is underway and anticipated to develop into the future, this is reflected in the LLRZ Policy 1 which refers to the amenity of the zone, rather than a particular site or the environment as experienced at present.
- The character of the site is influenced by the MDR zoning located on the opposite side of Dunstan Road.
- The character and amenity of the wider area is strongly influenced by community facilities located nearby which are more often associated with low residential density and medium density zoning, including Molyneaux Park, The District's largest and most extensive sporting and recreation hub, which is located only 350m along Dunstan Road to the south-east, and the Alexandra golf course, located approximately 250m along Dunstan Road to the north-west. These two destinations provide both opportunity for recreation as well as contribute to a sense of openness across the surrounding environment.

The applicant's proposed development of the 157 Dunstan Road site, as set out in their application RC250055 provides for lots adjacent to Dunstan Road of between 1530-1620m². This ensures that the views from the road and Rail Trail corridor into the subject site will





maintain the openness anticipated in the LLRZ zone policies. With the slightly denser precincts arranged thoughtfully and out of site within the centre of the proposed development.

A final perspective that can be considered is from the elevated ridge to the north of the Site, looking across the Site to the south. This perspective will be from those rural residential lots scattered along the top of the tree belt, down to the township below.

e. Integration with transport networks, including walking and cycling.

The site has frontage to Dunstan Road and the Cycle Trail located on the opposite side of Dunstan Road. As noted above, the proposed subdivision Master Plan promotes walking and cycling, with the intention of providing safe and convenient access to Dunstan Road and across Dunstan Road to the Rail Trail corridor.

The proposed pedestrian and cycling pathway down the leg-in part of the proposed road has been generously designed at a 3.0m width. As shown in Figure 3, it will have only one Right Of Way crossing along its 93m length.

As described elsewhere, the Site is within easy walking and cycling distance of Dunstan High School, The Terrace Primary School, all of the varied recreational facilities in and around Molyneux Park, the Industry Lane complex and Café, and the local golf course. The Rail Trail and Dunstan Road itself provide easy and safe walking and cycling access to the wider Alexandra township.

f. The location, extent and quality of public areas and streetscapes, taking into account servicing and maintenance requirements.

The Masterplan in Figure 2 and **Attachment 2** shows the proposed configuration of roading throughout the development, including safe pedestrian and cycling routes, convenient parking, well resolved intersections and access lot entrances, as well as planting of the road reserve areas outside of the formed road.

The Masterplan identifies a paved crossing and amenity space in the road reserve area (south of Lot 5) and indicates this space to be utilised for street furniture, lawn, shrub and tree planting.





The indicative renders provided by Studio 3 (**Attachment 2**) illustrate the proposed street environment.

g. How the configuration of lots will allow for development that can readily achieve the outcomes sought in LLRZ-P1.

LLRZ P1 (Built Form) states:

Ensure that [development](#) within the Large Lot Residential Zone:

1. provides reasonable levels of privacy, outlook and adequate access to sunlight;
2. provides safe and appropriate access and on-site [parking](#);
3. maintains a high level of spaciousness around [buildings](#) and a modest scale and intensity of built form that does not unreasonably dominate adjoining [sites](#);
4. is managed so that relocated [buildings](#) are reinstated to an appropriate state of repair within a reasonable timeframe;
5. provides generous usable outdoor living space for residents and for tree and garden planting;
6. maintains the safe and efficient operation of the [road](#) network;
7. mitigates visual effects through screening of storage areas and provision of [landscaping](#); and
8. encourages water efficiency measures.

The proposal will readily provide reasonable levels of privacy, the average lot size is in the order of 1058m² (net site area) which is a large lot suburban section size (equivalent to the traditional quarter acre section) that will provide ample room for landscaping and amenity planting. Lots 1-4 are more traditional lower density residential suburban lots, typical across Alexandra township. Information provided by Studio 3 and discussed above confirms that these lots will still provide (more than) reasonable levels of privacy, outlook and adequate access to sunlight.

Each lot will be able to provide car parking for at least two vehicles.

The main road into the site is shown in the Studio 3 Master Plan (**Attachment 2**) work to accommodate in excess of twenty carparks, subject to further detailed design. Given the purely residential nature of this area, and it being unlikely to attract additional daytime parking by people leaving their car while at work, these parks are available to residents and visitors and are considered to provide ample parking options. Indeed, it would possibly only be spill over parking from the medium density residential zone on the south side of Dunstan Road that might bring additional vehicles into this area.





A high level of spaciousness around buildings will be able to be provided on all lots, noting that the LLRZ Framework as a maximum must anticipate ‘high level of spaciousness’ to be 6m separation, being the requirement for a separation from internal boundaries (i.e. 3m on each lot), with no other rules controlling the relationship between individual building location.

In this context, while the spaciousness on Lots 1-4 will be lower than the balance of development in the subdivision. Notwithstanding this, the 35% building coverage will ensure a modest scale and intensity of built form. Location specific bulk and location conditions are proposed which provide for limited exceedances of the LLRZ bulk and allocation standards.

Development arising from the subdivision is not considered to have the potential to unreasonably dominate adjoining sites.

All lots will be able to provide for generous usable outdoor living space and room for lawn, tree and garden planting. The indicative concept plans by Studio 3 shows further detail of how planting and outdoor space would be arranged on each of Lots 1-4.

The assessments by Carriageway have identified that the development will not result in safety or efficiency issues either internally or on the existing Dunstan Road network.

Addressing Limb (7) mitigation of visual effects through screening of storage areas and provision of landscaping, each lot will provide ample areas for storage areas and for these to be screened.

From a functional perspective, the Studio 3 Master Plan identifies the need for suitable areas for wheelie bins at the road edge to serve lots on private Rights of Way. These are shown inactively on the Master plan, excerpt in Figures 20 and 21 below.



Figure 60: Proposed wheelie Bin collection points for residents on JOALs from Studio 3 Masterplan





Figure 21: 3D Render of RoW entrance, showing wheelie bin collection area.

Screening elements within and between lots have not yet been designed because the specific design of buildings is not proposed. The layout of the subdivision does not indicate that there would be any inability to screening of storage areas. There is also ample space on the smallest lots with an area in the order of 550m².

In terms of matter (8) and water efficiency measures, the subdivision would be connected to reticulated water provided by the Council. Water efficiency measures are able to be implemented through general measures which may be applied on a wider basis such as water metering. This matter is not considered an impediment to the subdivision.

The matters under Policy LLRZ-P1 have been considered in the context of an effects assessment. The matters raised in this policy have been appropriately avoided or mitigated.

- h. Where the application also seeks provision for future built development to breach any of the standards, discretion is also restricted to those matters specified in the relevant standard.

Land use resource consents are sought on Lots 1-4 for building coverage (increase by 5%), setback from Roads (4.5m rather than 7m), and for accessory buildings to be located within the 3m internal boundary setback for a length no greater than 7m of the building. These are indicated in the Studio 3 design layout (**Attachment 2**) for that smaller-lot node.

The building coverage matters (Rule LLRZ-S4) require consideration of the compatibility of built form with the existing or anticipated character of the area, dominance of built form in the surrounding area, the extent to which a level of openness is maintained, and mitigation measures.





The building coverage exceedances are considered to be small, and there will be sufficient open space on each of Lots 1-4 for outdoor living, open space and tree and garden planting.

Design controls are proposed to limit building height to 6m.

For Lot 1, a road boundary setback of 4.5m is proposed, which is closer to the road boundary than 7m as required by Rule LLRZ-S5. The road boundary will be the proposed cul de sac road located internally within the subdivision. It is also noted that the shape of the road boundary for Lot 1 is relatively long, and a 7m setback requirement for Lot 1 may unnecessarily constrain appropriate development.

With regard to Rule LLRZ-S6 and locating accessory buildings within 7m setback, for a length of the building up to 7m, would enable a more efficient design of the lots and use of land for dedicated outdoor living and open space. Buildings will be expected to comply with the recession plane/height in relation to boundary requirement in Rule LLRZ-S3 which will assist with the moderation of built form along the boundary of adjoining properties.

6.5.1 Summary

The design of the subdivision accords with the matters identified for CRD, and meets the intent of the framework by providing a diversity of housing, a practicable roading design which will achieve safety, efficiency, while still retaining sufficient open space, amenity and privacy on all sites and across the subdivision area generally.

In terms of adverse effects associated with the matters to consider as part of the Comprehensive Residential Development and the non-complying residential density, the proposal will have less than minor adverse effects on the environment.

6.5.2 Subdivision Effects under the ODP Zoning

In the context of the existing ODP Rural Residential zoning, the change to an urban zoning of the site and surrounding area through Plan Change 19 will result in a major change to the character of this area. This proposal is entirely consistent with and promotes the objectives and policies of the new LLRZ zoning. Accordingly, any adverse effects on rural character and amenity can be considered minor.



6.6 Transport and Access

Carriageway Consulting has considered the current transport environment, effects of the proposal, potential design options and the ODP transport and roading related standards.

The Carriageway report supports the proposal, as summarised below:

- The traffic generated by the development of the subdivision can be accommodated on the adjacent roading network without capacity or efficiency issues arising.
- Traffic flows on Dunstan Road are very low at present, and development of the site generates comparatively little traffic, meaning that the site access operates under 'free flow' conditions, and Dunstan Road remains operating well within its maximum capacity.
- The site is well-located when considering non-car travel, with key destinations (including schools, recreation, employment and retail) located within an easy walking or cycling distance.
- The crash history in the vicinity of the site does not indicate that there would be any adverse safety effects from the proposal. Dunstan Road is flat and straight and therefore sight distances at the proposed site access intersection will be excellent.
- The lightly-trafficked environment means that there is ample opportunity for pedestrians to cross the road, but that a pedestrian refuge would be appropriate to be installed, and not necessarily directly at the Site given the wider area is also zoned LLRZ.
- Dunstan Road itself presently does not comply with the Council's Engineering Code of Practice, but the site will generate only a modest amount of traffic, and Dunstan Road is (and will remain) lightly-trafficked, meaning that in practice the current carriageway width will function adequately.
- Localised widening will be required on Dunstan Road at the site access intersection (to meet Figure 12.3 of the District Plan or Diagram D or E of the





Waka Kotahi Planning Policy Manual) and this can be readily provided within the existing legal road and proposed new road.

- The internal road within the site complies with the Council's standards, other than the access leg where there is a shortfall in the width as set out in Council's Code of Practice. However the expected formed width can be achieved, and there remains sufficient width for both pedestrian/cycle use and underground services.

Carriageway Consulting has also assessed the urban design and more nuanced aspects of the proposal against the parameters of NZS 4404 and considers that the Studio 3 Concept Design is appropriate.

For the above reasons the transport and access adverse effects will be minor.

6.7 Servicing

6.7.1 Water and Wastewater

As discussed above, the site can be serviced for water and wastewater. It is understood from reference to the Council's 2024/25 Annual Plan that Council has budgeted to extend the water and wastewater reticulation along Dunstan Road to service land included in PC19. We further understand that this is targeted to be delivered within the 2025/26 financial year.

The development will involve new reticulated pipework from Dunstan Road and along the extent of the proposed vested road, terminating at the vested road turning head end at the north-eastern end of the site.

Lot connections will be placed at the vested road-private lot boundaries, with multiple connections being appropriately arrayed at the entrance to private rights of way. Those private connections will, as is standard practise, be installed in conjunction with subsequent building activity by incoming lot owners.

Connections to Council's new Dunstan Road infrastructure will be subject to the timing of the installation of this infrastructure. However, provision is planned within the typical





validity period for a consent and on this basis connections to water and wastewater are not impediments to the subdivision.

6.7.2 Power and Telecommunications

Power and telecommunications are anticipated to be installed prior to section 224(c) and as noted above the confirmation of supply letters from Aurora (electricity) and Chorus (telecommunications) will be provided at the Engineering Approval stage.

6.8 Contaminated Land

As identified above, the site contains small areas with elevated arsenic concentrations. The total volume of impacted soil is estimated to be 5m³. Black stained oil was also encountered likely containing hydrocarbons from oil spills and the likely volume of impacted soil is 3m³.

Some areas were also identified with chemical readings below safe residential guidelines but above background levels. Consequently, these areas cannot be considered to be suitable for clean fill.

The total volume of impacted soil is estimated to be not greater than 10m³. Insight Engineering consider that it is highly unlikely that there will be a risk to human health associated with the subdivision if the following activities are undertaken:

- A Remediation Action Plan (RAP) and Contaminated Site Management Plan (CSMP) should be prepared to ensure that the potential risks to health are mitigated during and after implementation of the remedial strategy. The most likely remediation option is to remove the estimated 10m³ of material from the site and dispose of at an appropriate landfill, certified to receive contaminated material.
- If any further material showing signs of potential contamination (visual or olfactory) is unearthed on any parts of the site during future soil disturbance events, e.g. discovery of buried waste, work should stop immediately and a suitably qualified environmental practitioner should be engaged to assess the risk to human health prior to recommencing.





It is considered that conditions of consent can be imposed which require a Remediation Action Plan be submitted to Council for approval as part of the engineering acceptance process, prior to works commencing on site.

Should the site remediation be found to have left levels of residual hazardous chemicals at below safe habitable levels but still above background levels, the use of the ongoing site management plan is considered a practicable method to manage the potential receptor pathways and to ensure the affected areas are appropriately treated.

Dust from earthworks is a known issue for urban development within Alexandra during dry periods. This will need to be managed. Handling of contaminated materials should be undertaken at a time, or in a manner that avoids airborne transport of contaminants as dust or via other pathways during construction activity.

A RAP has been completed by Insight Engineering and is attached as **Attachment 4**⁸. This will be updated and re-submitted as part of the applicant's request for Engineering Approval.

Two options are couched to address the small volume of contaminated material, being removal of the contaminated material, which is feasible in this instance because the volume is small (10m³), and the other practicable option is to place the material beneath the road. With the latter option, the containment area would be over excavated to create space for the contaminated soil to be placed deep enough to ensure that the roading subgrade is not negatively affected. Mitigation measures are provided in Section 6 of the RAP.

For these reasons, the adverse effects on the environment from the contaminated land can be appropriately managed and will be minor.

6.9 Earthworks

Earthworks proposed as part of this application relate to the formation of roads and access ways, trenching of services and backfilling, and land disturbance associated with removal of

⁸ The RAP refers to 40 lots which was based on a previous proposal. This is not considered to affect the substance of the RAP or the recommendations of that report.





existing buildings and associated structures. The Decisions version PC19 rules limit excavations to 200m³ (Rule LLRZ-R11).

There are no earthworks required to prepare the building platforms on each allotment, nor substantial cut or fill to form the accesses. In addition, no water bodies or sensitive areas are potentially affected by the activity.

Traffic management associated with reforming the crossing onto Dunstan Road can be managed through the subdivision approval process. It will be necessary to engage suitably qualified contractors and obtain the relevant road management and temporary works approvals from the Council prior to undertaking works on or in close proximity to Dunstan Road.

Earthworks of the nature and scale proposed are commensurate with anticipated residential subdivisions of the LLRZ.

It is also reiterated that the activity will require a earthworks resource consent from the Otago Regional Council because the earthworks are greater than 2,500m in area and involve contaminated land. It is anticipated that the construction related effects of earthworks can be managed through that process. Adverse effects on the environment arising from this subdivision application, governed by the Regional Council, will be minor.

6.10 National Grid

The activity will not result in buildings located within National Grid setback. Nonetheless, Transpower have been contacted via the Patai Developer Portal and have provided their support for the application, which is in **Attachment 8**.

The adverse effects of the activity on the National Grid will be minor.

6.11 Positive effects

The activity will provide for suburban residential activity as anticipated by PC19. In this context, the activity will facilitate social and economic well-being through the supply of housing in the Alexandra area.





6.12 Conclusion

The adverse effects of the proposal will be avoided or mitigated by the design of the subdivision and appropriate conditions of consent such that they are less than minor.



7 Section 104 RMA

7.1 Actual and Potential Effects (section 104(1)(a))

Actual and potential effects on the environment have been outlined in the assessment of effects above. The adverse effects of the activity are appropriate and consent can be granted.

7.2 Statutory Documents (section 104(1)(b))

Section 104(1)(b) states that the consent authority must subject to part 2 have regard to:

(b) any relevant provisions of—

- (i) a national environmental standard;*
- (ii) other regulations;*
- (iii) a national policy statement;*
- (iv) a New Zealand coastal policy statement;*
- (v) a regional policy statement or proposed regional policy statement;*
- (vi) a plan or proposed plan*

The LLRZ objectives and polices are of most relevance to the activity, followed by the District-wide urban development provisions.

While the Operative Rural Residential Zone provisions are technically applicable, they are not considered relevant to this activity and so little weighting has been applied to them.

7.2.1 Large Lot Residential Zone

LLRZ-P1 Built Form

Ensure that development within the Large Lot Residential Zone:

- 1. provides reasonable levels of privacy, outlook and adequate access to sunlight;*
- 2. provides safe and appropriate access and on-site parking;*
- 3. maintains a high level of spaciousness around buildings and a modest scale and intensity of built form that does not unreasonably dominate adjoining sites;*
- 4. is managed so that relocated buildings are reinstated to an appropriate state of repair within a reasonable timeframe;*
- 5. provides generous usable outdoor living space for residents and for tree and garden planting;*
- 6. maintains the safe and efficient operation of the road network;*



7. *mitigates visual effects through screening of storage areas and provision of landscaping; and*
8. *encourages water efficiency measures.*

These policy matters were considered in detail in the above AEE, as directed by the assessment matters of Rule LRZ-R12. The assessment concludes that adverse effects would be avoided or mitigated.

In the context of a policy assessment, the activity will not be contrary to the matters identified in Policy LLRZ-P1.

LLRZ-P2 Residential Activities

Provide for a range of residential unit types and sizes to meet the diverse and changing residential demands of communities.

The provision of a range of residential lot sizes has been considered in the AEE, as promoted by the matters of discretion. As described, the proposal provides for a range of lots that will also result in a variety of building coverage outcomes.

The allotment sizes and the 30% coverage rule will provide an indicator to the market (potential future lot owners) as to the size of dwellings and overall building coverage. The limitations of the lot sizes and building coverage will encourage a range of dwelling types across the subdivision.

The larger lots will also enable minor residential units to be established within the 30% building coverage restriction. This will also assist with a diversity of housing.

A proposed development control will require that minor residential units be built as an extension of (i.e. be contiguous with) the main dwelling for lots of 1000m² or less. This control is intended to limit the impact of built form and maintain a sense of openness, as anticipated within the LLRZ.

The activity is consistent with this policy, and for the purposes of Section 104D RMA the activity is not contrary to this policy.

LLRZ-P9 Comprehensive Development

Provide for a higher density of development on larger sites, where development is undertaken in a comprehensive manner and:

1. *the overall layout provides for a variety of lot sizes and opportunities for a diversity of housing types while still being designed to achieve the built form outcomes in LLRZ-P1;*
2. *the design responds positively to the specific context, features and characteristics of the site;*



- 
3. *areas of higher density development are located or designed so that the overall character of the surrounding area is retained; and*
 4. *the development delivers a public benefit, such as public access, reserves or infrastructure improvements.*

The overall layout will provide for a variety of lot sizes and opportunities for a diversity of housing types and has been assessed as achieving the built form outcomes in Policy LLRZ-P1. The activity accords with Limb (1).

The design also responds positively to context of the site, locating higher density lots (Lots 1-4) on the eastern part of the site which is flat, closest to Dunstan Road, while still being screened from the Road by 157 Dunstan Road to the south (Lot 2 DP 518150).

The design has also responded to the constraint in the legal road width along the leg-in section through the absence of parking, the provision of a single 3.0m wide footpath, the identification of a crossing, and provision for landscaping. Parking, footpaths, street furniture, wheelie bin pick-up locations and trees are all incorporated into within the areas where the road carriageway exceeds 20m.

The more remote and potentially visible lots located at the north-eastern extent of the site, comprising Lots 19-24. These are larger in size with an average net site area of 1381m²⁹. The allotment configuration at this rear portion of the site, adjacent and beneath the containment of the tree belt on the hillslopes to the east of the Site means that the Site can absorb the proposed development.

For the above reasons, the proposal accords with matters 2 and 3.

The final matter of the policy is (4) that the development delivers a public benefit, such as public access, reserves or infrastructure improvement.

The site is not located near any water bodies, nor does it adjoin public open space. Therefore, the opportunity to enable access to public land does not exist.

While the Masterplan design seeks to optimise open space within the road corridor, and particularly around the kink in the vested road adjacent to lots 1, 5 and 30, it is

⁹ And a gross site area including the immediate ROW sections of 1,442m².



acknowledged that this creates an incremental rather than material and notable public benefit Which would for the most part be internal to the subdivision.

The Masterplan also shows provision for street planting and landscaping furniture which will deliver public benefit through high amenity urban area and functional public space. This can provide for open space but is internal to the subdivision and does not provide for benefits beyond the immediate environment that would evolve through the development of the site.

Having regard to the matter of the proposal including a reserve, the Council's 2024 Open Space and Recreation Strategy Policy identifies that Council prefers two types of parks; neighbourhood parks (3000m² - 5000m²) or Soort and Recreation Parks with a minimum area of 10ha¹⁰.

Section 9.4 of the Council's Open Spaces and Parks Strategy states the following with regard to land acquisition through subdivision.

Proposed subdivisions must adhere to provision guidelines in this Strategy. In the first instance, subdivision developments will be assessed to determine if proposed new residential allotments are located within a suitable walking distance from existing open spaces.

The subdivision must provide off-road connections to existing open space. If not, it must provide a suitable Neighbourhood Park, adhering with the Recreation Aotearoa Parks Categories Guidelines above.

If new open space (such as a Neighbourhood Park) is not required, the development will contribute through financial contribution requirements for open space. Council may strategically provide additional open spaces (e.g. acquisitions, easements, covenants, reserve contributions, etc.) to address network gaps and to establish better connectivity between existing open spaces and large residential areas.

It is considered that the because of the relatively small number of lots and the very close access to large scale community facilities (Molyneaux Park) and Alexandra town centre, and the open space network fronting the site, there is already convenient access to public open spaces and community facilities.

It is noted that the subdivision will provide off-road access to open space, for instance, the 3m wide shared footpath and cycle path along the road leg-in, and footpath areas in the wider subdivision provide direct access to Dunstan Road and then the Cycle Trail. A suitably

¹⁰ Refer to the Open Spaces and Recreation Policy Document 2024. [Open Spaces and Recreation Strategy 2024-54](#)





designed pedestrian crossing across Dunstan Road, incorporating if deemed necessary a central refuge, is promoted by the Applicant through the recommendations of the Carriageway Consulting assessment.

In this case, development contributions are a more appropriate contribution than provisions of a reserve of the scale required in the Council's Open Space and Parks Strategy.

In the context of the site, and its location and that the site and its neighbouring LLRZ sites will for the most part constitute infill development from the legacy Rural Residential zoning, the provision of the landscape and amenity area within the road reserve kink, and the voluntary enablement of an internal roading and pedestrian connection (Lot 32) into the neighbouring LLRZ-zoned properties to the south east. An illustration of how that connection might be extended through the neighbouring LLRZ land is shown in **Figure 7**. This roading stub is supported by the neighbour who's land it connects with, as evidenced by their Affected Party Approval, attached as **Appendix 10**.

The activity is consistent with this policy, and for the purposes of Section 104D RMA the activity is not contrary to Policy LLRZ-P9.

The relevant objectives which implement the above policies are:

LLRZ-01 Purpose of the Large Lot Residential Zone

The Large Lot Residential Zone provides primarily for residential living opportunities.

LLRZ-02 Character and Amenity Values of the Large Lot Residential Zone

The Large Lot Residential Zone is a pleasant, low-density living environment, which:

- 1. contains predominantly low-rise and detached residential units on large lots;*
- 2. maintains a predominance of open space over built form;*
- 3. provides good quality on-site amenity and maintains the anticipated amenity values of adjacent sites; and*
- 4. is well-designed and well-connected into the surrounding area.*

The proposal will be for residential living and achieves Objective LLRZ-O1.

Objective LLRZ-O2 requires a pleasant, low-density living environment. The limbs of the objective refer to a predominantly low-rise and detached residential units on large lots. All





lots exceed the minimum requirement anticipated in the LDR (400m²), and overall, the average lot size of 1377m² will ensure that the development resulting from the subdivision is characterised as a large lot residential subdivision. Although the density of allotments is greater than the 1500m² anticipated by the rule framework, the building coverage over the lots will be similar to that anticipated under a conventional subdivision with allotment sizes of 1500m² minimum.

The subdivision design and potential configuration of Lots 1-4, the roading sections and masterplan provided by Studio 3 illustrate that good quality open space and amenity will be achieved. Moreover, that the amenity values of adjacent sites will be maintained.

The activity is consistent with this policy, and for the purposes of Section 104D RMA the activity is not contrary to Objective LLRZ-O2.

7.2.2 ODP Section 6 Urban Areas

ODP Objective 6.3.4 and related Policies 6.4.1 and 6.4.2 are relevant to the proposal and have been retained by the Council as part of its review of urban provisions in the ODP.

6.3.4 Objective - Urban Infrastructure

To promote the sustainable management of the District's urban infrastructure to meet the present and reasonably foreseeable needs of the District's communities.

6.4.1 Policy - Maintenance of Quality of Life within Urban Areas

To maintain and, where practicable, enhance the quality of life for people and communities within the District's urban areas through:

- (a) Identifying and providing for a level of amenity which is acceptable to the community; and*
- (b) Avoiding, remedying or mitigating the adverse effects on the community's social, economic and cultural wellbeing and health and safety which may result from the use, development and protection of natural and physical resources, and*
- (c) Recognising that change is inevitable in the use of land to enable the community to provide for its wellbeing.*

The activity is consistent with Policy 6.4.1 because it will provide for new urban development in a location which has been identified as appropriate for urban development through PC 19. The amenity outcome is considered to be acceptable in that while the density exceeds that anticipated in the CRD rule, the subdivision will be developed to create a good outcome from an amenity perspective, both internally and externally.



6.4.2 Policy - Expansion of Urban Areas

To enable the expansion of urban areas or urban infrastructure in a manner that avoids, remedies or mitigates adverse effects on:

- (a) Adjoining rural areas.*
- (b) Outstanding landscape values.*
- (c) The natural character of water bodies and their margins.*
- (d) Heritage values.*
- (e) Sites of cultural importance to Kai Tahu ki Otago.*
- (f) The integrity of existing network utilities and infrastructure, including their safe and efficient operation.*
- (g) The life supporting capacity of land resources.*
- (h) The intrinsic values of areas of significant indigenous vegetation and habitats of significant indigenous fauna.*

The activity will provide for new urban development within an area anticipated for new urban development, while mitigating effects on any adjoining urban area, by virtue that the site is located adjacent to existing urban residential land on the opposite side of Dunstan Road and surrounded by Rural Residential Zoned land that resembles a peri urban environment.

The site is not located within or adjacent to an ONL, a waterbody, heritage or cultural area.

Policy matter (f) refers to the integrity of existing network utilities and infrastructure. The preliminary investigations and feedback from the Council through PC 19 is that the site and this subdivision can be readily serviced for water, and wastewater capacity limited to 40 lots before additional investigations are needed to ensure capacity of the wider wastewater network would not be compromised. The activity is consistent with Policy (g), and consistent with Policy 6.4.2 overall.

The activity is consistent with, and for the purposes of Section 104D RMA the activity is not contrary to Objective 6.3.4 and Policies 6.3.4.1 and 6.3.4.2.

7.2.3 ODP Section 12 Transport (District Wide)

The following transport related objectives and policies are relevant:

12.3.1 Objective - Safe and Efficient Roading Network

To promote the safe and efficient operation of the District's roading network

12.4.1 Policy - Parking, Loading and Manoeuvring



To avoid, remedy or mitigate adverse effects on the safe and efficient operation of the roading network by requiring:

- (a) Safe and efficient access points to the roading network, and*
- (b) Off-road loading and manoeuvring space and facilities, and*
- (c) Off-street parking, where these are appropriate.*

The proposal will maintain a safe and efficient roading network, asset out in the assessment of effects above and in the Carriageway Report.

For these reasons the proposal is considered to achieve Objective 12.3.1 of the District Plan.

7.2.4 ODP Section 16 Subdivision

The following objectives and policies of section 16 are relevant:

16.3.1 Objective - Adverse Effects on the Roding Network

To ensure that subdivision avoids, remedies or mitigates adverse effects on the safe and efficient operation of the District's roading network.

Carriageway Consulting have assessed the effects of the proposal on the roading network and confirmed that the resulting residential activity will be appropriate in terms of effects on Dunstan Road and the wider transport network. The activity is consistent with this objective.

16.3.2 Objective - Services and Infrastructure

To ensure that subdivisions provide all necessary services and infrastructure without adversely affecting the public interest and the ongoing viability of those services and infrastructure.

This matter has been identified and assessed in the AEE above and description of the proposal. The Council have advised that servicing is targeted for completion within the 25/26 financial year.

16.3.4 Objective - Amenity Values

To ensure, where appropriate, that amenity values of the District created by the open space, landscape and natural character values, and areas of significant indigenous vegetation, significant habitat of statutorily managed sports fish and game are not adversely affected by subdivision.

The site is not located within a sensitive rural landscape. The site has been developed to rural residential densities under its previous zoning and can be presently characterised as a peri-urban environment. This is anticipated to evolve to an urban character pursuant to the LLRZ zoning notified by PC19.



16.3.10 Objective – Provision for Future Development

To ensure subdivisions are designed to facilitate an appropriate and co-ordinated ultimate pattern of development having regard to the particular environment within which the subdivision is located.

As discussed above, the subdivision design has been undertaken with reference to surrounding properties, open space, amenity and infrastructure. The proposal includes a future road connection to LLRZ land to the south, which will help provide for a co-ordinated pattern of development with adjacent lots to the south-east. The proposal is of a substantially similar nature to that anticipated across the length of the LLRZ along the north of Dunstan Road. It responds to both the close proximity of services and amenities, as well as the high-density zoning now enabled on the immediately opposite side of Dunstan Rd, by incorporating a range of lot sizes and an average yield lower than the stated LLRZ 1500m² average.

16.4.7 Policy - Subdivision Design

To require that the design of subdivision, where relevant to the intended use, provides for the following matters:

- (a) Facilitates convenient, safe and efficient access to all allotments including pedestrian access where appropriate.*
- (b) Facilitates the safe and efficient provision and operation of services and infrastructure.*
- (c) Facilitates access to passive solar energy resources.*
- (d) Facilitates any foreseeable subsequent development or redevelopment including the economic provision of roading and network utility services.*
- (e) Facilitates adequate provision of, or contribution to, the open space, recreational and reserve needs of the community with physical links to existing reserve areas where this is practicable.*
- (f) Facilitates an appropriate level of access to heritage sites, natural features and water bodies where appropriate.*
- (g) Facilitates development which keeps earthworks to a minimum.*
- (h) Facilitates retention of the heritage values of a site or area.*

The subdivision can be undertaken in a way that provides safe and convenient pedestrian, cycling and vehicle access, and can be implemented to ensure services and roading are installed in accordance with Council's standards via the subdivision process. The activity is not contrary to this objective.

The following PC19 subdivision objectives and policies are applicable to the Application.

SUB-01 Subdivision Design

The subdivision of land within residential zones creates sites and patterns of development that are consistent with the purpose, character and amenity values anticipated within that zone.



SUB-P1 Creation of New Allotments

Provide for subdivision within residential zones where it results in allotments that:

- 1. reflect the intended pattern of development and are consistent with the purpose, character and amenity values of the zone; and*
- 2. are of a size and dimension that are sufficient to accommodate the intended built form for that zone;*
- 3. minimise natural hazard risk to people's lives and properties; and*
- 4. are adequately served by public open space that is accessible, useable and well-designed.*

SUB-P2 Dual Use

Recognise the recreation and amenity benefits of the holistic and integrated use of public spaces, through:

- 1. encouraging subdivision designs which provide multiple uses for public spaces, including stormwater management and flood protection areas; and*
- 2. integration of walking and cycling connections with waterways, green spaces and other community facilities.*

The matters raised in Objective SUB-O1 and Policies SUB-P1 and P2 have been considered in the preceding assessment.

Overall, the activity is consistent with the objectives and policies Section 16 Subdivision and the Residential Zones subdivision objectives and policies.

7.2.5 ODP Section 4 Rural Resource Area

The following objectives apply to the Rural Resource Area which, as noted above, is technically relevant due to the site being subject to appeals.

4.3.1 Objective - Needs of the District's People and Communities

To recognise that communities need to provide for their social, economic and cultural wellbeing, and for their health and safety at the same time as ensuring environmental quality is maintained and enhanced.

The proposal will achieve this objective by way of provision of new urban land on a site which has already been rezoned by the Council through PC19 from RRZ to urban.

The above description of the activity and assessment of effects has identified that the environmental quality of the environment will be maintained and enhanced. The proposal is not contrary to this objective.



4.3.7 Objective - Soil Resource

To maintain the life-supporting capacity of the District's soil resource to ensure that the needs of present and future generations are met.

The site is now zoned LLRZ which does not provide for the life supporting capacity of the soil resource to be maintained, at least in a productive context. The subdivision will not maintain the soil resource. But this policy is of no relevance to the activity.

4.3.3 Objective – Landscape and Amenity Values

To maintain and where practicable enhance rural amenity values created by the open space, landscape, natural character and built environment values of the District's rural environment, and to maintain the open natural character of the hills and ranges.

4.4.2 Policy – Landscape and Amenity Values

To manage the effects of land use activities and subdivision to ensure that adverse effects on the open space, landscape, natural character and amenity values of the rural environment are avoided, remedied or mitigated through:

- (a) The design and location of structures and works, particularly in respect of the open natural character of hills and ranges, skylines, prominent places and natural features,*
- (b) Development which is compatible with the surrounding environment including the amenity values of adjoining properties,*
- (c) The ability to adequately dispose of effluent on site,*
- (d) Controlling the generation of noise in back country areas,*
- (e) The location of tree planting, particularly in respect of landscape values, natural features and ecological values,*
- (f) Controlling the spread of wilding trees.*
- (g) Encouraging the location and design of buildings to maintain the open natural character of hills and ranges without compromising the landscape and amenity values of prominent hillsides and terraces.*

The proposed subdivision will result in a fundamental change in the character of the site from rural residential to urban residential and would therefore have adverse effects on the rural amenity values of the outskirts of Alexandra in this vicinity. The degree of these adverse effects is mitigated by the modest sensitivity of the area to change of this nature but more fundamentally that these policies are of no relevance (despite being applicable).

Because of the very limited relevance the activity has to these Rural objectives and policies, the activity is considered not to be contrary to them.

4.4.10 Policy – Rural Subdivision and Development

To ensure that the subdivision and use of land in the Rural Resource Area avoids, remedies or mitigates adverse effects on:



- 
- (a) *The open space, landscape and natural character amenity values of the rural environment in particular the hills and ranges,*
 - (b) *The natural character and values of the District's wetlands, lakes, rivers and their margins,*
 - (c) *The production and amenity values of neighbouring properties,*
 - (d) *The safety and efficiency of the roading network,*
 - (e) *The loss of soils with special qualities,*
 - (f) *The ecological values of significant indigenous vegetation and significant habitats of indigenous fauna,*
 - (g) *The heritage and cultural values of the District,*
 - (h) *The water quality of the District's surface and groundwater resources, and*
 - (i) *Public access to or along the rivers and lakes of the District, particularly through the use of minimum (and average) allotment sizes.*

The proposed subdivision will result in a fundamental change in the character of the site from rural residential to urban and would therefore have adverse effects on the rural amenity values of the outskirts of Alexandra in this vicinity. The degree of these adverse effects is mitigated by the modest sensitivity of the area to change of this nature but more fundamentally that these policies are of no relevance (despite being applicable).

In this sense, we conclude the activity is not contrary to applicable subdivision and development objectives and policies.

7.2.6 NESCS

The provisions of the NESCS have been considered in the above assessment.

The proposal is considered to be in accordance with the intent of the NESCS through identifying and applying an appropriate management framework for the disturbance of land formerly containing activities on the HAIL register.

7.2.7 Operative Regional Policy Statement for Otago 2019 (ORPS)

There is one objective and two policies from the Regional Policy Statement which are relevant to the proposal. These are summarised below:

Objective 4.5 – urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments;

Policy 4.5.1 – that urban growth is provided for by the provision of sufficient capacity, and coordinating the extension of urban areas with infrastructure development programmes to provide infrastructure in an efficient and effective way; and

Policy 4.5.2 – which requires the strategic integration of infrastructure, including through coordinating the design and development of infrastructure with land use change in growth and redevelopment planning.



In respect of Objective 4.5 and Policy 4.5.1 above the activity will provide for urban residential development in an appropriate location in terms of the spatial extent of urban growth in Alexandra. In respect of Policy 4.5.2 the activity can be accommodated within the identified water and wastewater capacity servicing, albeit within the next two years.

The activity is consistent with the ORPS.

7.2.8 National Policy Statements

7.2.9 National Policy Statement Urban Development 2020

The relevant national policy statement is the NPSUD 2020. The following assessment has been undertaken in the context of PC19 and the intentions for the site to be zoned urban.

The relevant provisions are identified and discussed as follows:

1.5 *Implementation by tier 3 local authorities*

Tier 3 local authorities are strongly encouraged to do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3 of this National Policy Statement, adopting whatever modifications to the National Policy Statement are necessary or helpful to enable them to do so.

Provision 1.5 of the NPSUD is not an objective or policy but an 'implementation direction' for Tier 3 local authorities.

Theme: Making room for growth

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) have or enable a variety of homes that:*
 - (i) meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) enable Māori to express their cultural traditions and norms; and*
- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*



- (e) support reductions in greenhouse gas emissions; and
- (f) are resilient to the likely current and future effects of climate change.

The proposed activity will assist the Council in achieving Objective 1 and Policy 1 by increasing the variety (and quality – through the construction of dwellings to prevailing modern building standards) of homes available within the urban extent of Alexandra, are readily accessible in terms of location to the Cycle Trail and convenient location to public amenities and recreation opportunities in urban Alexandra.

Theme: Housing affordability

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

The proposed activity will also contribute to housing affordability through increased housing supply and supply-side competition within the urban Alexandra area.

Theme: Clarifying amenity and change in urban environments

Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters;

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this NPS
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and that those changes:
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities and future generations, including by providing increase and varied housing densities and types; and
 - (ii) are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this NPS to provide or realise development capacity
- (e) the likely current and future effects of climate change

Policy 6 recognises that within urban environments changes to the environment do not equate to adverse effects where the development accords with the opportunity for new housing and varied urban forms, and that urban development contributes to a well-functioning environment. The proposed activity will accord with Policy 6 by realising greater housing opportunities in the LLRZ as anticipated by the Comprehensive Residential Development provisions of the District Plan.



7.3 Section 104(c) Other Matters

No particularly relevant other matters or documents have been identified.

The Vincent Spatial Plan could be considered an “other matter”. However, that spatial plan has been implemented through PC 19, and so does not require any additional elaboration.

7.4 Section 104D of the RMA

Section 104D of the RMA requires that for non-complying activities:

... a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either—

(a) the adverse effects of the activity on the environment (other than any effect to which section 104(3)(a)(ii) applies) will be minor; or

(b) the application is for an activity that will not be contrary to the objectives and policies of—

(i) the relevant plan, if there is a plan but no proposed plan in respect of the activity; or

(ii) the relevant proposed plan, if there is a proposed plan but no relevant plan in respect of the activity; or

(iii) both the relevant plan and the relevant proposed plan, if there is both a plan and a proposed plan in respect of the activity.

The adverse effects on the environment will be minor, as detailed in this assessment.

The activity will not be contrary to the objectives and policies of the District Plan.

The application is able to be considered under S104 generally.

7.5 Part 2 of the RMA

The following matters of national importance under section 6 shall be recognised and provided for:



- 
- (a) *the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:*
 - (b) *the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:*
 - (d) *the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:*
 - (e) *the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:*

The proposal does not engage any other section 6 matters.

Other matters under section 7 that particular regard shall be had to include:

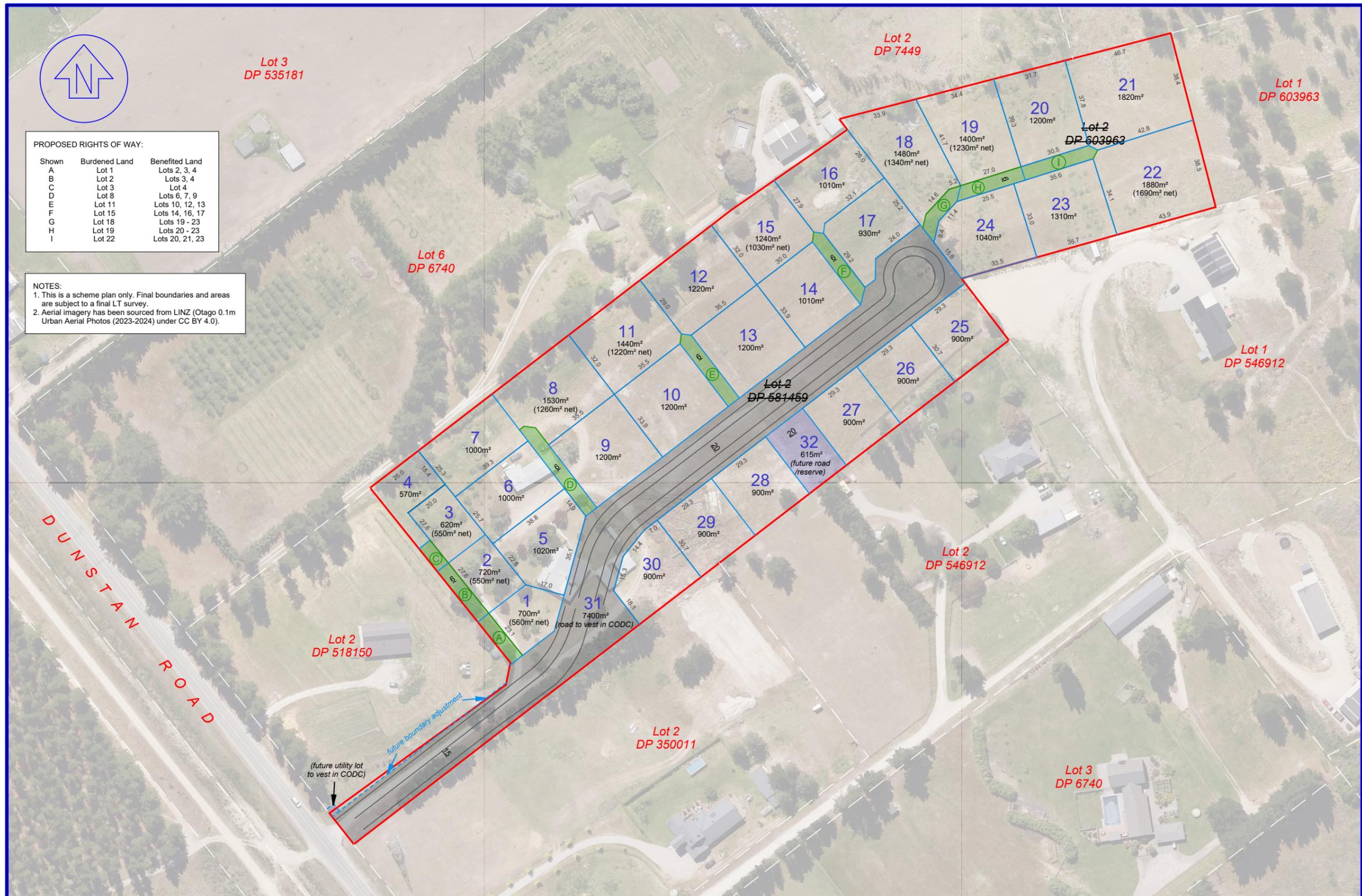
- (b) *the efficient use and development of natural and physical resources:*
- (c) *the maintenance and enhancement of amenity values:*
- (f) *maintenance and enhancement of the quality of the environment:*
- (g) *any finite characteristics of natural and physical resources:*

The proposed activity will help facilitate the efficient use of land and resources, while maintaining environmental quality.

The purpose of the RMA, as set out under Section 5(2) is to promote the sustainable management of natural and physical resources.

The proposal represents an efficient use of natural and physical resources, and will be undertaken in a manner which avoids, remedies and mitigates potential adverse effects on the environment. It is considered that the proposal is consistent with the purpose and principles of the RMA and achieves Part 2 of the RMA.





**LOTS 1 - 32 BEING A PROPOSED SUBDIVISION
 OF LOT 2 DP 581459 & LOT 2 DP 603963
 155 DUNSTAN ROAD, ALEXANDRA**

Date:	14 Feb 2025
Scale:	1:1500 @ A3
Drawn by:	JS
Client:	Glenoir LP
Job No:	3114_06F



studio3
landscape architects

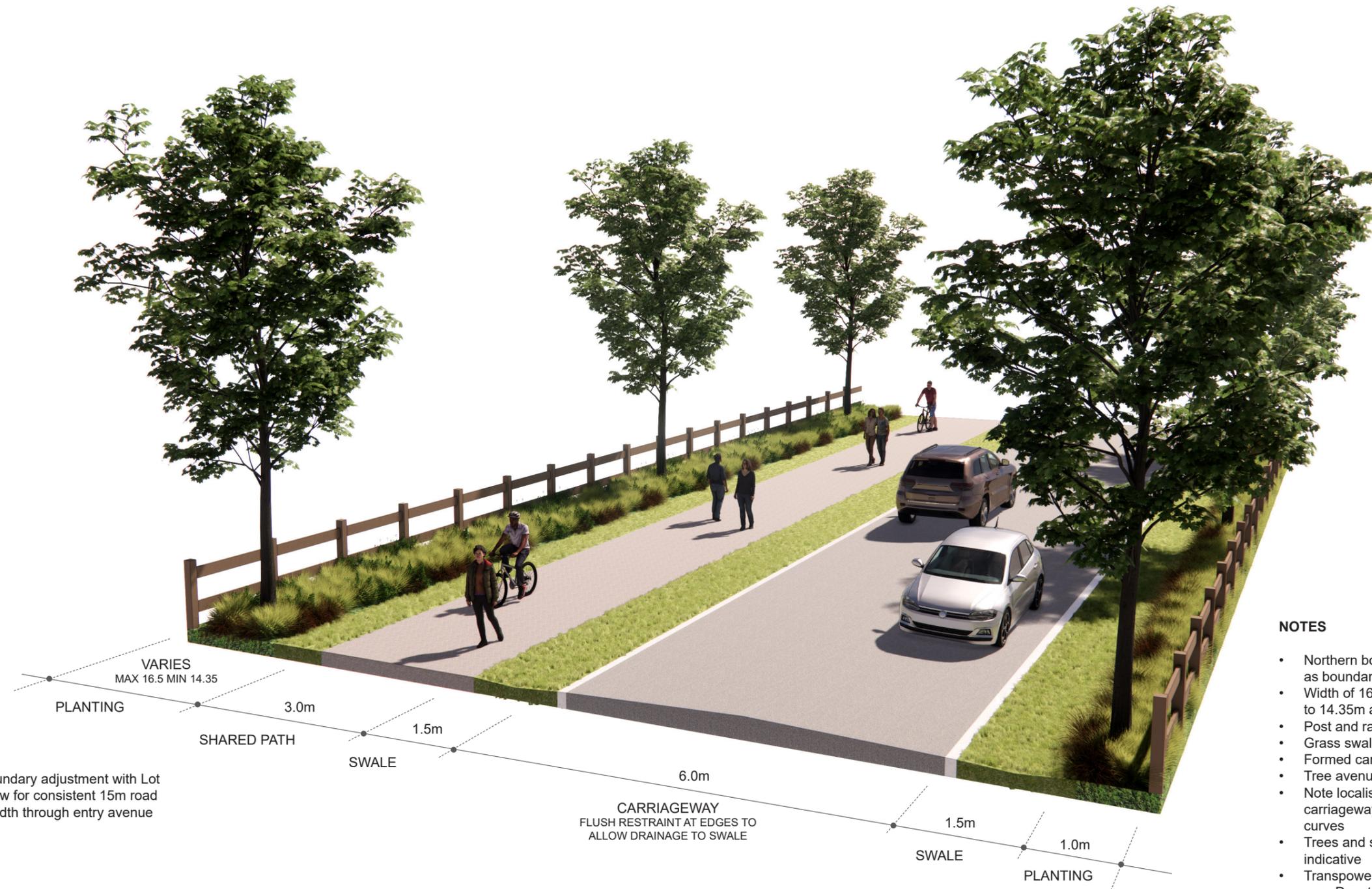
SCALE 1 : 750 @ A1 (1 : 1500 @ A3)
STATUS **DRAFT** NOT A WORKING DRAWING - NOT FOR CONSTRUCTION
DATE 09.04.2025
REVISION REVISION A

FOR NAVIGATE PROPERTY



GLENOIR ESTATE - 155 DUNSTAN ROAD
Concept Masterplan

SECTION A
Entry Avenue



NOTE
Future boundary adjustment with Lot 157 to allow for consistent 15m road corridor width through entry avenue

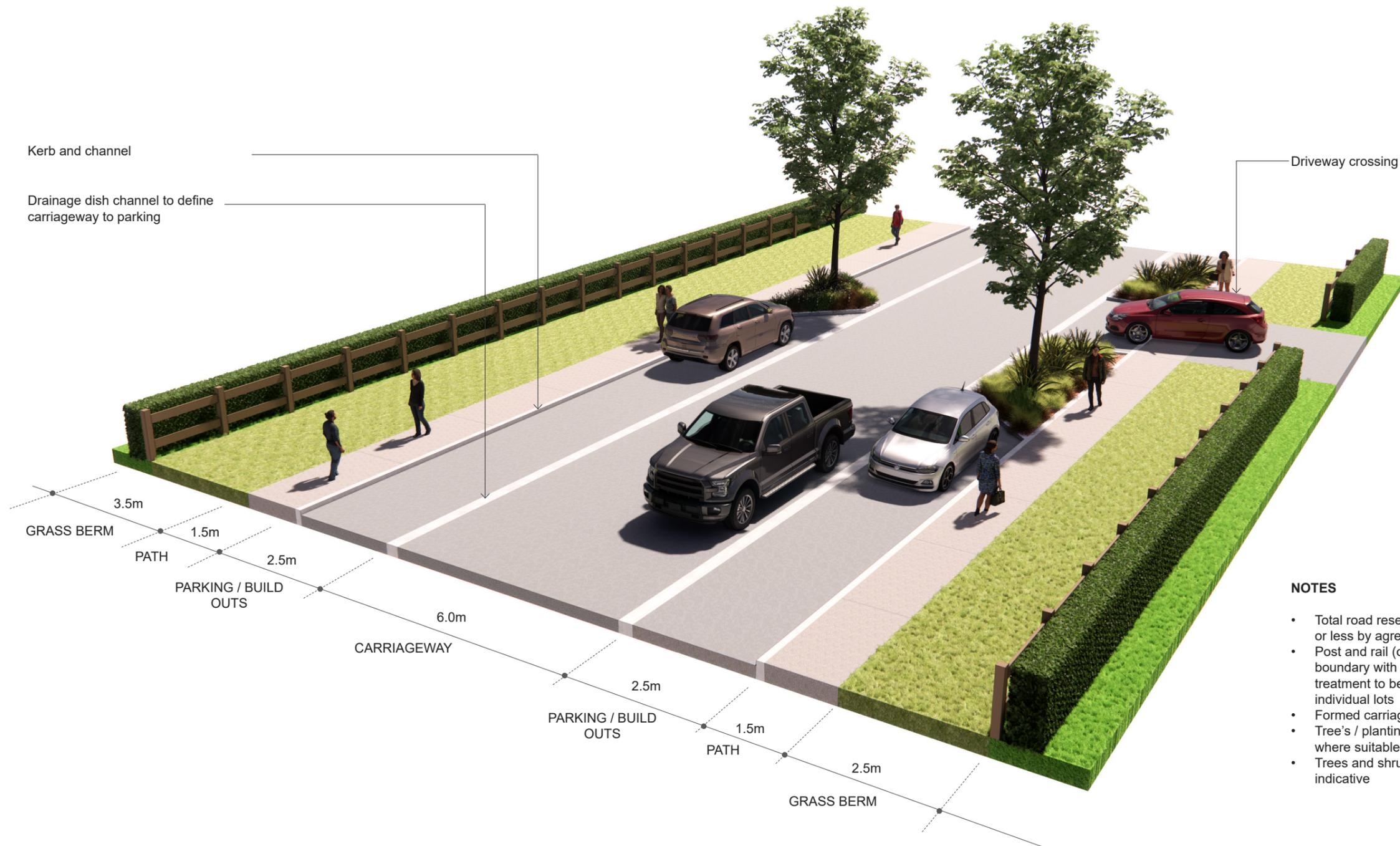
- NOTES**
- Northern boundary varies in width as boundary tapers
 - Width of 16.5m at entry tapering to 14.35m at narrow point
 - Post and rail boundary treatment
 - Grass swales
 - Formed carriageway
 - Tree avenue
 - Note localised widening to carriageway required where road curves
 - Trees and shrubs shown are indicative
 - Transpower easement zone near Dunstan Road to be free of planting



CROSS SECTIONS
SCALE NOT TO SCALE
STATUS **DRAFT** NOT A WORKING DRAWING - NOT FOR CONSTRUCTION
DATE 27.02.2025
REVISION REVISION A

GLENOIR ESTATE - 155 DUNSTAN ROAD
NAVIGATE PROPERTY LTD

SECTION B
Central Spine Road - Typical



NOTES

- Total road reserve width of 20.0m or less by agreement with council
- Post and rail (or similar approved) boundary with clipped hedge treatment to be condition of individual lots
- Formed carriageway
- Tree's / planting in buildouts where suitable
- Trees and shrubs shown are indicative

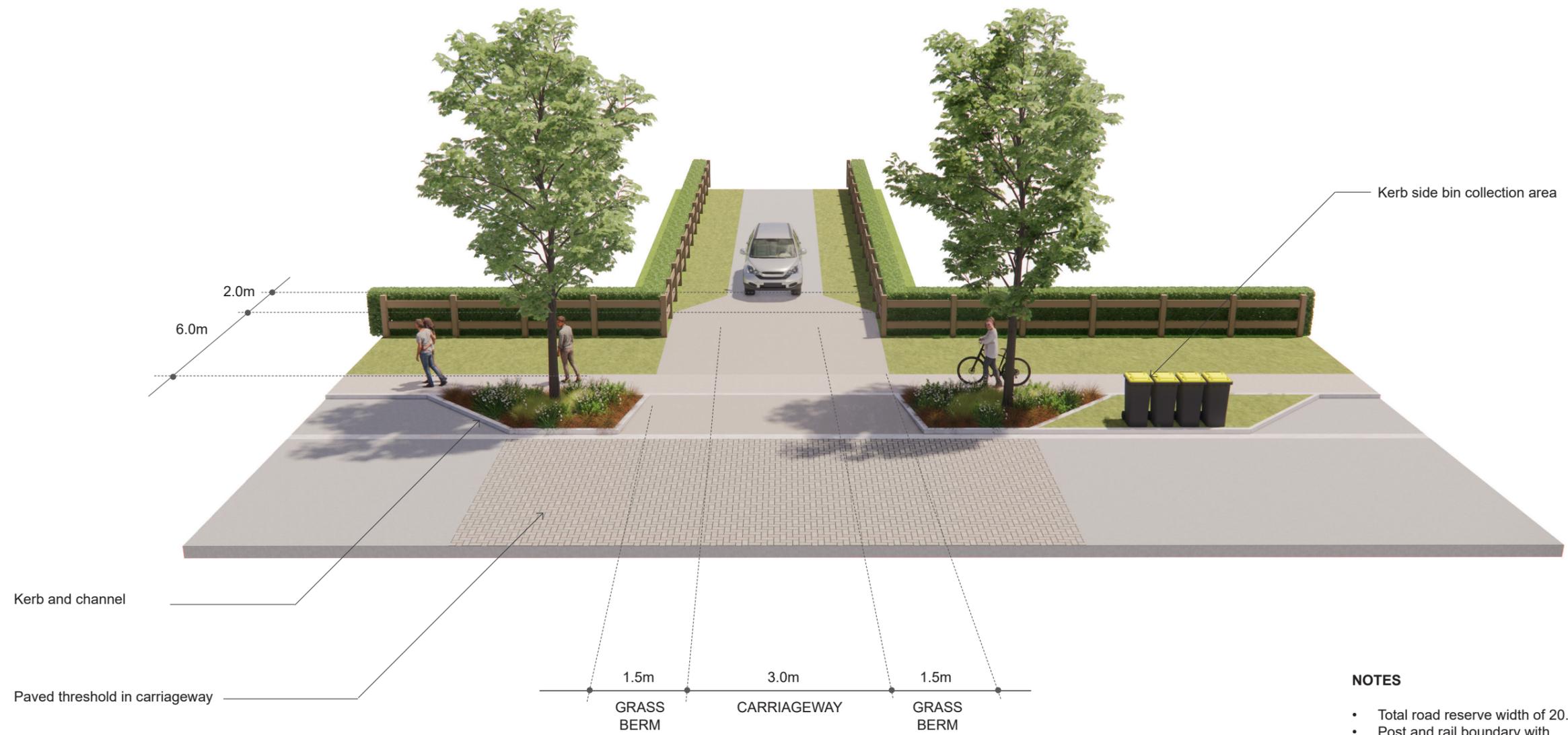


CROSS SECTIONS

SCALE NOT TO SCALE
 STATUS **DRAFT** NOT A WORKING DRAWING - NOT FOR CONSTRUCTION
 DATE 27.02.2025
 REVISION REVISION A

GLENOIR ESTATE - 155 DUNSTAN ROAD
 NAVIGATE PROPERTY LTD

SECTION C
Typical ROW



- NOTES**
- Total road reserve width of 20.0m
 - Post and rail boundary with clipped hedge treatment to be condition of individual lots
 - Formed carriageway
 - Trees and shrubs shown are indicative
 - Tapered exit from driveway to carriageway



CROSS SECTIONS
 SCALE NOT TO SCALE
 STATUS **DRAFT** NOT A WORKING DRAWING - NOT FOR CONSTRUCTION
 DATE 27.02.2025
 REVISION REVISION A

GLENOIR ESTATE - 155 DUNSTAN ROAD
 NAVIGATE PROPERTY LTD



11 October 2023

Shanon Garden
Navigate Property Limited
PO Box 84
Cromwell 9342

Re. Detailed Environmental Site Investigation for proposed subdivision at 155 Dunstan Road, Alexandra

Our Reference: 23036

1 Introduction

Shanon Garden of Navigate Property Limited requested that JKCM Ltd, trading as Insight Engineering (IE), undertake a preliminary and detailed environmental site investigation (PSI and DSI) of the property at 155 Dunstan Road and the westernmost portion of the property at 129 Gilligans Gully Road, Alexandra (herein referred to as "the site").

We understand that the site is proposed to be subdivided into 40 lots for residential purposes, and this report will be provided to Central Otago District Council (CODC) as part of the subdivision consent application.

The purpose of this PSI was to assess the suitability of the site for subdivision and residential development, as required by the Resource Management (*National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health*) Regulations¹ (herein referred to as the NES). This investigation was undertaken in general accordance with the Ministry for the Environment (MfE) *Contaminated Land Management Guidelines No. 1: Reporting on Contaminated Sites in New Zealand*².

Figure 1 (Appendix 1) indicates the location of the properties and investigation area. The proposed subdivision plan is provided in Appendix 2.

2 Objectives of the Investigation

The objectives of this report were to investigate the site history, in terms of potentially contaminating activities, and assess whether a risk to human health is likely to result from subdivision, development and residential use of the site.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

2.1 Approach

IE completed the following scope of work to satisfy the investigation objectives:

2.1.1 Review of Site Information

Several sources were contacted for information relating to the sites past and present uses and to identify any other environmental issues which may be on record. This consisted of:

- Review of previous environmental site investigation reports for 155 Dunstan Road;
- Undertaking a site walkover to describe current site conditions and assess whether any visual or olfactory evidence of contamination is present at the site;
- Interviewing the site owner, to obtain information relating to potentially contaminating activities that may have been undertaken at the site;
- Review of publicly available data describing the local geology and hydrogeology;
- Search the ORC HAIL Database to ascertain whether the site or nearby properties are recorded on the database;
- Reviewing the CODC NES Records Search statement to determine whether any records of contamination at the site are held in their database; and
- Reviewing publicly available historical aerial photographs and maps of the site and surrounding area.

2.1.2 Intrusive Investigation

The following scope of work was undertaken upon completion of the review of site information:

- Collect twenty three (23) soil samples from 23 locations across the site where potential for contamination impacts had been identified;
- Visual and olfactory inspection of soil samples in the field;
- Submit 23 soil samples to Hill Labs for analysis of various contaminants associated with each location (asbestos presence / absence, a suite of common heavy metals, organochlorine pesticides and / or petroleum hydrocarbons);
- Assess laboratory results for the soil samples against the adopted human health criteria for residential land use and land development / excavation activities / maintenance of underground services;
- Formulation of a conceptual site model (CSM); and
- Present a combined PSI / DSI report outlining our findings, the suitability of the site for residential subdivision, development and use.

3 Site Description

Site information is summarised in Table 1.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Table 1: Site Information

Location	155 Dunstan Road; and 129 Gilligans Gully Road, Alexandra
Legal Description	Lot 1 DP518150 Lot 3 DP399742
Property Ownership	Navigate Property Limited
Current Site Use	Rural Residential / Lifestyle Block
Proposed Site Use	Residential
Site Area	Approximately 41,500 m ² (4.15 ha)
Territorial Authorities	Central Otago District Council Otago Regional Council
Zoning	RR (Rural Residential)

The site setting is summarised in Table 2.

Table 2: Site Setting

Topography	<p>The majority of 155 Dunstan Road is considered to be relatively flat, or very gently sloping with a gradient towards the south west. The north eastern quarter of the site contains the gently sloping toe end of a landscape-scale terrace orientated north west / south east. The slope steepens and becomes moderate to steep approximately 100 m beyond the north eastern property boundary, including the easternmost site boundaries within 129 Gilligans Gully Road.</p> <p>Several low (~200 mm above the surrounding site surface) ridges are present along a north west / south east axis in the south western paddock. These are remnants of a border dyke irrigation system that had been used for flood irrigation in that part of the site.</p> <p>An earth bund extends from the south western paddock, along the northern property boundary, to the boundary between 155 Dunstan Road and 129 Gilligans Gully Road. It is presumed that this feature was associated with the transfer of water from a water race that was formerly located between 155 Dunstan Road and 129 Gilligans Gully Road.</p>
Local Setting	<p>The site is located on the northern outskirts of Alexandra. The surrounding areas consist generally of rural residential, horticultural / agricultural land and reserve / recreational areas. A relatively large industrial site, operated by Fulton Hogan, is located roughly 300 m south east of the property. Dunstan Road extends north west / south east along the south western property boundary.</p>

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Table 2 (cont.): Site Setting

Nearest Surface Water & Use	The Clutha River / Mata-Au, used as a source of potable water as well as for recreational and irrigation purposes, is located approximately 1.3 km west of the south western corner of the site. Surface water is also present in farm dams on properties towards the east, north and north east. The nearest of these is located approximately 440 m towards the east of the north eastern corner of the site.
Geology	<p>The GNS New Zealand Geology Webmap³ indicates that the site is within the "Late Pleistocene outwash deposits" geological unit described as '<i>Unweathered to slightly weathered, loose, sandy to silty, well rounded gravel usually on large outwash plains.</i>'</p> <p>The surface material observed during the sit visit is described as silty sand.</p>
Hydrogeology	<p>According to information provided by ORC, the depth to water recorded in nearby wells (G42/0615, G42/0751, G42/0798 and G42/0828) ranged between 18.4 and 19 m below ground level (bgl). The nearest of those wells is G42/0751 which is located roughly 55 m south of the site.</p> <p>Therefore, given the site elevation varies slightly between the south western and north eastern ends, groundwater at the site is expected to be encountered between approximately 18.5 m at the south western side and up to 24 m bgl on the north eastern end.</p> <p>Predicted groundwater flow direction is based on an ORC⁴ report and a diagram provided by ORC (Appendix 3). Based on this information, the site is located over the Dunstan Flats Aquifer and groundwater is considered likely to flow towards the south-south-west.</p>
Groundwater Abstractions ⁵	<p>Several groundwater abstraction consents were issued for properties located at, or within 250 m of, the site:</p> <ul style="list-style-type: none"> • Consent number RM17.206.01 was issued in 2017 for JC and SE Symons to construct up to two bores, including one production bore at Lot 5 DP6740 (155 Dunstan Road) for the purpose of accessing groundwater. • Consent number 2008.377 was issued in 2008 for IN and GA Stewart to construct a bore for accessing groundwater at Lot 1 DP350011 (149 Dunstan Road). • Consent number RM15.210.01 was issued in 2015 for PJ and CA Roberts to construct a bore for accessing groundwater at Lot 3 DP6740 (131 Dunstan Road). • Consent number 2002.395 was issued in 2002 for the McDonald Family Trust to construct a bore for domestic supply of two houses at Pt Lot 2 DP6740 (127 and 129 Dunstan Road). • Consent number RM20.361.01.395 was issued in 2020 for Christian Philippe Marie Martin and Angela Marie Martin to construct one bore for the purpose of accessing groundwater at Lot 2 DP523111 and Lot 1 DP350011 (now Lot 2 DP546912 at 149 Dunstan Road).

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Table 2 (cont.): Site Setting

Groundwater Abstractions (cont.) ⁵	<ul style="list-style-type: none"> Consent number RM18.316.01 was issued in 2018 for Benjamin Maurice Sanders to construct up to two bores with a maximum of one production bore for the purpose of accessing ground water at Lot 1 DP350011 (Possibly 149 Dunstan Road). <p>Three other consents are shown as being associated with the neighbouring property towards the north (165 Dunstan Road). The legal descriptions referenced on the consent documents do not exist on the CODC GIS website⁶, therefore it is not known whether these consents truly do relate to the neighbouring land.</p>
Groundwater Abstractions (cont.) ⁵	In general, all three consents were issued to G and J Bell to abstract 3 million litres of water per month for irrigation and domestic use. The consents, numbered 1950, 3767 and 2000.322 were issued in 1980, 1991 and 2000, respectively.
Discharge Consents ⁵	IE searched the ORC consents database within 250 m of the site and found no current or historical discharge consents that have the potential to have resulted in an impact at site.

3.1 Current Site Conditions

Claude Midgley of IE completed a site walkover inspection on 23 August 2017, 19 May 2022 and on 7 July 2023. Observations made at that time are summarised in Table 3 and photographs are presented in Appendix 4.

Table 3: Current Site Conditions

Visible signs of contamination	<p>In 2017, several indicators of potential contamination were observed on site:</p> <ul style="list-style-type: none"> Evidence of known and unknown materials being burnt on the site surface and within a refuse pit was observed in several locations. A vehicle dismantling / wrecking area was located near to the northern corner of the site, along the northern property boundary. Other wrecked vehicles were located in several other parts of the property. Debris and salvaged components of demolished buildings, including stockpiles of treated timber and railway sleepers, as well as metal objects / machinery and hot water cylinders of unknown age, was observed in several parts of the site, some covering relatively large areas. <p>In 2022, some of the miscellaneous items stored between the dwelling and the eastern site boundary had been removed. Several indicators of potential contamination remained:</p> <ul style="list-style-type: none"> Treated timber posts were stored in a small stack near to the centre-south of the site. Oil drums were stored in a stack near to the centre-south of the site. Ash was present on the site surface near to the centre-south of the site and beneath some of the trees in the orchard in the western corner of the site. Electrical fuse boards with potentially asbestos-containing material as the backing were observed near to the site boundary directly east of the dwelling. Several 44 gallon drums were used to incinerate waste near to the site boundary directly north of the dwelling.
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Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Table 3 (cont.): Current Site Conditions

	<ul style="list-style-type: none"> Minor oil stains were observed at the entrance to the vehicle workshop / shed located north west of the dwelling. <p>In 2023, the site had been cleared of the miscellaneous items stored between the dwelling and the eastern site boundary. However, a few indicators of potential contamination remained: Small (0.5 m) to medium (2-5 m) oil stains were observed in three locations.</p>
Surface water appearance	No surface water was present at the site during the walkover.
Current surrounding land use	Rural residential land is located towards the south east. Rural residential land with areas of horticultural use is located towards the north. Reserve / recreational areas are located towards the south west and west. The portion of the site furthest towards the north east (129 Gilligans Gully Road) appears to be disused / undeveloped.
Local sensitive environments	No sensitive environments are located within 200 m of the site.
Visible signs of plant stress	No visible signs of plant stress were noted.
Additional Observations (if any)	A small cherry orchard was noted near to the centre of the site. Ash had been placed at the bases of some of the trees.

3.2 Interview with Current Residents

John Symons (*pers. comm.*) provided the following information in 2017:

Mr Symons owned the property between 1970 and 2023. The previous property owner had operated a poultry hatchery and several buildings had been present on the property for that purpose. The previous owner had used the remainder of the property for the cultivation of lucerne.

With the exception of the existing dwelling, Mr Symons demolished all of the other buildings. Mr Symons indicated that the former buildings were timber framed and clad with corrugated iron. Mr Symons stated that electric heat sources were used in the hatchery, as opposed to liquid or solid fuel options.

Since owning the land, Mr Symons grew lucerne in the south western paddock for the first 20 years using the border dyke irrigation system and sourcing water from a race located north east of the property. The cherry orchard was planted in the late 1980s and no persistent pesticides / herbicides were used.

Mr Symons also operated a construction company, which had a storage yard in Alexandra. Excess plant and materials were stored at the site but, to his knowledge, he has not stored asbestos-containing products. Metal drums on the property were not used for storing waste oil or chemicals from the dismantling of vehicles, an activity for which his grandchildren use part of his property.

The Lions Club also use part of the property for the production of firewood, sourced from pine trees that are cut and dried near to the north eastern property boundary. Domestic waste generated at the property is burned and buried in refuse pits in that part of the site.

A large fuel storage tank observed at the north eastern property boundary was used to store water for pigs, which are kept in an adjacent enclosure.

Mr Symons considers the neighbouring horticultural activities to pose no risk of contamination by spray drift, because the operator of that venture is a certified organic grower.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

3.3 Existing Environmental Reports

IE completed a preliminary environmental site investigation (PSI) of 155 Dunstan Road in 2017. The PSI was included in a subdivision application to create a new property in the south western portion of the site, between the existing dwelling and Dunstan Road. The information in that report has been included in this document for completeness.

3.4 ORC Property Database

IE reviewed the ORC Hazardous Activities, Industries and Bore Search database¹⁰ on 7 July 2023. The search confirmed that a portion of the site is recorded in the database as site number HAIL.01538.01 for a Category G3 (Landfill sites) and G5 (Waste disposal to land) activities.

The contamination status of the site is 'Not Investigated'. No further information was available in the ORC database.

3.5 CODC NES Records Search

The NES Records Search (Appendix 5) completed by Rachel Stanton, Project Information Memorandum Officer, on 23 August 2023 contains the following information:

- Five resource consents (RCs) were found in the CODC records. Two of the RCs, issued in 2006 and 2007 respectively, relate to stockpiling of materials. The nature of the stockpiled materials is unknown and may include a range of sources / materials, some of which may trigger NES¹ requirements. The remaining three RCs relate to a two lot subdivision in 2017, a change of consent condition in relation to the subdivision in 2017 and a boundary adjustment in 2022.
- Fifteen building permits / consents were issued between 1951 and 2009. The majority of those relate to development of structures associated with the poultry operation between 1951 and 1965.
- The property has been the subject of an environmental investigation. A preliminary site investigation identified numerous HAIL and potential HAIL activities on site. These were A11 pest control, A17 storage tanks or drums for diesel, A18 wood treatment or perseveration, D5 engineering workshops with metal fabrication, F4 motor vehicle workshops, G4 scrap yards including automotive dismantling, wrecking or scrap metal yards and G5 waste disposal to land. The PSI has concluded that the disturbance of soil on Lot 2 DP 581459 may pose a risk to human health if soil is disturbed or ingested from produce grown in the potentially impacted soil.
- Aerial photographs taken between 2003 and 2019 show evidence or association with all HAIL items identified in the PSI dated 31/04/2017.
- The document concludes with a disclaimer that Council does not hold records directly relating to activities on the HAIL and recommends that further investigation is undertaken to determine whether any HAIL activities exist on the site.

3.6 Certificates of Title

The Certificates of Title (Appendix 6), indicates that the site was part of a larger block that was originally designated as railway reserve, which became Council Reserve land. The land was leased to private individuals several times between the late 1800s and mid 1900s. After the land was subdivided to form the current extents *circa* 1905, private individuals again leased the block. In 1949, Ben Simpson Brook and Mona Brook leased the land for 14 years. Stanley Charlton Knowles and William McDonnell leased the site in equal shares with the Brooks from 1955, after which title was

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

transferred to the Brooks on 15 October 1970. The current Certificate of Title indicates that Mr and Mrs Symons purchased the property under a family trust, with their accountant Clifford Clarke Brunton as a third trustee, on the same day (15 October 1970).

3.7 Review of Historical Aerial Photographs and Maps

Publicly available photographs were viewed on the National Library of New Zealand Website⁷, VC Browne & Son website⁸, CODC GIS website⁶, Google Earth⁹ and Retrolens¹⁰. These photographs and maps have been reviewed to obtain information on the past uses of the site and surrounding area. One high resolution image was purchased from the VC Browne website (Figure 2, Appendix 1).

Aerial photographs taken between 1956 and 2023, as well as Topomap¹¹ images produced between 1949 and 2019, have been reviewed. Table 4 summarises the features visible in each image.

Table 4: Historical Aerial Photographs

1949 ¹¹	<p>The map does not show a significant amount of detail regarding the land use. The approximate location of the site is based on georeferencing the image according to known roads within the Alexandra township.</p> <p>The only detail shown intersecting the site is a double dashed line extending towards the north west from Ngapara Street, near to the intersection with Symes Street, possibly indicating the presence of an informal track.</p>
1959 ⁷	<p>The photograph is taken from an oblique angle, but most of the site is visible. The view of, what appears to be, several buildings near to the centre of the site is partially obstructed by trees along the southern site boundary. No other significant features are visible on the site.</p> <p>The neighbouring properties towards the south east appear to be used for residential purposes, with only two small dwellings and no apparent horticultural / agricultural activities visible. Horticultural use areas are visible on the properties towards the north and north west.</p>
1959 ¹⁰	<p>The dwelling is visible in the location observed on site during the walkover inspection. Four long (25 to 35 m) and narrow (5 to 6 m) buildings are visible towards the north and east of the dwelling. With the exception of the orchard area in the western corner of the site, the remainder of the site appears to be vegetated with turf. Shelter belts are visible along all of the boundaries at 155 Dunstan Road. A water race is visible at 129 Gilligans Gully Road, crossing the site along a north west / south east orientation.</p> <p>In the surrounding landscape, buildings are visible on the neighbouring property towards the east and north of 155 Dunstan Road. Orchards are visible on the neighbouring property towards the north, as well as another property further south east of 155 Dunstan Road.</p>
1968 ⁷	<p>Only a small portion of the site, specifically the southern corner and approximately three quarters of the southern property boundary, is visible in the bottom portion of the image. The area where the access track / driveway runs along the southern boundary is visible.</p> <p>Parts of a few structures are visible approximately half way along the southern property boundary.</p> <p>In the surrounding land, an electricity pylon is visible just south of the southern corner of the site. A structure and a relatively small area of linear features, indicating possible horticultural activities, is visible in the north eastern part of the neighbouring</p>

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Table 4 (cont.): Historical Aerial Photographs

1968 (cont.) ⁷	<p>property towards the south of the site. Further south, the properties appear to be used for residential purposes, with no clear evidence of significant agricultural / horticultural use within at least 500 m of the site. A cluster of objects, that may represent stockpiles of soil or plant cuttings, is visible near to the south western boundary of 147 Dunstan Road.</p> <p>On the opposite side of Dunstan Road, south west of the site, the land appears disused with the exception of another electricity pylon approximately 500 m south west of the site.</p>
1968 ⁷	<p>The photograph is taken from a location north of the site, facing south. Several details are clearly visible, but some portions of the site are obscured either by trees or shadows cast by trees along the northern boundary.</p> <p>Up to nine separate buildings, including the existing dwelling, are visible in a complex located near to the centre of 155 Dunstan Road. The majority of the structures are long and narrow and some smaller objects / structures are visible adjacent to the buildings. No other significant features are visible within the property boundaries.</p> <p>Features visible in surrounding properties appear generally unchanged compared with previous photographs. Although, from this angle, a possible connection to a water race is visible near to the northern corner of 155 Dunstan Road.</p>
1969 ¹¹	<p>Markings on the map indicate the presence of a cluster of buildings near to the centre of the site. No other significant details are apparent.</p>
1974 ⁸ (Figure 2)	<p>The site is viewed from roughly the same angle as one of the photographs taken in 1968. It appears that most of the buildings have been demolished, with only two or three of the original structures remaining (including the existing dwelling).</p> <p>Areas of lighter coloured land, indicating possible soil disturbance, are visible on the neighbouring property towards the north (165 Dunstan Road). No other new significant features are visible.</p>
1976 ¹⁰	<p>Two of the long, narrow buildings have been removed. Two new buildings have also been constructed in the area north and north west of the dwelling.</p> <p>In the surrounding landscape, a new orchard has been planted on a property further north of the site. No other significant features are visible.</p>
1979 ¹¹	<p>No significant changes are apparent, compared with the 1969 map.</p>
1979 ¹⁰	<p>No significant changes are apparent, compared with the 1976 photograph.</p>
1984 ¹⁰	<p>One of the new buildings that was first visible in the 1976 photograph has been removed from the area north of the dwelling. Several unidentifiable objects are visible in the centre and north eastern portion of 155 Dunstan Road. No other new significant features are visible.</p>
1989 ¹¹	<p>No significant changes are apparent, compared with the 1979 map.</p>
1999 ¹¹	<p>Only three black squares remain near to the centre of the site, indicating that some buildings had been demolished.</p>
2006 ⁹	<p>The layout of buildings and distribution of objects across the site is similar to what was observed during the site walkover.</p> <p>A small orchard is visible in the western corner of the site, adjacent to a workshop</p>

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Table 4 (cont.): Historical Aerial Photographs

2006 (cont.) ⁹	building towards the east and the residential dwelling towards the south east. Building materials, vehicles and small sheds are visible across the majority of the area towards the north east of the dwelling and workshop. Another relatively large storage shed / workshop is located near to the south eastern site boundary, north east of the dwelling.
2006 (cont.) ⁹	A circular feature, which may be a small earth dam, is visible near to the north eastern corner of 155 Dunstan Road. Horticultural areas are visible on the neighbouring property towards the north. No other new significant features are apparent.
2007 ⁹	With the exception of what appears to be disturbed soil in the former location of the circular feature near to the north eastern corner of 155 Dunstan Road, no other new significant features are visible.
2009 ¹¹	No significant changes are apparent, compared with the 1999 map.
2010 ⁹	The extent of the area used for storage of materials in the north eastern portion of 155 Dunstan Road has decreased. No other new significant features are visible.
2011 ⁹	A new soil stockpile is visible adjacent to a darker coloured object in the area north east of the easternmost shed / workshop. This may represent a refuse pit, but the image resolution is too poor to confirm that possibility. No other new significant features are visible.
2012 ⁹	No new significant features are visible.
2013 ⁶	The former possible refuse pit appears to have been back-filled and a new possible refuse pit excavated near to the north eastern boundary of 155 Dunstan Road, south west of a large tree. No other new significant features are visible.
2014 ⁶	The possible new refuse pit appears to have been back-filled and another new possible refuse pit excavated a few metres towards the south east, south of the large tree. No other new significant features are visible.
2015 to 2019 ⁹	No new significant features are visible.
2019 ¹¹	One additional black square has been added to the site, north and west of the other black squares, indicating that a new building had been constructed.
2021 ⁹	Some of the miscellaneous items have been removed from the eastern portion of 155 Dunstan Road. In the surrounding landscape, new dwellings have been constructed directly west and east of the site. No other new significant features are visible.
2023 ⁹	The majority of the miscellaneous items have been removed from 155 Dunstan Road. A few sheds and unidentifiable objects remain within approximately 100 m of the dwelling. The northern corner of 155 Dunstan Road contains an area of disturbed ground, where the vegetation has been removed from the surface. No other new significant features are visible.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

3.8 Summary of Identified Hazardous Activities and Industries

The following activities noted on the MfE Hazardous Activities and Industries List ¹¹ (HAIL) have been identified within 155 Dunstan Road during review of the site history (no HAIL activities were identified within 129 Gilligans Gully Road):

- Category A11 – Pest control including the premises of commercial pest control operators or any authorities that carry out pest control where bulk storage or preparation of pesticide occurs, including preparation of poisoned baits or filling or washing of tanks for pesticide application.
 - This category is represented by the likely use of pesticides associated with the orchard. It is considered possible that organochlorine pesticides could have been used in the orchard area. The risk to human health is unknown.
- Category A17 – Storage tanks or drums for fuel, chemicals or liquid waste.
 - This category is represented by the presence of 44 gallon oil drums, some of which may have leaked or spilled onto the surrounding soil. The risk to human health is considered likely to be moderate.
- Category A18 - Wood treatment or preservation including the commercial use of anti-sapstain chemicals during milling, or bulk storage of treated timber outside.
 - This category is represented by the storage of treated timber in isolated parts of the site, as well as the use of treated timber fence posts on parts of the site. The risk to human health is considered likely to be moderate.
- Category D5 – Engineering workshops with metal fabrication.
 - This category is represented by the workshop building in proposed Lots 6 and 8. The risk to human health is unknown.
- Category F4 – Motor vehicle workshops.
 - This category is represented by the workshop building in proposed Lots 6 and 8. The risk to human health is unknown.
- Category G4 – Scrap yards including automotive dismantling, wrecking or scrap metal yards.
 - This category is represented by the storage of miscellaneous metal objects in various parts of the site, including wrecked vehicles that had been partially dismantled. The risk to human health is considered likely to be moderate.
- Category G3 – Landfill sites and Category G5 – Waste disposal to land.
 - This category is represented by the disposal of waste in a pit within the proposed road, as well as an area with charcoal fragments in the ground surface of proposed Lot 37. The risk to human health is considered likely to be minor.
- Category I – Any other land that has been subject to intentional or accidental release of a hazardous substance in sufficient quantity that it could be a risk to human health or the environment.
 - This category is represented by the demolished former poultry farm buildings that could have contained asbestos building materials. The risk to human health is unknown.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

4 Intrusive Investigation

Under the NES, the proposed activity is considered to meet the definitions provided under Regulation 5(6) changing the use of a piece of land that has Regulation 5(7) a HAIL activity undertaken on it.

The application for subdivision and a change of land use could not be considered to qualify as a Permitted Activity under Regulation 8(4), because it is not highly unlikely that there will be a risk to human health if the activities are done to the piece of land.

Therefore, a detailed environmental investigation was undertaken to assess whether the identified hazardous activities have resulted in an unacceptable risk to human health.

Twenty three (23) targeted discrete soil surface samples were collected from strategic locations. The sample density was selected to enable the statistical identification of contamination 'hotspots' with a diameter of roughly 50 m to the 95% confidence limit³, which was considered appropriate given the proportions of the various potentially contaminating activities at the site and the sizes of the proposed new sections.

The samples were submitted to Hill Labs for analysis of the relevant contaminants at each location (refer to Table 5). Sample locations are displayed in Figure 2.

4.1 Data Quality Objectives

The data quality objectives (DQO) of this assessment were:

- To assess the presence and concentrations of contaminants of concern identified during the site history investigation; and
- To assess the risks to human health posed by contamination at the site.

4.2 Methodology

The following was undertaken during the soil sampling works:

- Samples were given individual names that corresponded to specific locations recorded on a site plan (refer to Figure 2);
- Visual and olfactory inspection of each sample for indicators of contamination;
- Samples were collected from the site surface to approximately 0.1 m bgl, then compressed directly into laboratory supplied containers using a new pair of nitrile gloves for each sample. Prior to sampling, the equipment (hand trowel & foot auger) was decontaminated using a triple wash procedure with potable water, Decon 90 solution and deionised water;
- Placement of samples into a chilly bin and transport, under standard IE chain of custody procedures, to Hill Labs for analysis;
- IE requested that Hills analyse samples for contaminants detailed in Table 5, consisting of a suite of heavy metals (As, Cd, Cr, Cu, Pb, Ni and Zn), organochlorine pesticides (OCPs), petroleum hydrocarbons (TPH) and / or asbestos (presence / absence).

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Table 5: Sample Names, Locations and Analytes

Sample Name	Location	Analytes
DR1	Adjacent to a stack of treated timber in the proposed road	Heavy metals
DR2	Adjacent to a stack of oil drums in proposed Lot 36	Heavy metals and TPH
DR3	Adjacent to a stack of treated timber in proposed Lot 18	Heavy metals
DR4	At the entrance to a storage shed in proposed Lot 13	
DR5	An area with ash / charcoal on proposed Lot 37	
DR6	Within the footprint of a demolished building on proposed Lot 11	
DR7	Adjacent to a few 44 gallon drums used for waste incineration on proposed Lot 10	Heavy metals
DR8	At the entrance to a workshop building in proposed Lot 8	Heavy metals and TPH
DR9	Beneath a tree in the orchard that had ash spread around the trunk in proposed Lot 5	Heavy metals and OCPs
DR10	Near to a demolished building on proposed Lot 12	Asbestos presence / absence
DR11	Near to a demolished building on proposed Lot 11	
DR12	Within the footprint of a demolished shed on proposed Lot 38	Heavy metals and TPH
DR13	Surface of proposed Lot 35	Heavy metals
DR14	Surface of proposed Lot 33	
DR15	Adjacent to a disused concrete pad in the proposed road	
DR16	On a border dyke within proposed Lot 19	
DR17	An area of disturbed soil in the northern corner of proposed Lot 25	
DR18	A former vehicle dismantling wrecked vehicle parking area in proposed Lot 21	Heavy metals
DR19	A former vehicle dismantling wrecked vehicle parking area in proposed Lot 20	
DR20	A former vehicle dismantling wrecked vehicle parking area in proposed Lot 16	
DR21	Black-stained soil in proposed Lot 18	Heavy metals and TPH
DR22	A former vehicle dismantling wrecked vehicle parking area in proposed Lot 15	Heavy metals
DR23	Beneath a tree in the orchard in proposed Lot 4	

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

4.2.1 Quality Assurance / Quality Control

The quality assurance / quality control (QA / QC) procedures employed during the works included:

- Standard sample registers and chain of custody records have been kept for all samples;
- The use of Hills, accredited by International Accreditation New Zealand (IANZ), to conduct laboratory analyses; and
- During the site investigation every attempt was made to ensure that cross contamination did not occur through the use of the procedures outlined within this document.

4.3 Investigation Criteria

4.3.1 Soil Criteria

The investigation criteria referenced in this report have been selected from the NES to assess risks to human health. Where a soil contaminant standard (SCS) was not available, the hierarchy detailed in the MfE *Contaminated Land Management Guidelines No. 2: Hierarchy and Application in New Zealand of Environmental Guideline Values*¹⁵ was used to select applicable criteria.

SCSs, or other appropriate criteria for residential land use, with an anticipated ingestion of 10% produce grown on the site, have been selected considering the potential end use of the site.

SCSs, or other appropriate criteria for commercial / industrial use have also been presented to assess the risks to human health during the disturbance of soil associated with installation and maintenance of underground services and other construction works required as part of the site development.

Landcare Research produced a report¹⁶ on naturally occurring (referred to as background) concentrations of heavy metals in New Zealand. Naturally occurring concentrations were correlated with geological units to enable estimation of the mean and 95% upper confidence limits (UCL) of selected heavy metals. Laboratory results below the 95% UCL estimates for the geological unit described as 'gravel' are considered to qualify as 'cleanfill' according to the MfE definition¹⁷.

4.4 Results

4.4.1 Soil Encountered

Near surface soil encountered across the majority of the site was described as brown gravelly silt. Soil was stained black in areas where oil spills were noted.

4.4.2 Laboratory Test Results

Table 6 compares soil contaminant concentrations in the samples with the adopted investigation criteria described in Section 4.2.1. The full analytical results are included in Appendix 4.

Table 6: Laboratory Results Compared with Human Health Criteria

Analyte	Investigation Criteria			Investigation Results																							
	Land Use	Predicted Background Concentrations	Human Health SCs ^A	DR1	DR2	DR3	DR4	DR5	DR6	DR7	DR8	DR9	DR10	DR11	DR12	DR13	DR14	DR15	DR16	DR17	DR18	DR19	DR20	DR21	DR22	DR23	
			Residential																								Commercial / Industrial and Maintenance / Excavation
Heavy Metals																											
Arsenic	12.06	20	70	67	7	15	10	8	13	5	11	10	-	-	8	6	5	7	7	4	7	10	158	12	11	6	
Cadmium ^C	0.34	3	1,300	< 0.10	< 0.10	< 0.10	0.17	0.2	0.14	0.15	0.72	0.12	-	-	0.19	< 0.10	< 0.10	< 0.10	0.18	0.12	0.43	0.16	< 0.10	< 0.10	0.24		
Chromium ^D	80.15	460	6,300	18	5	8	6	9	10	20	38	7	-	-	8	5	5	5	7	3	6	9	72	12	9	7	
Copper	42.85	10,000	>10,000	30	9	16	18	155	19	10	700	18	-	-	91	69	10	22	23	11	16	59	220	25	16	18	
Lead	44.34	210	3,300	24	12.8	43	20	100	45	19.5	418	41	-	-	46	21	10.4	12.3	47	9.7	60	124	128	34	28	28	
Nickel	44.96	400 ^E	6,000 ^F	8	7	9	7	7	6	12	13	6	-	-	6	6	6	6	8	4	6	9	7	8	7	7	
Zinc	182.8	7,400 ^G	400,000 ^H	82	73	77	82	230	94	103	470	74	-	-	124	62	34	44	84	50	66	240	550	3,700	74	85	
Total Petroleum Hydrocarbons^I																											
C ₁ - C ₆	ND	500 ^{F, m}	500 ^{F, m}	-	81	-	-	-	-	-	< 20	-	-	-	-	-	-	-	-	-	-	-	-	-	27	-	-
C ₁₀ - C ₁₄	ND	510 ^{F, n}	1,700 ^{F, n} (31,000 ^{F, n})	-	1,649	-	-	-	-	-	< 20	-	-	-	25	-	-	-	-	-	-	-	-	-	186	-	-
C ₁₅ - C ₂₁	ND	>20,000 ^F	>20,000 ^F	-	9,109	-	-	-	-	-	9,809	-	-	-	9,609	-	-	-	-	-	-	-	-	-	26,009	-	-
Asbestos																											
Presence / Absence	ND	ND	ND	-	-	-	-	-	-	-	-	-	-	ND	ND	-	-	-	-	-	-	-	-	-	-	-	-
Organochlorine Pesticides																											
Total DDT Isomers	ND	70	1,000	-	-	-	-	-	-	-	-	-	< 0.07	-	-	-	-	-	-	-	-	-	-	-	-	-	-
p,p'-DDE	ND	NA	NA	-	-	-	-	-	-	-	-	-	0.012	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes:
 All values in mg/kg. Full laboratory results are provided in Hill Laboratories Certificate.
Bold text indicates that the concentration exceeds the Residential criterion
Italics text indicates concentration exceeds the Commercial / Industrial and Maintenance / Excavation Criterion.
Underlined text indicates concentration exceeds the estimated background concentration (grave)
 ND Indicates that the contaminant is not detected within the laboratory limits of detection.
 - Indicates that the tests was not completed on the sample.
 NA Indicates that the criterion has not been established.

A - The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health
 B - Australian National Environmental Protection Council (NPEC) National Environmental Protection (Assessment of Site Contamination) Measure Schedule B(1) Guideline on the investigation levels for soil and groundwater
 C - Assesses soil pH of 5.
 D - Criteria for C₆ presented as criteria for C₄ are non limiting.
 E - MIE Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand. Module 4 – Tier 1 Soil Screening Criteria
 F - Guideline values adopted conservatively for sandy silt surface (<1m) soils.
 G - Value exceeds the threshold likely to correspond to formation of separate phase hydrocarbons.
 H - Estimated criteria exceeds 20,000 mg/kg. At 20,000 mg/kg residual separate phase is expected to have formed in soil matrix and some aesthetic impact may be noted.
 I - Value is specifically for maintenance / excavation activities.
 Limiting pathway^F for each Petroleum Hydrocarbon criterion:
 x - PAH surrogate
 m - Maintenance / Excavation

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

4.5 Discussion

4.5.1 Photographic and Anecdotal Evidence

The evidence observed in historical photographs is generally consistent with anecdotal evidence provided by Mr Symons. Buildings used for raising poultry had been present in the area north east of the dwelling, but they were demolished between 1979 and the mid-to-late 1980s.

4.5.2 129 Gilligans Gully Road

No potentially contaminating activities were found to have occurred in that part of the site and the area is considered unlikely to have been impacted by contamination.

4.5.3 Orchard Area

The hobby sized orchard area, located north west of the dwelling, contains 27 trees. A small amount of ash / charcoal, which was considered to be a potential source of heavy metals and polycyclic aromatic hydrocarbons (PAHs), was observed at the base of a few trees.

Laboratory results (sample DR9) indicate that the heavy metals concentrations were below the naturally occurring levels¹⁶. The sample was not tested for PAHs due to the small scale of the ash / charcoal application. However, the area can be assumed to be impacted above the naturally occurring PAH concentrations, which is considered to be zero for the site location.

A daughter product, resulting from the chemical breakdown of DDT, was detected in sample (DR9). However, the concentration was so low that it was barely above the laboratory detection level (0.012 mg/kg).

Soil from the orchard area is therefore not considered to qualify as cleanfill¹⁷.

4.5.4 Former Poultry Buildings

Four buildings had been present on site, in addition to the dwelling, during the period between 1958 and the mid-to-late 1980s. The buildings were reportedly constructed with timber frames clad with corrugated iron (John Symons, *pers. comm.*). Electric heat was used as an alternative to solid or liquid fuel heating. It was considered possible that asbestos-containing materials could have been used in parts of the buildings, but no asbestos was detected in the samples taken from the areas near to the former building footprints.

It was also considered possible that OCPs were used to control invertebrate pests in the poultry buildings. It was considered likely that, if OCPs had been used, then OCPs would have been used on the fruit trees and orchard area in general.

The laboratory result for DR9, collected from the orchard area, contained a small amount of degraded DDT which suggests that any DDT used during the poultry farming period has undergone natural attenuation to the point where the concentrations are not considered likely to pose a risk to human health or the environment.

Furthermore, no asbestos was detected in the vicinity of the former poultry buildings.

4.5.5 Buried Waste

John Symes (*pers. comm.*) indicated that domestic waste was burned and buried on the site for several years prior to commencement of the CODC refuse collection service.

A geophysical survey, using ground penetrating radar (GPR) was undertaken in 2022 to identify areas where waste could have been buried. A spade was used to excavate in the areas where the GPR suggested that the ground had been disturbed, however nothing of anthropogenic origin was found

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

within the upper 0.5 m of the site surface. It is considered possible that buried waste could be uncovered in isolated areas during the subdivision development earthworks.

4.5.6 Treated Timber

Samples collected from areas where treated timber had been stored (DR1 and DR3) were found to contain elevated concentrations of arsenic. The concentration of arsenic in DR1 exceeds the residential SCS and is estimated to cover an area of approximately 4 m x 2 m x 0.2 m for a total estimated volume of 1.6 m³.

Treated timber posts were also observed as parts of fences on the site. The contamination impacts resulting from the leaching of arsenic, copper and chromium from treated timber fence posts has been well studied^{20, 21} and a small volume of soil is considered to contain these contaminants at concentrations that exceed the SCSs within approximately 300 mm of each post. The impacts extend to depths ranging between 600 mm and 800 mm below ground level (bgl). The total volume of impacted soil from these sources is estimated to be less than 5 m³.

4.5.7 Oil Stains

Black-stained soil was encountered in four locations (DR2, DR8, DR12 and DR21). Laboratory results confirmed that medium length (C10-C14) hydrocarbons and long chain (C15 to C36) hydrocarbons exceed the relevant human health criteria in samples DR2 and DR21.

The estimated volumes of impacted soil are 1 m³ at the location of DR2, 2 m³ at the location of DR8 and 0.2 m³ at the location of DR21.

5 Conceptual Site Model

A contamination conceptual site model, presented in Table 5, consists of three primary components to allow the potential for risk to be determined. These are:

- Source of contamination;
- Pathway to allow the contamination to mobilise; and
- Sensitive receptors which may be impacted by the contamination.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Table 5: Conceptual Site Model

Source	Pathway	Receptor
Heavy metals Organochlorine pesticides TPH PAHs Asbestos	Inhalation of dust Dermal absorption (direct contact) Ingestion of soil and / or produce grown in the soil	Maintenance / Excavation workers Site construction workers Current / future residents and visitors
Acceptable risk to human health	<p style="text-align: center;">Residential use</p> <p>No: Isolated areas contain contaminants that pose risks to human health. Remediation of those areas is required to enable residential use</p> <p style="text-align: center;">Earthworks associated with land development</p> <p>Yes: Evidence gathered in this investigation indicates that the majority of the site contains contaminant concentrations below the SCSs to protect worker health. Sample DR20 contains a concentration of arsenic that exceeds the SCS for excavation / earthworks activities and therefore additional controls must be implemented to protect worker health during excavation works in that part of the site.</p>	

6 Conclusions

Information obtained as part of this investigation (refer to Section 3) indicates that, prior to use of the site as a poultry farm, the majority of 155 Dunstan Road has been used to store various building materials, for the wrecking and maintenance of vehicles, as well as for burning of unknown materials and disposal of waste in refuse pits.

No evidence of potentially contaminating activities could be found for the proposed subdivision of 129 Gilligans Gully Road.

Orchard Area

A daughter product, resulting from of the chemical breakdown of DDT, was detected in sample (DR9) located in the orchard area north west of the dwelling. However, the concentration was so low that it was barely above the laboratory detection level (0.012 mg/kg). However, due to the presence of ash / charcoal and the detection of 4,4'-DDE, soil from the orchard area cannot be considered to qualify for use as cleanfill¹⁷.

Former Poultry Buildings

The laboratory result for DR9, collected from the orchard area, contained a small amount of degraded DDT which suggests that any DDT used during the poultry farming period has undergone natural attenuation to the point where the concentrations are not considered likely to pose a risk to human health or the environment. Furthermore, no asbestos was detected in the vicinity of the former poultry buildings.

Impacts from heavy metals were found in samples DR3, DR5 and DR6, which are considered to represent portions of the extents of the former poultry buildings. Soil from those areas cannot be considered to qualify for use as cleanfill.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

Buried Waste

A spade was used to excavate in the areas where a GPR survey suggested that the ground had been disturbed, however nothing of anthropogenic origin was found within the upper 0.5 m of the site surface. It is considered possible that buried waste could be uncovered in isolated areas during the subdivision development earthworks.

Treated Timber

The concentration of arsenic in DR1 (57 mg/kg), where treated timber posts were stored in a stack, exceeds the residential SCS (20 mg/kg).

Treated timber posts were also observed as parts of fences on the site. Contamination impacts resulting from the leaching of arsenic, copper and chromium from treated timber fence posts has been well studied^{20, 21} and a small volume of soil is considered to contain these contaminants at concentrations that exceed the SCSs within approximately 300 mm of each post. The impacts extend to depths ranging between 600 mm and 800 mm below ground level (bgl) around each post and remediation is required to enable residential use of those areas.

Oil Stains

Black-stained soil was encountered in four locations (DR2, DR8, DR12 and DR21). Laboratory results confirmed that medium length (C10-C14) hydrocarbons and long chain (C15 to C36) hydrocarbons exceed the relevant human health criteria in samples DR2 and DR21.

Soil from all four locations cannot be considered to qualify for use as cleanfill.

Estimated Volume of Impacted Soil

The total volume of soil that is estimated to be impacted with contaminant concentrations exceeding the residential SCSs is approximately 10 m³. This is made up of 1.6 m³ at the location of DR1, 1 m³ at the location of DR2, 2 m³ at the location of DR8, 0.2 m³ at the location of DR21 and up to 5 m³ from the areas surrounding timber fence posts.

Based on the current contamination status of the site, given the contamination sources identified, it is considered highly unlikely that there will be a risk to human health, if the following activities are done to the piece of land:

- A Contaminated Site Management Plan should be prepared as part of a Remediation Action Plan to control exposure to sources of contamination and to enable the remediation of the impacted areas.
- Subdividing the land;
- Developing the new properties for residential use; and
- Future occupation of the new residential dwellings.

7 Recommendations

It is recommended that the proposed subdivision is allowed as a Restricted Discretionary Activity under NES Regulation 10 because a detailed site investigation exists and it states that the soil contamination exceeds the applicable standard in Regulation 7.

The following are recommended to be developed as conditions of consent:

- A remediation options assessment should be completed to evaluate methods that would eliminate the risks to health from the identified sources of contamination.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

- A remediation action plan (RAP) and contaminated site management plan (CSMP) should be prepared to ensure that the potential risks to health are mitigated during and after implementation of the remedial strategy.
- If any material showing signs of potential contamination (visual or olfactory) is unearthed on any parts of the site during future soil disturbance events, e.g. discovery of buried waste, work should stop immediately and a suitably qualified environmental practitioner should be engaged to assess the risk to human health prior to recommencing earthworks.

Once the site has been remediated and developed for residential purposes, potential future applications for subdivision / development / disturbance of the proposed new lots should be assessed in terms of any potential additional HAIL activities that could occur within the properties at any time after remediation has been completed.

8 References

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9 Limitations

- i. We have prepared this report in accordance with the brief as provided. This report has been prepared for the use of our client, Navigate Property Limited, their professional advisers and the relevant Territorial Authorities in relation to the specified project brief described in this report. No liability is accepted for the use of any part of the report for any other purpose or by any other person or entity.
- ii. The recommendations in this report are based on the ground conditions indicated from published sources, site assessments and subsurface investigations described in this report based on accepted normal methods of site investigations. Only a limited amount of information has been collected to meet the specific financial and technical requirements of the client's brief and this report does not purport to completely describe all the site characteristics and properties. The nature and continuity of the ground between test locations has been inferred using experience and judgement and it should be appreciated that actual conditions could vary from the assumed model.
- iii. Subsurface conditions relevant to construction works should be assessed by contractors who can make their own interpretation of the factual data provided. They should perform any additional tests as necessary for their own purposes.

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

- iv. This Limitation should be read in conjunction with the IPENZ/ACENZ Standard Terms of Engagement.
- v. This report is not to be reproduced either wholly or in part without our prior written permission.

We trust that this information meets your current requirements. Please do not hesitate to contact the undersigned on 021 556 549 if you require any further information. The author is a Certified Environmental Practitioner (CEnvP) under the Environment Institute of Australia and New Zealand (EIANZ) accreditation system.

Report prepared by

Claude Midgley, CEnvP

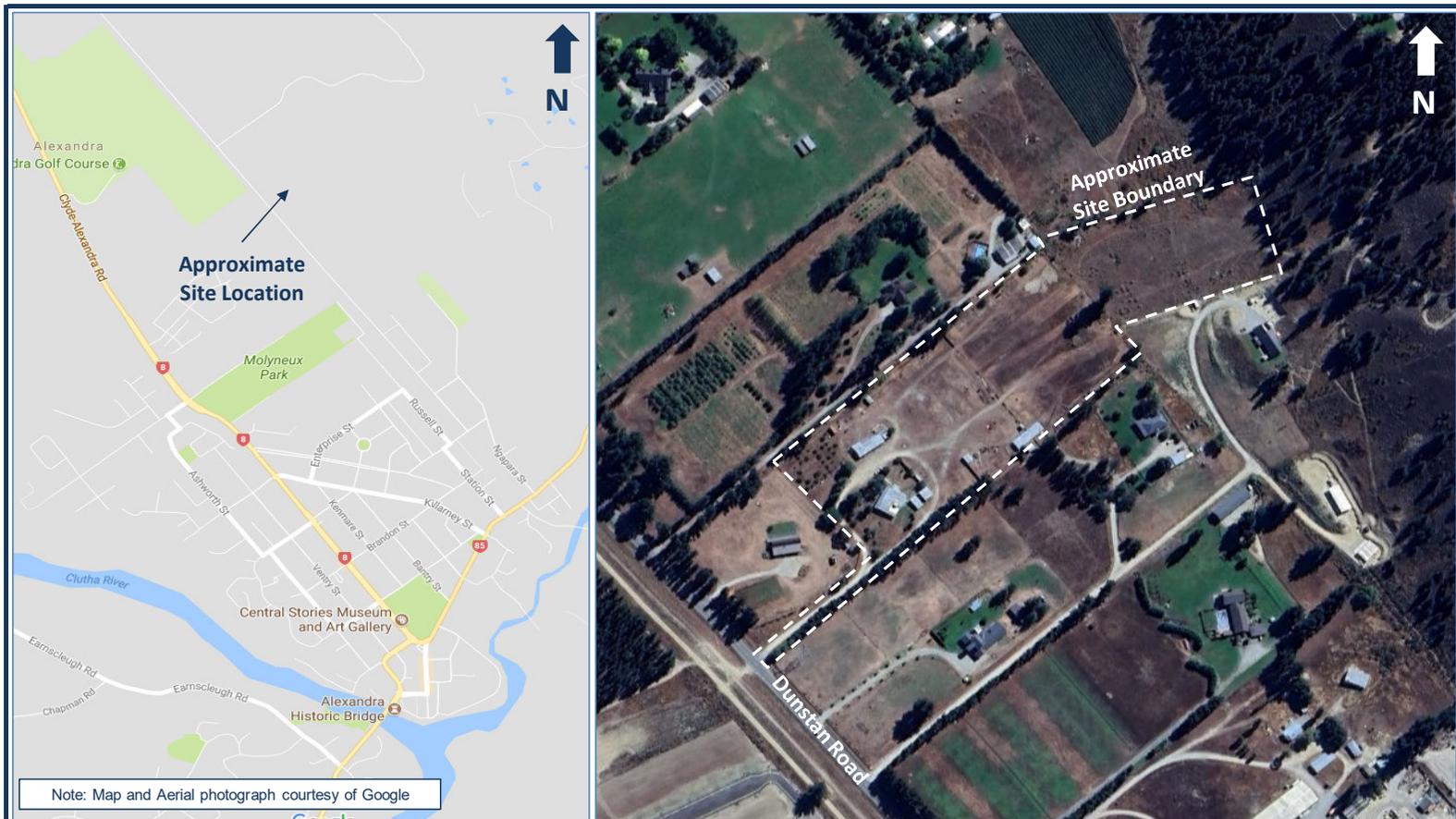
Associate Environmental Scientist



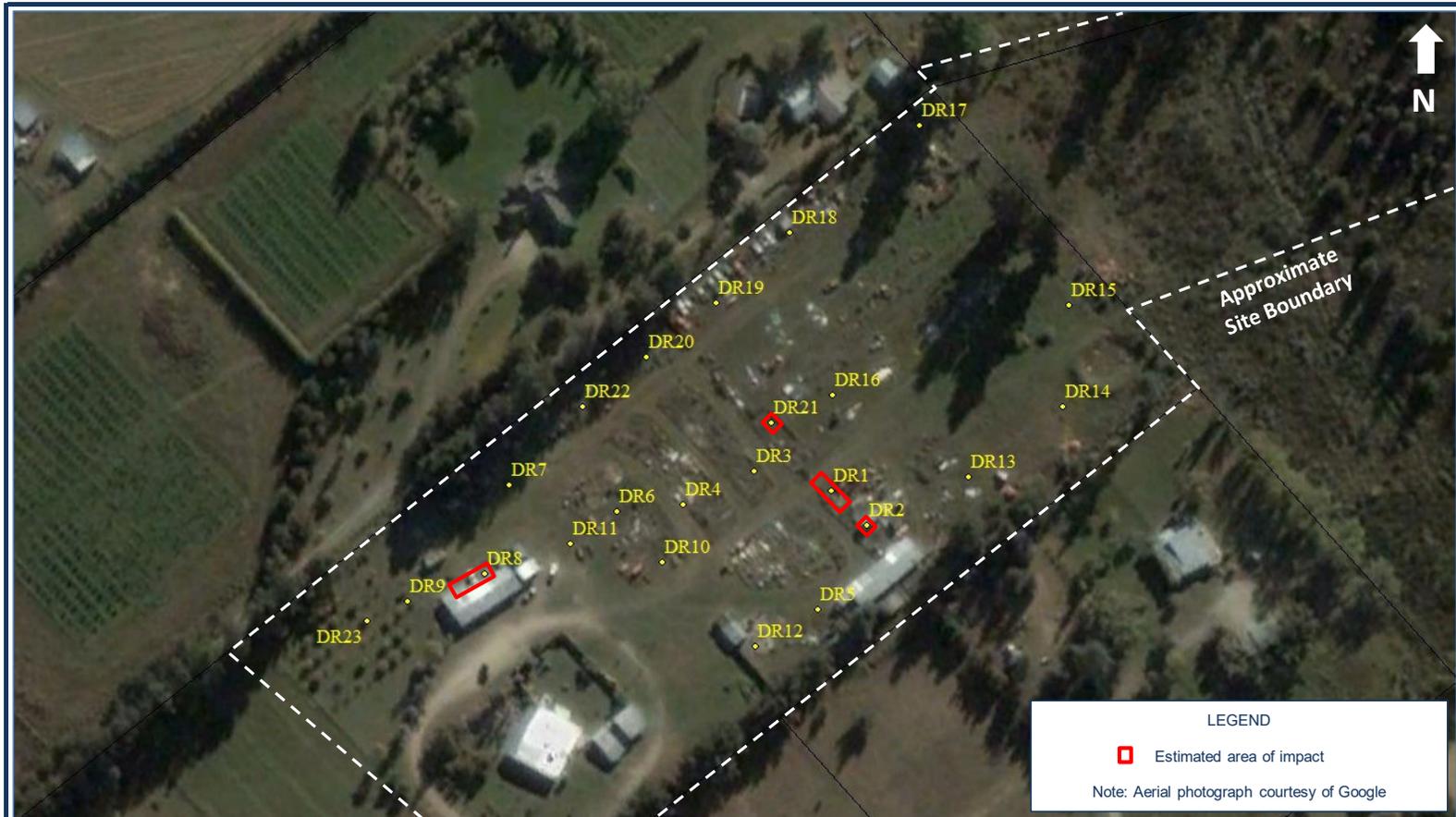
Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

APPENDIX 1

Figures



Description	Site Location Plan	Figure Number	1	
Project	Detailed Site Investigation 155 Dunstan Road, Alexandra	Date	Oct-23	
Client	Navigate Property Limited	Drawn by	CM	
Project Number	23036	Approved by	JK	



Description	Sample Location Plan	Figure Number	2	
Project	Detailed Site Investigation 155 Dunstan Road, Alexandra	Date	Oct-23	
Client	Navigate Property Limited	Drawn by	CM	
Project Number	23036	Approved by	JK	

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

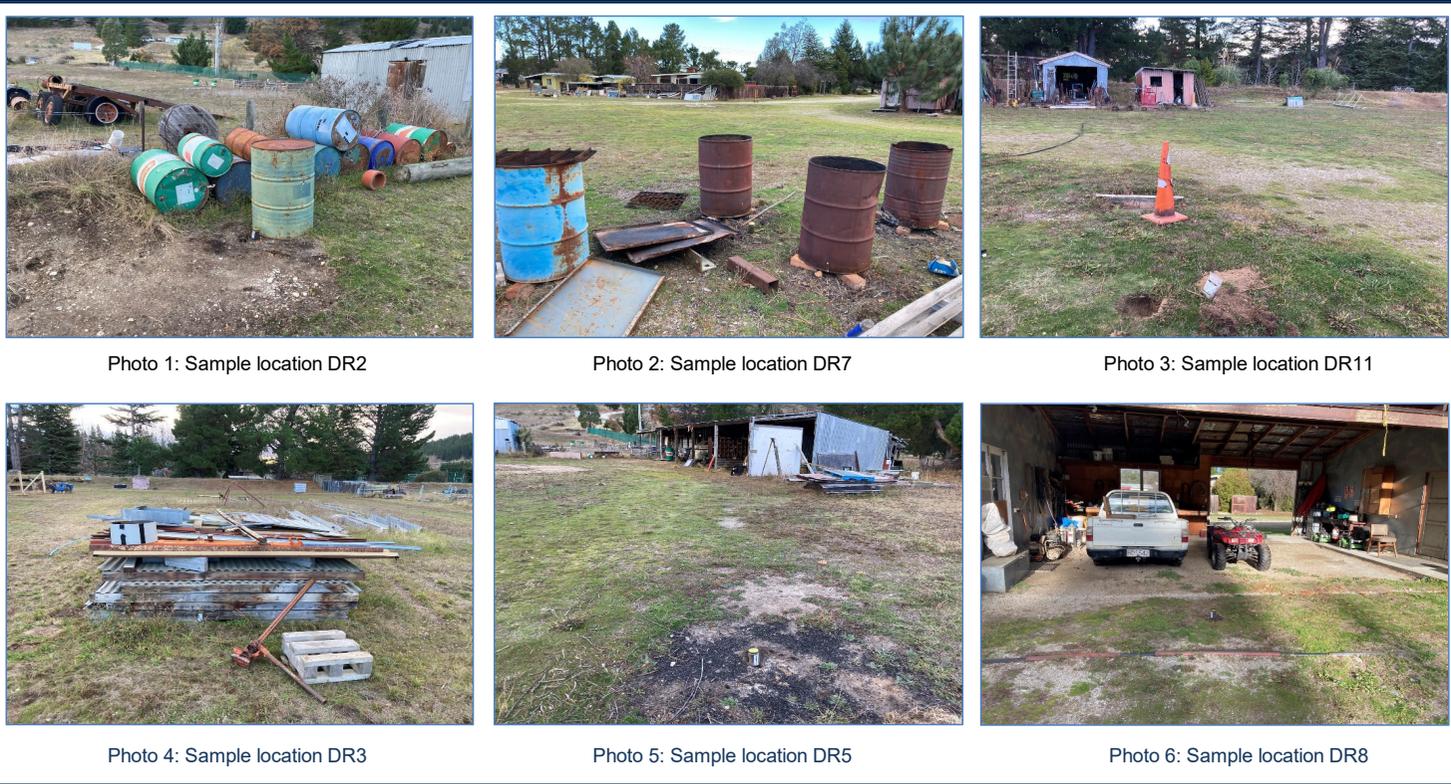
APPENDIX 2

Proposed Subdivision Plan

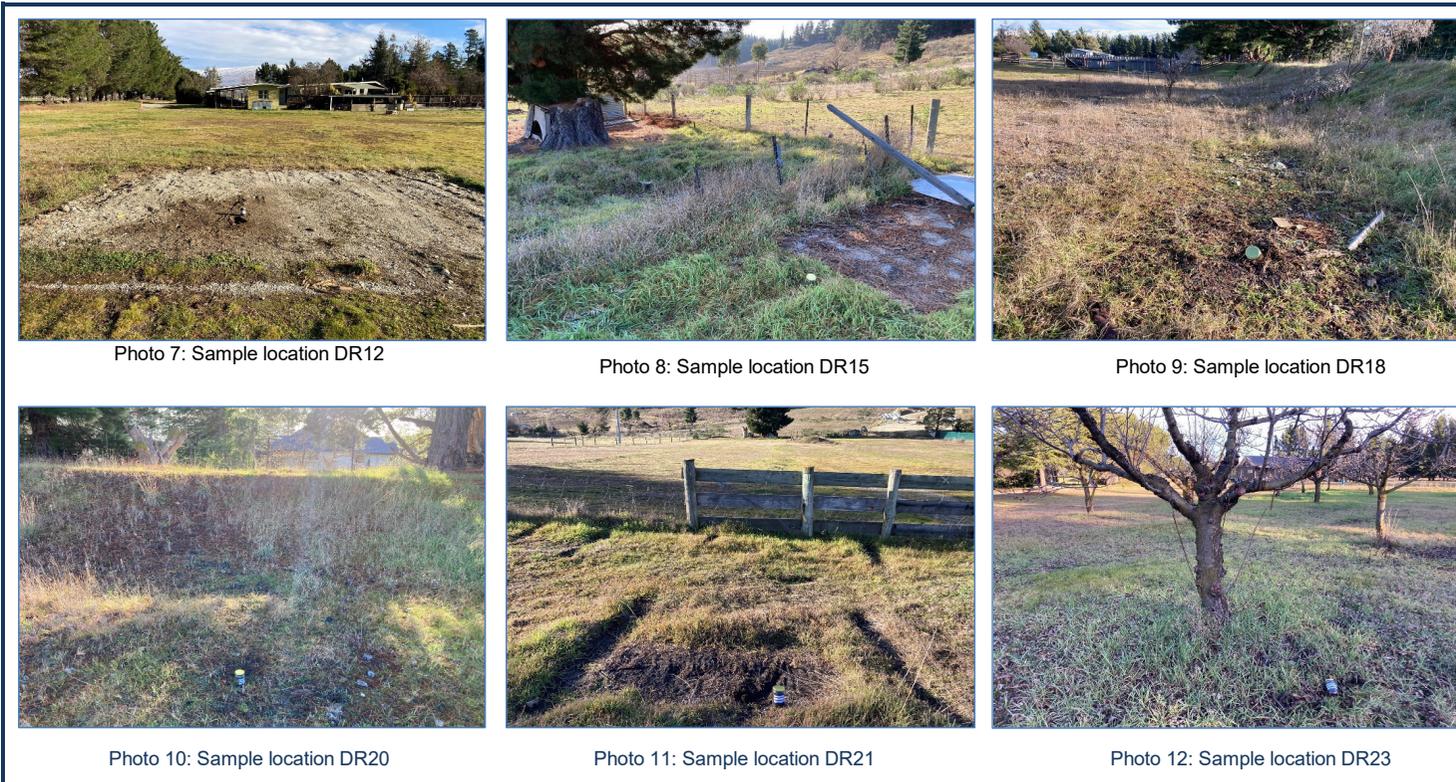
Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

APPENDIX 3

Site Photographs



Description	Site Photographs	Photos	1 to 6	
Project	Detailed Site Investigation 155 Dunstan Road, Alexandra	Date Taken	7/06/22	
Client	Navigate Property Limited	Taken by	CM	
Project Number	23036	Approved by	JK	



Description	Site Photographs	Photos	7 to 12	
Project	Detailed Site Investigation 155 Dunstan Road, Alexandra	Date Taken	7/07/23	
Client	Navigate Property Limited	Taken by	CM	
Project Number	23036	Approved by	JK	

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

APPENDIX 4

CODC NES Records Search



NES RECORD SEARCH

Application

JKCM Limited PO Box 456, Cromwell 9342	Number Application date Phone Mobile Email jana@insighteng.co.nz	NES230029 25/07/23 021 202 1747
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Property

Valuation No.	2853159703
Location	155 Dunstan Road, Alexandra
Legal Description	LOT 2 DP 581459
Area (hectares)	3.1165

Resource consents

Resource Area: The site is within the Rural Resource Area of the Central Otago District Plan.

Consents:

- 23/08/22 RESOURCE CONSENT 220249** : Controlled activity boundary adjustment in the rural resource area.
Information provided with this consent references a previous Primary Site investigation that identifies the following HAIL activities on site that may trigger NESCS requirements: A11, A17, A18, D5, F4, G4 and G5.
- 22/11/17 RESOURCE CONSENT 170457**: Change of resource consent condition in relation to RC170326
No information in relation to HAIL activities could be found on this record.
- 10/10/17 RESOURCE CONSENT 170326**: Subdivision consent for undertake a 2 lot rural subdivision with proposed lot areas of 0.96ha and 3.17ha. The site is subject to high voltage line hazard.
Information provided with this consent includes a Primary Site investigation that identifies the following HAIL activities on site that may trigger NESCS requirements: A11, A17, A18, D5, F4, G4 and G5.
- 26/11/07 RESOURCE CONSENT E080012**: Stockpiling of materials at property on Dunstan Road
Information on this record indicates stockpiling of unidentified material(s). This stockpile may include a range or sources/materials some of which may trigger NESCS requirements
- 07/06/06 RESOURCE CONSENT E060064**: Stockpiling of materials
Information on this record indicates stockpiling of unidentified material(s). This stockpile may include a range or sources/materials some of which may trigger

NESCS requirements

Building**Consents/Permits/Compliance Schedules:**

- | | |
|-------------------|--|
| 1/04/09 | BUILDING CONSENT 090178 : Install a new fire appliance
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 16/03/1984 | BUILDING PERMIT 2624 : House alterations and additions to shed
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 10/10/1979 | BUILDING PERMIT 2056 : Addition to house
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 5/08/1975 | BUILDING PERMIT 1416 : Additions to house
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 12/03/1965 | BUILDING PERMIT B000041 : Erect wheat silo
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 6/06/1963 | BUILDING PERMIT A011881 : Erect 2 brooder sheds
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 3/05/1962 | BUILDING PERMIT 116711 : Addition to kitchen
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 3/05/1962 | BUILDING PERMIT 116710 : Erect hen house
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 10/07/1961 | BUILDING PERMIT 116570 : Erect egg room & cooler
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 29/05/1961 | BUILDING PERMIT 96 : Additions to existing drains - septic tank, flush toilet & drainage plan on file.
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 14/04/1961 | BUILDING PERMIT 54490 : Erect breeding sheds
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 3/10/1960 | BUILDING PERMIT 54397 : Erect cage laying shed
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 11/03/1960 | BUILDING PERMIT 1164 : Erect hen house
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 2/10/1958 | BUILDING PERMIT 937 : Additions to sitting room
<i>No information in relation to HAIL activities could be found on this record.</i> |
| 12/11/1951 | BUILDING PERMIT 329 : Erect new henhouses
<i>No information in relation to HAIL activities could be found on this record.</i> |

Preliminary Site Investigations and Detailed Site Investigations

31/08/2017 Preliminary Site Investigation: This PSI identified numerous HAIL and potential HAIL activities on site. These were A11 pest control, A17 storage tanks or drums for diesel, A18 wood treatment or perseveration, D5 engineering workshops with metal fabrication, F4 motor vehicle workshops, G4 scrap yards including automotive dismantling, wrecking or scrap metal yards and G5 waste disposal to land. The PSI has concluded that the disturbance of soil on Lot 2 DP 581459 may pose a risk to human health if soil is disturbed or ingested from produce grown in the potentially impacted soil. The PSI concludes further investigation and due diligence would be needed regarding the potential soil contamination on Lot 2 DP 581459.

Aerial Photographs



Figure One: Council Aerial Photographs from 2003 to 2019 show evidence or association with of all HAIL items identified in the PSI dated 31/04/2017. These items are noted as A11 pest control associated with a poultry farm, A17 storage tanks or drums for diesel, A18 wood treatment or perseveration, D5 engineering workshops with metal fabrication, F4 motor vehicle workshops, G4 scrap yards including automotive dismantling, wrecking or scrap metal yards and G5 waste disposal to land associated with a poultry farm. The listed HAIL items above may trigger NESCS requirements.

Disclaimer: The Council does not hold records directly relating to activities on the Hazardous Activities and Industries List (HAIL). In the event some information is available it cannot be guaranteed as correct or complete and therefore may not satisfy your request. We therefore recommend you undertake further investigation to determine whether any HAIL activities exist on the site.

Rachel Stanton
Project Information Memorandum Officer
Date: 23 August 2023

Reviewed by:

Adam Vincent
Planning Officer
Date: 23 August 2023

Detailed Environmental Site Investigation – 155 Dunstan Road, Alexandra

APPENDIX 5

Laboratory Results Certificates and Chain of Custody Documentation



Hill Laboratories
TRIED, TESTED AND TRUSTED

R J Hill Laboratories Limited
28 Duke Street Frankton 3204
Private Bag 3205
Hamilton 3240 New Zealand

T 0508 HILL LAB (44 555 22)
T +64 7 858 2000
E mail@hill-labs.co.nz
W www.hill-laboratories.com

Certificate of Analysis

Page 1 of 4

Client:	Insight Engineering	Lab No:	3010068	SPv2
Contact:	Claude Midgley C/- Insight Engineering PO Box 456 Cromwell 9384	Date Received:	09-Jun-2022	
		Date Reported:	14-Jun-2022	
		Quote No:	100740	
		Order No:		
		Client Reference:	22028	
		Submitted By:	Claude Midgley	

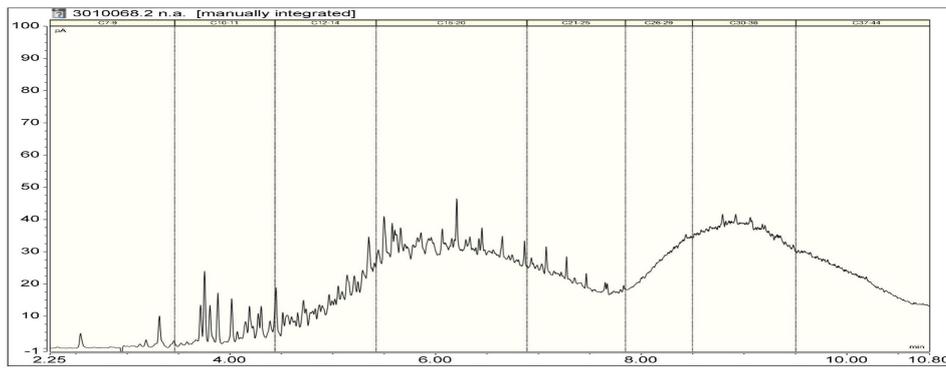
Sample Type: Soil					
Sample Name:	DR1	DR2	DR3	DR4	DR5
Lab Number:	3010068.1	3010068.2	3010068.3	3010068.4	3010068.5
Individual Tests					
Dry Matter	g/100g as rcvd	-	92	-	-
Heavy Metals, Screen Level					
Total Recoverable Arsenic	mg/kg dry wt	57	7	15	10
Total Recoverable Cadmium	mg/kg dry wt	< 0.10	< 0.10	< 0.10	0.17
Total Recoverable Chromium	mg/kg dry wt	18	5	8	6
Total Recoverable Copper	mg/kg dry wt	30	9	16	18
Total Recoverable Lead	mg/kg dry wt	24	12.8	43	20
Total Recoverable Nickel	mg/kg dry wt	8	7	9	7
Total Recoverable Zinc	mg/kg dry wt	82	73	77	82
Total Petroleum Hydrocarbons in Soil					
C7 - C9	mg/kg dry wt	-	81	-	-
C10 - C14	mg/kg dry wt	-	1,640	-	-
C15 - C36	mg/kg dry wt	-	9,100	-	-
Total hydrocarbons (C7 - C36)	mg/kg dry wt	-	10,800	-	-
Sample Name:	DR6	DR7	DR8	DR9	
Lab Number:	3010068.6	3010068.7	3010068.8	3010068.9	
Individual Tests					
Dry Matter	g/100g as rcvd	-	97	90	94
Heavy Metals, Screen Level					
Total Recoverable Arsenic	mg/kg dry wt	13	5	11	10
Total Recoverable Cadmium	mg/kg dry wt	0.14	0.15	0.77	0.12
Total Recoverable Chromium	mg/kg dry wt	10	20	38	7
Total Recoverable Copper	mg/kg dry wt	19	10	700	18
Total Recoverable Lead	mg/kg dry wt	45	19.5	410	41
Total Recoverable Nickel	mg/kg dry wt	6	12	13	6
Total Recoverable Zinc	mg/kg dry wt	94	103	470	74
Organochlorine Pesticides Screening in Soil					
Aldrin	mg/kg dry wt	-	< 0.011	-	< 0.011
alpha-BHC	mg/kg dry wt	-	< 0.011	-	< 0.011
beta-BHC	mg/kg dry wt	-	< 0.011	-	< 0.011
delta-BHC	mg/kg dry wt	-	< 0.011	-	< 0.011
gamma-BHC (Lindane)	mg/kg dry wt	-	< 0.011	-	< 0.011
cis-Chlordane	mg/kg dry wt	-	< 0.011	-	< 0.011
trans-Chlordane	mg/kg dry wt	-	< 0.011	-	< 0.011
2,4'-DDD	mg/kg dry wt	-	< 0.011	-	< 0.011
4,4'-DDD	mg/kg dry wt	-	< 0.011	-	< 0.011
2,4'-DDE	mg/kg dry wt	-	< 0.011	-	< 0.011



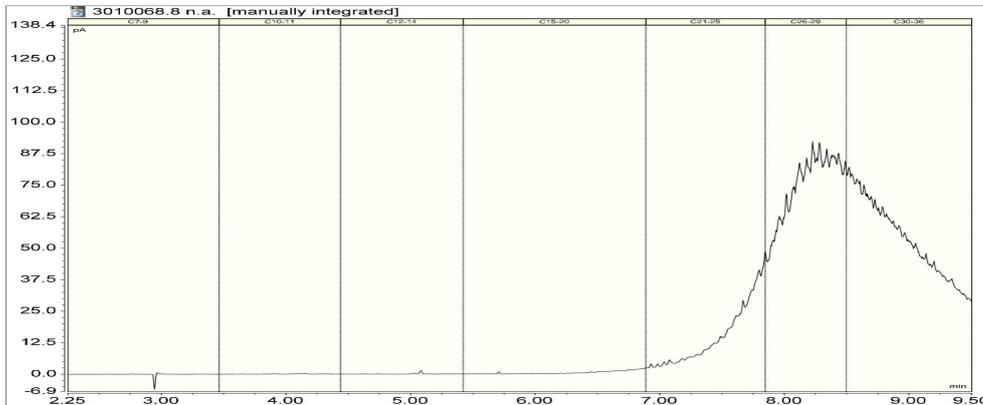
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Sample Type: Soil						
Sample Name:		DR6	DR7	DR8	DR9	
Lab Number:		3010068.6	3010068.7	3010068.8	3010068.9	
Organochlorine Pesticides Screening in Soil						
4,4'-DDE	mg/kg dry wt	-	< 0.011	-	0.012	-
2,4'-DDT	mg/kg dry wt	-	< 0.011	-	< 0.011	-
4,4'-DDT	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Total DDT Isomers	mg/kg dry wt	-	< 0.07	-	< 0.07	-
Dieldrin	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Endosulfan I	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Endosulfan II	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Endosulfan sulphate	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Endrin	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Endrin aldehyde	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Endrin ketone	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Heptachlor	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Heptachlor epoxide	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Hexachlorobenzene	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Methoxychlor	mg/kg dry wt	-	< 0.011	-	< 0.011	-
Total Petroleum Hydrocarbons in Soil						
C7 - C9	mg/kg dry wt	-	-	< 20	-	-
C10 - C14	mg/kg dry wt	-	-	< 20	-	-
C15 - C36	mg/kg dry wt	-	-	8,800	-	-
Total hydrocarbons (C7 - C36)	mg/kg dry wt	-	-	8,800	-	-

3010068.2
 DR2
 Client Chromatogram for TPH by FID



3010068.8
DR8
Client Chromatogram for TPH by FID



Summary of Methods

The following table(s) gives a brief description of the methods used to conduct the analyses for this job. The detection limits given below are those attainable in a relatively simple matrix. Detection limits may be higher for individual samples should insufficient sample be available, or if the matrix requires that dilutions be performed during analysis. A detection limit range indicates the lowest and highest detection limits in the associated suite of analytes. A full listing of compounds and detection limits are available from the laboratory upon request. Unless otherwise indicated, analyses were performed at Hill Laboratories, 28 Duke Street, Frankton, Hamilton 3204.

Sample Type: Soil			
Test	Method Description	Default Detection Limit	Sample No
Individual Tests			
Environmental Solids Sample Drying*	Air dried at 35°C Used for sample preparation. May contain a residual moisture content of 2-5%.	-	1-9
Dry Matter (Env)	Dried at 103°C for 4-22hr (removes 3-5% more water than air dry) , gravimetry. (Free water removed before analysis, non-soil objects such as sticks, leaves, grass and stones also removed). US EPA 3550.	0.10 g/100g as rcvd	2, 7-9
Heavy Metals, Screen Level	Dried sample, < 2mm fraction. Nitric/Hydrochloric acid digestion US EPA 200.2. Complies with NES Regulations. ICP-MS screen level, interference removal by Kinetic Energy Discrimination if required.	0.10 - 4 mg/kg dry wt	1-9
Organochlorine Pesticides Screening in Soil	Sonication extraction, GC-ECD analysis. Tested on as received sample. In-house based on US EPA 8081.	0.010 - 0.06 mg/kg dry wt	7, 9
Total Petroleum Hydrocarbons in Soil			
Client Chromatogram for TPH by FID	Small peaks associated with QC compounds may be visible in chromatograms with low TPH concentrations. QC peaks are as follows: one peak in the C12 - 14 band, the C21 - 25 band and the C30 - 36 band. All QC peaks are corrected for in the reported TPH concentrations.	-	2, 8
C7 - C9	Solvent extraction, GC-FID analysis. In-house based on US EPA 8015.	20 mg/kg dry wt	2, 8
C10 - C14	Solvent extraction, GC-FID analysis. Tested on as received sample. In-house based on US EPA 8015.	20 mg/kg dry wt	2, 8
C15 - C36	Solvent extraction, GC-FID analysis. Tested on as received sample. In-house based on US EPA 8015.	40 mg/kg dry wt	2, 8
Total hydrocarbons (C7 - C36)	Calculation: Sum of carbon bands from C7 to C36. In-house based on US EPA 8015.	70 mg/kg dry wt	2, 8

These samples were collected by yourselves (or your agent) and analysed as received at the laboratory.

Testing was completed between 13-Jun-2022 and 14-Jun-2022. For completion dates of individual analyses please contact the laboratory.

Samples are held at the laboratory after reporting for a length of time based on the stability of the samples and analytes being tested (considering any preservation used), and the storage space available. Once the storage period is completed, the samples are discarded unless otherwise agreed with the customer. Extended storage times may incur additional charges.

This certificate of analysis must not be reproduced, except in full, without the written consent of the signatory.



Ara Heron BSc (Tech)
Client Services Manager - Environmental



Hill Laboratories
TRIED, TESTED AND TRUSTED

R J Hill Laboratories Limited
Ground Fl, 28 Heather Street
Parnell
Auckland 1052 New Zealand

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E mail@hill-labs.co.nz
W www.hill-laboratories.com

Certificate of Analysis

Page 1 of 2

Client: Insight Engineering	Lab No: 3009705	A2Pv1
Contact: Claude Midgley	Date Received: 09-Jun-2022	
C/- Insight Engineering	Date Reported: 14-Jun-2022	
PO Box 456	Quote No: 100740	
Cromwell 9384	Order No:	
	Client Reference: 22028	
	Add. Client Ref: Sampled 7/6/22	
	Submitted By: Claude Midgley	

Sample Type: Soil

Sample Name	Lab Number	As Received Weight (g)	Dry Weight (g)	<2mm Subsample Weight* (g dry wt)	Asbestos Presence / Absence	Description of Asbestos Form
DR10	3009705.1	141.6	135.5	51.7	Asbestos NOT detected.	-
DR11	3009705.2	230.2	223.1	51.2	Asbestos NOT detected.	-

Glossary of Terms

- Loose fibres (Minor) - One or two fibres/fibre bundles identified during analysis by stereo microscope/PLM.
- Loose fibres (Major) - Three or more fibres/fibre bundles identified during analysis by stereo microscope/PLM.
- ACM Debris (Minor) - One or two small (<2mm) pieces of material attached to fibres identified during analysis by stereo microscope/PLM.
- ACM Debris (Major) - Large (>2mm) piece, or more than three small (<2mm) pieces of material attached to fibres identified during analysis by stereo microscope/PLM.
- Unknown Mineral Fibres - Mineral fibres of unknown type detected by polarised light microscopy including dispersion staining. The fibres detected may or may not be asbestos fibres. To confirm the identities, another independent analytical technique may be required.
- Trace - Trace levels of asbestos, as defined by AS4964-2004.

For further details, please contact the Asbestos Team.

Summary of Methods

The following table(s) gives a brief description of the methods used to conduct the analyses for this job. The detection limits given below are those attainable in a relatively simple matrix. Detection limits may be higher for individual samples should insufficient sample be available, or if the matrix requires that dilutions be performed during analysis. A detection limit range indicates the lowest and highest detection limits in the associated suite of analytes. A full listing of compounds and detection limits are available from the laboratory upon request. Unless otherwise indicated, analyses were performed at Hill Laboratories, 28 Duke Street, Frankton, Hamilton 3204.

Sample Type: Soil			
Test	Method Description	Default Detection Limit	Sample No
Asbestos in Soil			
As Received Weight	Measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	0.1 g	1-2
Dry Weight	Sample dried at 100 to 105°C, measurement on balance. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	0.1 g	1-2
<2mm Subsample Weight*	Sample ashed at 400°C, weight of <2mm sample fraction taken for asbestos identification if less than entire fraction. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	-	1-2
Asbestos Presence / Absence	Examination using Low Powered Stereomicroscopy followed by 'Polarised Light Microscopy' including 'Dispersion Staining Techniques'. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland. AS 4964 (2004) - Method for the Qualitative Identification of Asbestos in Bulk Samples.	0.01%	1-2
Description of Asbestos Form	Description of asbestos form and/or shape if present. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	-	1-2



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These samples were collected by yourselves (or your agent) and analysed as received at the laboratory.

Testing was completed on 14-Jun-2022. For completion dates of individual analyses please contact the laboratory.

Samples are held at the laboratory after reporting for a length of time based on the stability of the samples and analytes being tested (considering any preservation used), and the storage space available. Once the storage period is completed, the samples are discarded unless otherwise agreed with the customer. Extended storage times may incur additional charges.

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Danielle Carter BSc, PGDipSci, MSc
Laboratory Technician - Asbestos



R J Hill Laboratories Limited
 28 Duke Street Frankton 3204
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 Hamilton 3240 New Zealand

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 mail@hill-labs.co.nz
 www.hill-labs.co.nz

Certificate of Analysis

Page 1 of 4

Client: Insight Engineering	Lab No: 3320080	SPv2
Contact: Claude Midgley	Date Received: 11-Jul-2023	
C/- Insight Engineering	Date Reported: 20-Jul-2023	
PO Box 456	Quote No: 100740	
Cromwell 9384	Order No:	
	Client Reference: 22021	
	Submitted By: Claude Midgley	

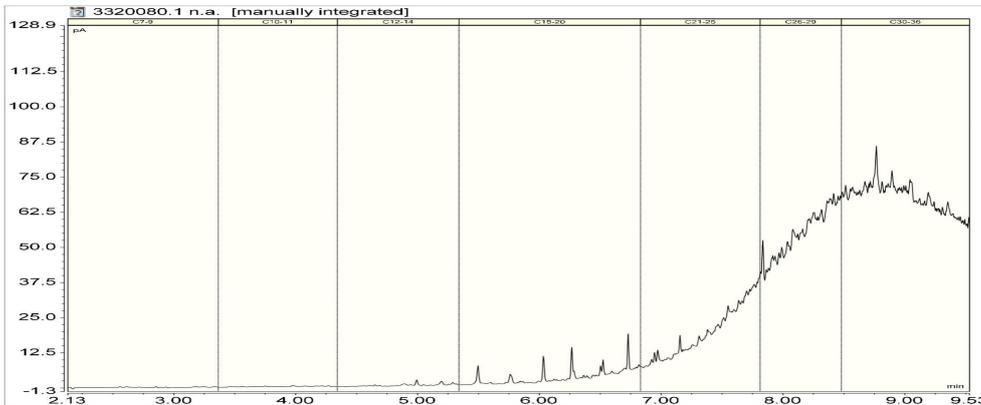
Sample Type: Soil						
Sample Name:	DR12 07-Jul-2023	DR13 07-Jul-2023	DR14 07-Jul-2023	DR15 07-Jul-2023	DR16 07-Jul-2023	
Lab Number:	3320080.1	3320080.2	3320080.3	3320080.4	3320080.5	
Individual Tests						
Dry Matter	g/100g as rcvd	94	-	-	-	-
Heavy Metals, Screen Level						
Total Recoverable Arsenic	mg/kg dry wt	8	6	5	7	7
Total Recoverable Cadmium	mg/kg dry wt	0.19	< 0.10	< 0.10	< 0.10	< 0.10
Total Recoverable Chromium	mg/kg dry wt	8	5	5	5	7
Total Recoverable Copper	mg/kg dry wt	91	69	10	22	23
Total Recoverable Lead	mg/kg dry wt	46	21	10.4	12.3	47
Total Recoverable Nickel	mg/kg dry wt	6	6	6	6	8
Total Recoverable Zinc	mg/kg dry wt	124	62	34	44	84
Total Petroleum Hydrocarbons in Soil						
C7 - C9	mg/kg dry wt	< 20	-	-	-	-
C10 - C14	mg/kg dry wt	75	-	-	-	-
C15 - C36	mg/kg dry wt	6,800	-	-	-	-
Total hydrocarbons (C7 - C36)	mg/kg dry wt	6,900	-	-	-	-
Sample Name:	DR17 07-Jul-2023	DR18 07-Jul-2023	DR19 07-Jul-2023	DR20 07-Jul-2023	DR21 07-Jul-2023	
Lab Number:	3320080.6	3320080.7	3320080.8	3320080.9	3320080.10	
Individual Tests						
Dry Matter	g/100g as rcvd	-	-	-	-	77
Heavy Metals, Screen Level						
Total Recoverable Arsenic	mg/kg dry wt	4	7	10	158	12
Total Recoverable Cadmium	mg/kg dry wt	0.18	0.12	0.43	0.16	< 0.19
Total Recoverable Chromium	mg/kg dry wt	3	6	9	72	12
Total Recoverable Copper	mg/kg dry wt	11	16	59	220	25
Total Recoverable Lead	mg/kg dry wt	9.7	60	124	178	34
Total Recoverable Nickel	mg/kg dry wt	4	6	9	7	8
Total Recoverable Zinc	mg/kg dry wt	50	66	240	550	3,700
Total Petroleum Hydrocarbons in Soil						
C7 - C9	mg/kg dry wt	-	-	-	-	27
C10 - C14	mg/kg dry wt	-	-	-	-	186
C15 - C36	mg/kg dry wt	-	-	-	-	26,000
Total hydrocarbons (C7 - C36)	mg/kg dry wt	-	-	-	-	27,000



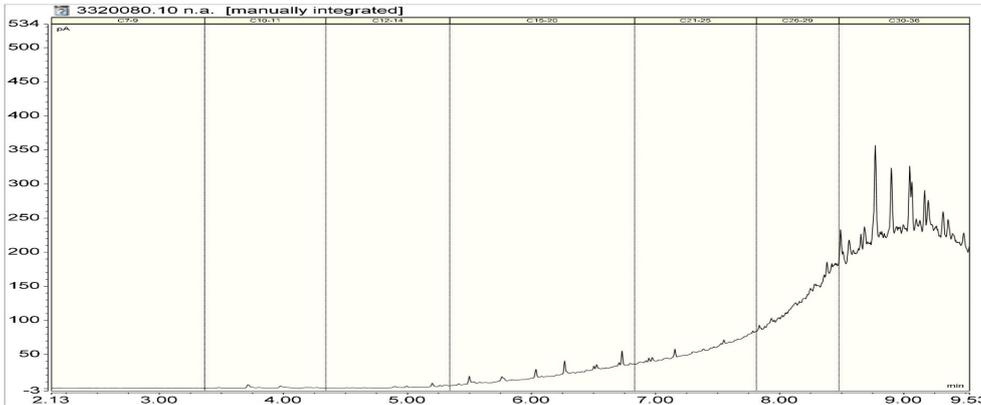
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Sample Type: Soil			
Sample Name:		DR22 07-Jul-2023	DR23 07-Jul-2023
Lab Number:		3320080.11	3320080.12
Individual Tests			
Dry Matter	g/100g as rcvd	-	76
Heavy Metals, Screen Level			
Total Recoverable Arsenic	mg/kg dry wt	11	6
Total Recoverable Cadmium	mg/kg dry wt	< 0.10	0.24
Total Recoverable Chromium	mg/kg dry wt	9	7
Total Recoverable Copper	mg/kg dry wt	16	16
Total Recoverable Lead	mg/kg dry wt	28	26
Total Recoverable Nickel	mg/kg dry wt	7	7
Total Recoverable Zinc	mg/kg dry wt	74	85
Organochlorine Pesticides Screening in Soil			
Aldrin	mg/kg dry wt	-	< 0.014
alpha-BHC	mg/kg dry wt	-	< 0.014
beta-BHC	mg/kg dry wt	-	< 0.014
delta-BHC	mg/kg dry wt	-	< 0.014
gamma-BHC (Lindane)	mg/kg dry wt	-	< 0.014
cis-Chlordane	mg/kg dry wt	-	< 0.014
trans-Chlordane	mg/kg dry wt	-	< 0.014
2,4'-DDD	mg/kg dry wt	-	< 0.014
4,4'-DDD	mg/kg dry wt	-	< 0.014
2,4'-DDE	mg/kg dry wt	-	< 0.014
4,4'-DDE	mg/kg dry wt	-	< 0.014
2,4'-DDT	mg/kg dry wt	-	< 0.014
4,4'-DDT	mg/kg dry wt	-	< 0.014
Total DDT Isomers	mg/kg dry wt	-	< 0.08
Dieldrin	mg/kg dry wt	-	< 0.014
Endosulfan I	mg/kg dry wt	-	< 0.014
Endosulfan II	mg/kg dry wt	-	< 0.014
Endosulfan sulphate	mg/kg dry wt	-	< 0.014
Endrin	mg/kg dry wt	-	< 0.014
Endrin aldehyde	mg/kg dry wt	-	< 0.014
Endrin ketone	mg/kg dry wt	-	< 0.014
Heptachlor	mg/kg dry wt	-	< 0.014
Heptachlor epoxide	mg/kg dry wt	-	< 0.014
Hexachlorobenzene	mg/kg dry wt	-	< 0.014
Methoxychlor	mg/kg dry wt	-	< 0.014

3320080.1
 DR12 07-Jul-2023
 Client Chromatogram for TPH by FID



3320080.10
 DR21 07-Jul-2023
 Client Chromatogram for TPH by FID



Summary of Methods

The following table(s) gives a brief description of the methods used to conduct the analyses for this job. The detection limits given below are those attainable in a relatively simple matrix. Detection limits may be higher for individual samples should insufficient sample be available, or if the matrix requires that dilutions be performed during analysis. A detection limit range indicates the lowest and highest detection limits in the associated suite of analytes. A full listing of compounds and detection limits are available from the laboratory upon request. Unless otherwise indicated, analyses were performed at Hill Labs, 28 Duke Street, Frankton, Hamilton 3204.

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Individual Tests			
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Dry Matter	Dried at 103°C for 4-22hr (removes 3-5% more water than air dry) , gravimetry. (Free water removed before analysis, non-soil objects such as sticks, leaves, grass and stones also removed). US EPA 3550.	0.10 g/100g as rcvd	1, 10, 12
Heavy Metals, Screen Level	Dried sample, < 2mm fraction. Nitric/Hydrochloric acid digestion US EPA 200.2. Complies with NES Regulations. ICP-MS screen level, interference removal by Kinetic Energy Discrimination if required.	0.10 - 4 mg/kg dry wt	1-12
Organochlorine Pesticides Screening in Soil	Sonication extraction, GC-ECD analysis. Tested on as received sample. In-house based on US EPA 8081.	0.010 - 0.06 mg/kg dry wt	12
Total Petroleum Hydrocarbons in Soil			

Sample Type: Soil			
Test	Method Description	Default Detection Limit	Sample No
Client Chromatogram for TPH by FID	Small peaks associated with QC compounds may be visible in chromatograms with low TPH concentrations. QC peaks are as follows: one peak in the C12 - 14 band, the C21 - 25 band and the C30 - 36 band. All QC peaks are corrected for in the reported TPH concentrations.	-	1, 10
C7 - C9	Solvent extraction, GC-FID analysis. In-house based on US EPA 8015.	20 mg/kg dry wt	1, 10
C10 - C14	Solvent extraction, GC-FID analysis. Tested on as received sample. In-house based on US EPA 8015.	20 mg/kg dry wt	1, 10
C15 - C36	Solvent extraction, GC-FID analysis. Tested on as received sample. In-house based on US EPA 8015.	40 mg/kg dry wt	1, 10
Total hydrocarbons (C7 - C36)	Calculation: Sum of carbon bands from C7 to C36. In-house based on US EPA 8015.	70 mg/kg dry wt	1, 10

These samples were collected by yourselves (or your agent) and analysed as received at the laboratory.

Testing was completed between 11-Jul-2023 and 20-Jul-2023. For completion dates of individual analyses please contact the laboratory.

Samples are held at the laboratory after reporting for a length of time based on the stability of the samples and analytes being tested (considering any preservation used), and the storage space available. Once the storage period is completed, the samples are discarded unless otherwise agreed with the customer. Extended storage times may incur additional charges.

This certificate of analysis must not be reproduced, except in full, without the written consent of the signatory.



Ara Heron BSc (Tech)
Client Services Manager - Environmental

ENVIRONMENTAL Analysis Request Form

CLIENT

Name **Insight Engineering** [229068]
 PO Box 456
 Cromwell 9342
 Phone: 021 556 549 Fax:
 Client Reference: 22028 (Project Code)
 Quote Number: Order No: (Cost Centre)

Job No: Date Recv: 09-Jun-22 12:36
Hill Laboratories 301 0068

R J Hill Laboratories Limited — accredited
 Accreditation NZ
 1 Clyde Street, Telephone:
 Private Bag 3205, Facsimile:
 Received by: Callum MacDonald
 Hill Laboratories office use only:
 Date In Job # No. of Samples



RESULTS TO

Mail Client Mail Submitter
 Fax Results
 Email Results claud@insighteng.co.nz

C.O.C & coversheet to be scanned and emailed back

Chain of Custody Record

Delivered to Hill Laboratories (Depatched by) Date & Time: 8/06/2022 14:30 Name: Claude Midgley Signature: *C Midgley*
 Received at Hill Laboratories Date & Time: Name: Signature:
 Condition Ambient Temp Chilled ____ °C

PRIORITY

Normal (up to 10 days) High (approx 5 days) Urgent (MUST be pre-arranged)
 Results required by:

Sample types

GW Bore/well TW Trade waste S Saline water ES Soil/Solid PI Plant
 SW Surface water E Effluent O Oil Sed Sediment BM Fish/shellfish/Biota
 P Potable/DI L Leachate SI Sludge BS Biosolid M Misc (Specify)

Site ID	Sample type	Tests required	Comments
DR1	ES	MSHMs	
DR2	ES	MSHMs; TPHOI	
DR3	ES	MSHMs	
DR4	ES	MSHMs	
DR5	ES	MSHMs	
DR6	ES	MSHMs	
DR7	ES	MSHMs; OCPs	
DR8	ES	MSHMs; TPHOI	
DR9	ES	MSHMs; OCPs	

KB Item: Version: 1

ENVIRONMENTAL Analysis Request Form

Job No: Date Recv: 11-Jul-23 11:43

Hill Labor **332 0080**

CLIENT

Name **Insight Engineering** [229068]

PO Box 456

Cromwell 9342

Phone: 021 556 549

Fax:

Client Reference: 22021

(Project Code)

Quote Number: 100740

Order No:

(Cost Centre)

R J Hill Laboratories Limited
Accreditati

Received by: David Manson

1 Clyde Street, Teleph
Private Bag 3205, Facsi



3133200806



Hill Laboratories office use only:

Date In Job # No. of Samples

Submitted By **Claude Midgley** [228982]

Charge To: **Insight Engineering** [229068]

RESULTS TO

Mail Client

Mail Submitter

Fax Results

X Email Results

claude@insighteng.co.nz

C.O.C & coversheet to be scanned and emailed back

Chain of Custody Record

Delivered to **Hill Laboratories** (Depatched by)
Date & Time: 10/7/2023 12:30
Name: Claude Midgley
Signature: *[Signature]*

Received at **Hill Laboratories**
Date & Time:
Name:
Signature:

Condition Ambient Temp Chilled 12.7 °C

Additional Information

PRIORITY

Normal (up to 10 days)

High (approx 5 days)

Urgent (MUST be pre-arranged)

Results required by:

Sample types

GW Bore/well TW Trade waste S Saline water ES Soil/Solid PI Plant
SW Surface water E Effluent O Oil Sed Sediment BM Fish/shellfish/Biota
P Potable/DI L Leachate SI Sludge BS Biosolid M Misc (Specify)

Site ID	Sample type	Tests required	Comments
DR12	ES	MSHMs + TPHOI	Collected 7/7/2023
DR13	ES	MSHMs	Collected 7/7/2023
DR14	ES	MSHMs	Collected 7/7/2023
DR15	ES	MSHMs	Collected 7/7/2023
DR16	ES	MSHMs	Collected 7/7/2023
DR17	ES	MSHMs	Collected 7/7/2023
DR18	ES	MSHMs	Collected 7/7/2023
DR19	ES	MSHMs	Collected 7/7/2023
DR20	ES	MSHMs	Collected 7/7/2023
DR21	ES	MSHMs + TPHOI	Collected 7/7/2023
DR22	ES	MSHMs	Collected 7/7/2023
DR23	ES	MSHMs + OCPsc	Collected 7/7/2023



6 March 2024

Shanon Garden
Navigate Property Limited
PO Box 84
Cromwell 9342

Remediation Action Plan – 155 Dunstan Road, Alexandra

Our Reference: 23036_RAP

1 Introduction

1.1 Background

Shanon Garden of Navigate Property Limited requested that JKCM Ltd, trading as Insight Engineering (IE) complete this Remediation Action Plan (RAP), including an assessment of available remedial options, for the property (herein referred to as 'the site') at 155 Dunstan Road and the westernmost portion of the property at 129 Gilligans Gully Road, Alexandra (herein referred to as "the site").

Contamination impacts were identified by IE during completion of a preliminary and detailed environmental site investigation in 2017 (report reference 17017, dated 31 August 2017)¹ and 2023 (report reference 23036, dated 11 October 2023)². Although some information is summarised in this RAP, it is recommended that this document is read in conjunction with the site investigation reports^{1,2} for completeness.

Resource Consent (RC 230380)³ has been applied for, to subdivide the property, creating 40 residential allotments plus one allotment to vest as road. The proposed subdivision plan is provided in Appendix 2. A Request for Further Information (RFI) was issued on 2 February 2024, requiring (amongst other things) that an indicative remediation action plan (RAP) and contaminated site management plan (CSMP) be provided during the consent processing stage. Given the relatively small areas of contamination impacts, as well as the fact that the remediation works can be completed within approximately one day, after which the site will not be considered to be contaminated, a CSMP is not considered necessary in addition to the RAP.

Figure 1 indicates the location of the site and impacted areas where contamination concentrations exceed the Ministry for the Environment (MfE) National Environmental Standard (NES) *Assessing and Managing Contaminants in Soil to Protect Human Health*⁴ Soil Contaminant Standards (SCSs) for the protection of human health under the standard residential land use scenario.

1.2 Purpose

The purpose of this report is to assess and conclude on the suitability of various options available to remediate the site, in accordance with the MfE *Contaminated Land Management Guideline No. 1: Reporting on Contaminated Sites in New Zealand*⁵ (CLMG#1) and NES⁴, and then to provide procedures to enable implementation of the recommended remedial strategy / strategies.

Insight Engineering

PO Box 456, Cromwell

www.insighteng.co.nz

Remediation Action Plan – 155 Dunstan Road, Alexandra

1.3 Objectives

In this context, the RAP has the following specific objectives:

- Review past site investigation reports to assess contaminant distribution;
- Identify the possible remedial options available, the method of risk reduction associated with each option, and the estimated positives and negatives associated with each remedial method;
- Recommend one, or several, methods that could adequately reduce the risk to human health at the site; and
- Provide procedures required to complete the remedial work in a safe and sustainable manner.

The limitations of this document are outlined in Section 10.

2 Site Description

The majority of 155 Dunstan Road is considered to be relatively flat, or very gently sloping with a gradient towards the south west. The north eastern quarter of the site contains the gently sloping toe end of a landscape-scale terrace orientated north west / south east. The slope steepens and becomes moderate to steep approximately 100 m beyond the north eastern property boundary, including the easternmost site boundaries within 129 Gilligans Gully Road.

Several low (~200 mm above the surrounding site surface) ridges are present along a north west / south east axis in the south western paddock. These are remnants of a border dyke irrigation system that had been used for flood irrigation in that part of the site.

An earth bund extends from the south western paddock, along the northern property boundary, to the boundary between 155 Dunstan Road and 129 Gilligans Gully Road. It is presumed that this feature was associated with the transfer of water from a water race that was formerly located between 155 Dunstan Road and 129 Gilligans Gully Road.

Table 1: Summary of Site Information and Description.

Location	155 Dunstan Road; and 129 Gilligans Gully Road, Alexandra
Legal Description	Lot 1 DP518150 Lot 3 DP399742
Property Owner	One Five Five Developments LP
Former Site Use	Rural residential and commercial (poultry farm, then contractor's storage yard)
Current Site Use	Rural residential
Proposed Site Use	Residential
Site Area	Approximately 41,500 m ² (4.15 ha)
Territorial Authorities	Central Otago District Council Otago Regional Council

Remediation Action Plan – 155 Dunstan Road, Alexandra

Table 1 (cont.): Summary of Site Information and Description.

Zoning	RR (Rural Residential) at the time of reporting.
Nearest Surface Water & Use	The Clutha River / Mata-Au, used as a source of potable water as well as for recreational and irrigation purposes, is located approximately 1.3 km west of the south western corner of the site. Surface water is also present in farm dams on properties towards the east, north and north east. The nearest of these is located approximately 440 m towards the east of the north eastern corner of the site.
Geology	The GNS New Zealand Geology Webmap ⁶ indicates that the site is within the "Late Pleistocene outwash deposits" geological unit described as ' <i>Unweathered to slightly weathered, loose, sandy to silty, well rounded gravel usually on large outwash plains.</i> ' The surface material observed during the sit visit is described as silty sand.
Hydrogeology	According to information provided by ORC, the depth to water recorded in nearby wells (G42/0615, G42/0751, G42/0798 and G42/0828) ranged between 18.4 and 19 m below ground level (bgl). The nearest of those wells is G42/0751 which is located roughly 55 m south of the site. Therefore, given the site elevation varies slightly between the south western and north eastern ends, groundwater at the site is expected to be encountered between approximately 18.5 m at the south western side and up to 24 m bgl on the north eastern end. Predicted groundwater flow direction is based on an ORC ⁷ report and a diagram provided by ORC. Based on this information, the site is located over the Dunstan Flats Aquifer and groundwater is considered likely to flow towards the south-south-west.

2.1 Contaminants of Concern

Heavy metals (arsenic and lead) and petroleum hydrocarbons have been identified to be present at concentrations exceeding the residential SCSs.

2.2 Contaminant Distribution

The assessment completed by IE in October 2017 confirmed that contamination impacts requiring remediation are limited to two areas, namely the north western side of the workshop north of the dwelling and along the fence line running approximately north west to south east in approximately the centre of the site.

No samples were required to be collected from areas where oil stains were visible, as the aesthetic impact serves as a surrogate for the estimated health criterion of 20,000 mg/kg where an aesthetic impact is expected to occur⁸. Therefore, any areas where oil stains are visible require remediation.

The impacted areas are displayed on Figure 3.

2.3 Volume of Contaminated Soil

The total volume of soil that is estimated to be impacted with contaminant concentrations exceeding the residential SCSs is approximately 10 m³. This is made up of 1.6 m³ at the location of sample DR1,

Remediation Action Plan – 155 Dunstan Road, Alexandra

1 m³ at the location of sample DR2, 2 m³ at the location of sample DR8, 0.2 m³ at the location of sample DR21 and up to 5 m³ from the areas surrounding timber fence posts.

A 25 % margin of error should also be included in the estimation to allow for any unforeseen variations (greater depth) in the contaminant distribution.

3 Assessment of Remedial Options

The following section of the report identifies potential remedial options that are considered suitable for remediating soil contaminated with heavy metals and petroleum hydrocarbons that have been successfully conducted at field scale level and that have been documented at contaminated site case studies both nationally and internationally. Table 2 provides a brief description of the remedial method and an assessment of whether this method is applicable to this site given its setting, proposed land use, contaminant volume, and distribution across the site and throughout the soil profile, as well as the required timeframe to complete the work.

Table 2: Assessment of Remedial Methods for Hydrocarbon Impacted Soil.

Remedial method	Description	Applicable and feasible at the site?
Electrokinetics	Electrokinetics is the application of low intensity current between electrodes placed in the soil (in-situ or ex-situ) to mobilise the contaminants towards the polarised electrodes thereby concentrating them and allowing their subsequent removal in a smaller volume of soil ⁹ .	Not considered applicable or financially viable at the site given the nature of the contamination, which is not considered to be particularly mobile in soil, as well as the small volume of contamination compared with the cost of the equipment for this remedial method.
Phytoremediation	Involves the planting of certain grasses and trees which uptake the contaminants from the soil root zone into above ground plant tissue. Plants are removed after a sufficient period and disposed of at an appropriate facility ⁹ .	Not considered applicable or feasible at the site given the length of time taken to remediate the site compared with the available timeframe to enable residential development.
Solidification/stabilisation	<p>Solidification refers to a process that involves binding contaminated soil with a reagent such as cement and therefore changing its physical properties by increasing the strength, decreasing its permeability and encapsulating the contaminants to form a solid material¹⁰.</p> <p>The stabilisation process refers to a chemical reaction that reduces the leachability of contaminated soil, thereby immobilising the waste and reducing its solubility; thus making the soil less harmful or less mobile. Solidification/stabilisation treatment typically involves mixing a binding agent into the contaminated soil.</p> <p>These techniques are done either in-situ, by injecting the binder agent into the contaminated media, or ex-situ by excavating the materials and machine mixing them with the agent.</p>	Remediation technique is not considered applicable to the site given the geotechnical limitations this technique creates. Varying soil strength in different parts of the site could affect foundation platforms and potentially lead to differential settlement of buildings over time.

Remediation Action Plan – 155 Dunstan Road, Alexandra

Soil washing	This method would typically involve physical and chemical separation of the majority of the contaminants into a smaller volume which is then disposed of or treated further. The washed or processed soil is then returned to the site. Physical separation typically involves standard mineral processing equipment to remove the finer particles which are likely to contain the majority of the contaminants. Chemical washing involves transferring the contaminants from the soil into solution which is subsequently treated ¹¹ .	Given the anticipated relatively small volume (approximately 10 m ³) of soil to be remediated and time and associated costs to design and set up the soil washing this remedial approach is considered not a financially viable option. This option would also produce other waste streams that would require treatment/disposal.
'Do nothing' approach	Continue with the residential development and install a management approach regarding site access and onsite activities and use.	Not considered applicable at the site given the concentrations of arsenic, lead and petroleum hydrocarbons identified in the shallow soil significantly exceed the SCS (health) for residential land use ⁴ .
Offsite disposal	This involves the physical excavation of the contaminated soil and offsite disposal at an appropriate waste disposal facility.	Considered applicable given volume of soil to be removed, its location within the soil profile allowing it to be removed with ease and the availability of local disposal facilities.
Containment	This remedial approach would involve excavating the contaminated soil identified across the site and placing within a purpose built containment cell. Containment cells are typically constructed with impermeable clay and HDPE liners.	Considered applicable given the limited volume of impacted soil. A containment cell could be positioned beneath the vested road, which would eliminate the risks to human health and the environment.
Capping	This remedial method involves capping the site with a sufficient thickness of clean imported soil thereby restricting the exposure pathways to onsite users.	Considered applicable, however this method is unlikely to be geotechnically suitable as topsoil needs to be stripped when preparing to construct a dwelling. If the current topsoil layer is buried, the future foundations of a new dwelling would likely need to bear in deeper soil layers and therefore require disturbance of the capped contaminated soil.

3.1 Applicability Assessment

Two remedial options are considered to be more feasible than the rest, to manage risks associated with the contamination identified in the soil at the site. While offsite disposal is not viewed as a sustainable remediation solution, the relatively small volume of impacted soil in this case makes the 'dig and dump' approach viable for a subdivision of this size.

Alternatively, the small volume of impacted soil can be contained beneath the vested road to eliminate the potential risks to human health of the environment. The containment area would be over excavated to create space for the contaminated soil to be placed deep enough to ensure that the roading subgrade is not negatively affected.

Remediation Action Plan – 155 Dunstan Road, Alexandra

4 Discussion

Both remediation options mentioned in Section 3.1 result in some risks to worker health and the wider environment, therefore implementation of the approach should be under a RAP detailing the health and safety, environmental and regulatory considerations, and site validation methodology required.

The following sections represent a RAP, which can be implemented upon confirmation of suitability by the CODC Environmental Engineering Manager.

5 Remediation Methodology

5.1 Introduction

IE has developed the following methodology detail to complete the remediation of the site and ensure that residual contamination (if any) is unlikely to pose a risk to human health.

5.2 Description of Remedial Works

The extent of the proposed remedial work, based on visual and analytical assessment performed by IE, is presented in Figure 3.

The remedial works will be undertaken in the following order:

- A site meeting will be held with the contractor responsible for physical works, to ensure that the methodology and requirements of this RAP have been communicated and understood;
- Physical works will be undertaken by the designated remediation contractor and observed by IE staff;
- Validation observations will be made in areas where aesthetic impact represents the surrogate for the estimated health criterion and validation samples will be collected from areas where visual assessment of impacts is not appropriate;
- Validation samples will be tested for contaminants of concern by an Internationally Accredited laboratory; and
- A soil validation report (SVR) will be completed within four weeks of receiving the final validation laboratory results. The SVR will be provided to stakeholders following the completion of the remediation. The SVR will contain relevant information recommended by the CLMG#1⁵.

To ensure that there are no adverse environmental effects beyond the immediate vicinity of the remediation area, the earthwork activities shall be undertaken in accordance with the protocols outlined in this RAP.

The primary potential risks associated with the chosen remedial method to be employed at this site are from the disturbance of contaminated soil during earthwork activities on site. Wherever possible, plant movements over the contaminated areas will be minimised to prevent disturbance of the existing surface layer and exposure to the remediation workers and potentially nearby members of the public from the underlying contaminants.

Potential risks associated with arsenic, lead and petroleum hydrocarbons relate to dermal contact, ingestion and inhalation of soil particles. These risks will be kept to a minimum through the use of controlling site access, dust mitigation measures, and the provision and use of personnel protection equipment. Information relating to minimising such risks is outlined in Section 6.0.

Remediation Action Plan – 155 Dunstan Road, Alexandra

This RAP should not be used as a standalone document but should supplement the earthwork operators own health and safety protocols for their employees and contractors.

While some tasks may overlap during the remediation, the following outline indicates the proposed sequencing of works:

- Site establishment and kick-off meeting;
- Excavation and off-site disposal of contaminated material;
- Validation observations and sample collection;
- Validation reporting; and
- Continuation of the bulk subdivision earthworks to form the final site surface.

These works are described in further detail in the following sections.

5.3 Site Establishment

5.3.1 Procedures

Prior to the remedial works commencing at the site, the remediation supervisor will outline all relevant Health and Safety requirements to personnel working on site during the remediation works. Such requirements will be documented within a detailed Health and Safety Plan (HASP) which will be kept in the site file. In general, the following procedures will be adhered to, to ensure that the health and safety, and environmental measures are achieved:

- Personal safety equipment and procedures associated with the contaminants will be explained to remediation contractors; and
- The identification and marking out of the proposed remediation areas, exclusion zones and remediation traffic routes will be completed by the remediation supervisor prior to commencement of the remediation program. Vehicles movements will be managed so that contamination is not tracked offsite. 'Clean' and 'dirty' areas will be identified so that trucks remain in clean areas where practical.

5.3.2 Site Supervision

To provide control and validation of the proposed remedial works it is recommended that a designated, suitably trained site supervisor is present to oversee the works. The site supervisor would address field changes as necessary should unanticipated conditions arise.

Prior to earthwork activities commencing, all employees and contractors working at the site shall be inducted by the remediation supervisor as to the potential contamination hazards at the site and the procedures that should be implemented to avoid or mitigate potential adverse effects to human health and the environment.

Prior to earthworks activities commencing, all employees and contractors associated with the remedial work shall also be briefed by the remediation contractors site representative with respect to any potential hazards on the site relevant to their role.

5.3.3 Health and Safety

This RAP identifies potential hazards associated with the presence of arsenic, lead and petroleum hydrocarbons in site soils and recommends procedures to mitigate these risks. Risks associated with elevated concentrations of arsenic, lead and hydrocarbons relates to dermal contact, ingestion and to

Remediation Action Plan – 155 Dunstan Road, Alexandra

inhalation of contaminated soil particles during earthwork activities. Prior to the commencement of the remediation works a HASP will be prepared for the proposed activities. All site personnel will be required to review this document. At the start of each day a brief “tool box” meeting shall be held to review the HASP and the proposed work for the day, discuss potential perceived health and safety risks as well as environmental management procedures and communicate these issues to the remediation team.

To prevent the transfer of any contamination off site or to other areas within site, and to minimise exposure to site remediation workers the following risk mitigation measures will be followed:

- Mobile heavy equipment is to be parked outside each exclusion zone or in designated clean areas. This area is to be visually assessed following completion of the earthworks to ensure that any contaminated soil spilt during loading is removed;
- To minimise exposure to airborne dust, the excavator and truck driver shall keep cab windows closed and use air conditioning when excavating and loading contaminated soil;
- Contractors working outside shall wear a half face disposable mask or filter type particulate respirator, only if dust is generated during completion of remedial works; and
- Eating, drinking, smoking, use of mobile phones and applying cosmetics / sunscreen should only occur outside of the remediation areas and after face and hands have been thoroughly washed with potable water.

5.4 Validation of Works

The extent of the excavation will be determined by visual observation by the remediation supervisor, and defined by the aesthetic impacts associated with petroleum hydrocarbons during the remedial works.

Where visual assessment of impacts is not considered appropriate, such as in areas where arsenic and lead are present, the remediation supervisor will use a portable X-Ray Fluorometer (XRF) to assess the heavy metals concentrations and determine the extent of the excavation.

In areas where the XRF or remediation supervisors judgement was called upon, it will also be necessary to obtain laboratory samples from the base and sides of the excavated area to validate that residual contamination (if any) concentrations are below the NES residential land use criteria.

5.4.1 Selection of Remedial Goals

The proposed remedial goals are based on the NES SCSs⁴ for the protection of human health at a standard residential site. For the contaminants of concern at this site, petroleum hydrocarbons, the following remedial goals are considered appropriate:

- 20 mg/kg for arsenic;
- 210 mg/kg for lead;
- 510 mg/kg for C₁₀ – C₁₄ Hydrocarbons; and
- No visual presence for C₁₅ – C₃₆ Hydrocarbons.

5.4.2 Validation Methodology

Following the excavation of contaminated soil from areas impacted with petroleum hydrocarbons (engine oil stains), visual assessment of the presence of residual contamination will be completed by the remediation supervisor.

Remediation Action Plan – 155 Dunstan Road, Alexandra

Following excavation of contaminated soil from areas impacted with heavy metals, the remediation supervisor will use a portable XRF to assess whether additional excavation is required. Once the remediation supervisor is satisfied that the residual contamination impacts are likely to be below the remediation targets, samples will be collected from the base and sides of the excavated area to determine whether the remediation works have been successful and remaining soils meet criteria for the protection of human health at residential sites.

Relevant analyses will be completed on validation samples, by a suitable laboratory, to confirm that the concentrations of residual contamination (if any) are below the remediation targets. The results will be compared with the NES residential land use criteria to determine whether remaining soils are suitable, or whether additional excavation of impacted material is required.

All validation sampling shall be conducted in accordance with IE quality assurance/quality control procedures to avoid cross contamination (e.g., using and changing disposable gloves, cleaning sampling tools) and use of clean containers provided by the laboratory.

Once the laboratory analytical validation sample results from remnant soils at the site has been received and assessed, one of two scenarios will follow:

- Scenario 1 – The remediation supervisor is satisfied that no contamination exceeding residential land use criteria remains on site. In this instance the remediation will be considered complete and the SVR prepared.
- Scenario 2 – In the event that residential SCS are not met in any of the remediation areas further excavation and validation will be required, dictated by the location of the validation samples with exceedances. An additional round of validation sampling and testing will be conducted until the residential land use criteria are achieved.

5.4.3 Evidence of Appropriate Disposal

The contractor is to ensure that their proposed disposal facility is authorised to accept the contaminated material. Waste disposal docketts are to be retained and provided to the remediation supervisor, for inclusion in the Site Validation Report. This will demonstrate that the contaminated material was disposed of appropriately, to a facility authorised to accept such material.

5.4.4 Imported Clean Fill

Any topsoil or fill imported to the site for backfilling or depositing on the site shall meet the Ministry for the Environment definition¹² of cleanfill which states:

“Material that when buried will have no adverse effect on people or the environment. Cleanfill material includes virgin natural materials such as clay, soil, and rock, and other inert materials such as concrete or brick that are free of:

- *Combustible, putrescible, degradable or leachable components.*
- *Hazardous substances.*
- *Products or materials derived from hazardous waste treatment, hazardous waste stabilisation or hazardous waste disposal practices.*
- *Materials that may present a risk to human or animal health such as medical and veterinary waste, asbestos or radioactive substances.*
- *Liquid waste.”*

Remediation Action Plan – 155 Dunstan Road, Alexandra

Evidence that the imported fill (if any) meets this definition shall be provided by the earthworks contractor.

5.5 Timescales

It is expected that remediation earthworks could be completed within one day. This allows for setting up the works, excavation and validation sampling. All validation results should be available within two weeks following completion of the remediation earthworks. A complete site validation report could be presented within four weeks following completion of the remediation earthworks (under the circumstances where residual contamination is below the applicable SCS after completion of the initial remedial earthworks).

5.6 Final Grading

Importation of cleanfill (if any) and grading of the site surface can occur in areas where visual confirmation of remediation success has been achieved during completion of the remedial works.

Areas where validation sample results are required to confirm remediation success should not be included in the post-remediation earthworks until after laboratory confirmation of contaminant concentrations has been received.

5.7 Post Remediation

Other than areas of currently unknown sources of contamination, soil remaining at the site will not exceed criteria designed to be protective of human health.

In the event of disturbance and removal of other soils following remediation, standard management procedures that are suitable for non-contaminated site can be implemented unless previously unknown contamination is discovered.

6 Assessment of Environmental Effects

6.1 Introduction

This section of the RAP details the potential environmental effects that could occur from conducting the remediation outlined previously. Table 3 summarises the potential effects associated with the proposed remedial works and the management measures that are recommended to mitigate these. Remedial construction works will be managed to mitigate potential adverse effects during and after operations.

Table 3: Potential effects of remediation works and proposed mitigation measures.

Potential Effects	Receptor	Mitigation Measures
The potential for dust generation is high during the stockpiling, transportation and placement on Site.	Site workers and neighbours / members of the public are the primary receptors.	When wind speed is high enough to cause visible dust, roads and excavations will be wetted to suppress dust generation. Stockpiles of soil will be covered or stabilised with dust suppressant spray, as necessary.

Remediation Action Plan – 155 Dunstan Road, Alexandra

Excavator and truck noise will be generated during the remedial construction activities.	Duration of proposed works is short term and estimated to be less than 1 day.	All work will be conducted during regular daytime business hours. No unusually noisy machinery will be used.
Contaminated surface water, stormwater and sediment discharge from site during rainfall events.	Neighbouring properties.	The remediated areas will be graded so that surface water, which has the potential to transport contaminants, is diverted towards the excavations and away from the site boundaries.
Exposure to contaminated materials (direct contact with soil materials).	Site personnel and members of the public.	Control site access, no public access to be allowed. Instruction on site rules and site induction to site workers. Appropriate dust suppression. Good hygiene practices (hand washing, no smoking). Use of appropriate PPE. Suitable decontamination procedures.

6.2 Dust Control

The inhalation of contaminated dust on site during earthworks is considered to be a hazard to earthwork contractors and staff present within the site as well as members of the public.

The following activities may generate dust during the remedial works:

- Excavation of contaminated material.
- Transport of contaminated soil from the site.
- Placement/tipping of material at the receptor site.

It is recommended that the following control methods are implemented to ensure that dust levels generated by earthwork activities are kept to a minimum:

- Any material temporarily stockpiled should be covered or dampened as soon as possible.
- Avoid working or standing in areas down-wind of earthwork activities.
- Limit drop heights on excavator buckets when loading trucks.
- Keep windows / doors on excavators and trucks closed when parked in the earthworks area.
- Apply water by a cart or sprinkler prior to commencement of works. This should prevent visible dust emissions beyond the site boundary.

Weather reports will be checked at the beginning of each day and if high wind speeds are expected the above mitigation measures will be prepared. When wind speed exceeds such a level that dust is noted to be airborne, operations shall cease until appropriate dust mitigation measures have been put into action. The site health and safety officer or site foreman will be responsible for ensuring that the dust mitigation measures are implemented as necessary.

Remediation Action Plan – 155 Dunstan Road, Alexandra

6.3 Noise

The following protocols will be employed to ensure that noise levels are kept to acceptable standards:

- Earthwork activities will be restricted to the hours of 8:30 am to 5:00 pm Monday to Friday. No work shall be permitted on Saturdays, Sundays or Public Holidays.
- These remedial works will be required to comply with the New Zealand Standard NZS 6803: 1999 "Acoustics – Construction Noise"¹³. The remedial works are expected to be completed within approximately one day.

6.4 Stormwater Control

The site surface will be graded to divert stormwater towards excavated areas and away from site boundaries.

Any temporary stockpiled wastes will not be placed adjacent to drainage areas and will not contain contaminated soils. Runoff from the stockpiles will be mitigated by using silt fences, hay bales or other stormwater and sediment control techniques. Stockpiles will be located away from site drains or areas where uncontrolled contaminant release is likely.

6.5 Vehicle Movement

To limit dust generation all site machinery shall be limited to a site speed of 10 km/h.

6.6 Site Access

The remediation contractor will use appropriate means to ensure that members of the public are not able to enter the site during completion of remedial works. This may be through the use of fences, barrier tape, signs and / or personal observation and communication.

6.7 Decontamination

To prevent the potential transfer of contamination from the zone of remedial activities (exclusion zone) to uncontaminated areas, the field supervisor will ensure that equipment (excavator bucket) is washed in a manner so that the wash water is captured in the bed of the truck that contains the contaminated spoil prior to removal off-site.

6.8 Unforeseen Conditions / Circumstances

The potential for discovery of buried waste exists, due to the former owner disposing of burned domestic refuse in a pit in the north eastern portion of the site. In the event of accidental discovery of potentially contaminated material, or any other unforeseen circumstances related to potentially contaminated soil (stains, unnatural odours) the remediation supervisor should be consulted. Assessment of the contamination will be determined using the remediation supervisors judgement and knowledge of industry best practise.

7 Reporting

At the completion of the remediation and validation works a Site Validation Report (SVR) will be prepared outlining the remediation works undertaken and presenting the laboratory results of the remnant soils.

The SVR, shall be prepared in accordance with the CLMG#1⁵.

Remediation Action Plan – 155 Dunstan Road, Alexandra

8 Statutory considerations

8.1 Introduction

The Resource Management Act 1991 (RMA), and associated statutory planning documents, establish the framework for the management of all activities that utilise New Zealand's natural and physical resources. The remediation of the site is assessed against the requirements of these documents in the following sections of the RAP.

In relation to the proposed remediation, the relevant statutory documents are:

- Resource Management Act 1991 (RMA)¹⁴.
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES)⁴.
- Regional Policy Statement for Otago 1998 (RPS)¹⁵.
- Regional Plan: Waste for Otago 1997 (Waste Plan)¹⁶.
- Operative Central Otago District Plan 2008 (District Plan)¹⁷.

Part 2 of the RMA outlines the purpose and principles of the RMA. Section 5 states:

- “(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) In this Act, “sustainable management” means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –*
- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.”*

The proposed remediation of the contaminated land at the site is intended to ensure that the site can be used for residential purposes, without adverse effects on human health and safety. The ability to use the land resource safely, into the future, means that people and communities can provide for their social, economic and cultural well-being. In relation to the land, water and air resources of the area, the proposed remediation approach will ensure that life-supporting capacity is retained, while the current adverse effects of the contaminated site will, in the future, be avoided, remedied or mitigated.

Section 6 sets out the matters of national importance which shall be recognised and provided for while Section 7 identifies matters for which regard shall be had under the RMA. There are no section 6 matters which are considered to be of relevance to this proposal. However, the following section 7 matters are considered to be relevant:

- “(b) the efficient use and development of natural and physical resources:*
- (c) the maintenance and enhancement of amenity values:*
- (f) maintenance and enhancement of the quality of the environment”*

Remediation Action Plan – 155 Dunstan Road, Alexandra

The site is currently vacant. The proposed remediation method, as detailed in this RAP, will remediate the remnant contaminated land at the site to a standard suitable for residential use, enabling the efficient use of the land into the future, in so doing achieving the intent of Section 7(b)).

In addition, the management measures incorporated into the proposed remediation approach will ensure that the land, air and water resources of the area will not be adversely affected during the remediation process and into the future. This ensures that the quality of the surrounding environment is enhanced (section 7(f)), which in turn provides for enhancement of amenity values in the area (section 7(c)).

Section 8 of the RMA requires specific regard to be had to the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). There are no specific Treaty of Waitangi matters requiring consideration in accordance with section 8 of the RMA.

Given the above assessment, the proposed remediation approach, as outlined in this RAP, will promote the sustainable management of natural and physical resources and is therefore consistent with Part 2 of the RMA.

8.2 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

The NES⁴ came into effect on 1 January 2012. The objective of the NES is to ensure that land affected by contaminants in soil is appropriately identified and assessed at the time of being developed and if necessary remediated, or the contaminants contained, to make the land safe for human use.

All territorial authorities (district and city councils) are required to give effect to and enforce the requirements of the NES.

Regulation 5 sets out the land and the activities to which the NES applies. The NES applies if it is on land described under regulation 5(7), and if the activity proposed is described in any of subclauses (2) to (6) of Regulation 5.

Regulation 5(7), applies to any land on which an activity or industry described in the current edition of the Hazardous Activities and Industries List (HAIL) is being undertaken, is suspected to have been, or has been undertaken. Several activities undertaken at the site are included on the HAIL (refer to the site investigation reports^{1,2}). Therefore, regulation 5(7) applies.

The activities described in subclauses (2) to (6) of Regulation 5 include subdivision, land-use change, significant earthworks, soil sampling or removing fuel storage systems. The remedial approach involves disturbing the soil of the piece of land for a particular purpose, therefore the NES applies to this activity.

If the procedures and requirements provided in this RAP are implemented appropriately, the proposed remediation option is considered to meet the requirements of Regulation 8(3) and the remedial work can therefore be undertaken as a Permitted Activity.

As a result, a land use consent application under the NES is not required for the activity of disturbing and removing contaminated soil.

Remediation Action Plan – 155 Dunstan Road, Alexandra

8.3 Regional Policy Statement for Otago

8.3.1 Overview

The RPS¹⁵ became operative on 1 October 1998. Since becoming operative changes were notified in May 2015 and a decision was made in October 2016. Changes to the RPS are now in the appeals process.

The RPS provides an overview of the resource management issues within the Otago region. It then developments a policy framework (i.e., objectives and policies), and associated methods for delivering on that policy, aimed at achieving integrated management of the region's natural and physical resources. Regional Plans, including the Waste Plan, and district plans cannot be inconsistent with the RPS.

8.3.2 Assessment of Relevant Objectives and Policies

Section 13 of the RPS addresses issues, and develops an associated policy framework, in relation to 'Wastes and Hazardous Substances'. This includes contaminated sites. Therefore, the policy framework of relevance to the proposed remediation, as outlined in Section 13 of the RPS, is:

- To minimise the risks, to people and the environment, arising from existing contaminated sites (Objective 13.4.4).
- To address the adverse effects from past waste disposal, including identified contaminated sites, by remedying and mitigating any adverse effects arising from such sites (Policy 13.5.7).

The proposed remediation approach, as outlined in this RAP, has been developed to minimise the future risks to people and the environment. This is to be achieved by removing the contaminated soil from the property by excavation and disposal at a suitable facility, then importing additional cleanfill which will be graded to final contours and levels. In so doing the pathway for direct exposure of people to the contaminated soils is eliminated and potential adverse effects to people arising from the past land contamination are remedied and mitigated. A previous investigation has indicated that the contaminants of concern are unlikely to affect groundwater users or sensitive environmental receptors. On this basis, the proposed remediation approach is consistent with the relevant policy framework of the RPS.

8.4 Regional Plan: Waste for Otago

8.4.1 Overview

The Waste Plan¹⁶ became operative on 11 April 1997. Since becoming operative there have been no documented reviews carried out or plan changes notified. The Waste Plan seeks to provide for the integrated management of waste (solid, liquid and gaseous) through the implementation of a waste strategy which addresses all stages of the waste life cycle.

Chapter 5 of the Waste Plan covers Contaminated Sites, and includes the discharge of hazardous substances or wastes onto or into land or water, and the issues associated with remedying or mitigating the adverse effects of those contaminant discharges. Therefore, Chapter 5 is of relevance to the proposed remediation of the site.

Chapter 7 of the Waste Plan covers Landfills, which includes the disposal of solid wastes onto or into land. As the remediation method consists of the deposition of contaminated material, excavated from the site, to land Chapter 7 is also of relevance to the proposed remediation.

8.4.2 Assessment of Relevant Objectives and Policies

The policy framework within Chapter 5 of relevance is:

Remediation Action Plan – 155 Dunstan Road, Alexandra

- To avoid, remedy or mitigate any adverse effects of contaminated sites (Objective 5.3.1).
- To contain and remediate contaminated sites, to the extent that is practicable, and having regard to the land's future use (Policy 5.4.3).
- To apply the Australia and New Zealand Conservation Council's "Guidelines for the Assessment and Management of Contaminated Sites" (January 1992) to determine, for a particular contaminated site, the most appropriate course of action (Policy 5.4.4).

The proposed remediation of the contaminated land associated with this site, has been designed, utilising the current relevant guidelines (i.e., guidelines that have superseded those specified in Policy 5.4.4 above), to ensure that the land can be utilised in a manner consistent with its proposed future use (i.e., residential land use). This means that the adverse effects of the contaminated site will be avoided, remedied and mitigated as a result of the proposed remediation.

Given the above assessment, the proposed remediation approach is consistent with objective 5.3.1 and policies 5.4.3 and 5.4.4 of the Waste Plan.

The policy framework within Chapter 7 is mostly relevant to typical landfills, and not the proposed remediation activity. However Objective 7.3.1 (*to avoid, remedy or mitigate the adverse environmental effects arising from the discharge of contaminants at and from landfills*) is of some limited relevance to the remediation method.

8.4.3 Assessment of rule applicability

The Waste Plan contains only one rule (Rule 5.6.1) covering activities in and around contaminated land as follows:

"5.6.1 Hazardous wastes at contaminated sites (discretionary activity).

1. *The disturbance of land; or*
2. *The discharge of hazardous waste into water; or*
3. *The discharge of hazardous waste onto or into land in circumstances that may result in that hazardous waste (or any other hazardous waste emanating as a result of natural processes from that hazardous waste) entering water; or*
4. *The deposit of any hazardous waste, in , on or under land; or*
5. *The discharge of hazardous waste into air at or from a contaminated site; is a discretionary activity."*

The excavation and disposal of the contaminated soil requires the disturbance of land and a discharge of hazardous waste to land (at the receptor site). As such, resource consent is required for the proposed remediation pursuant to Rule 5.6.1.

The rules covering the discharges of waste onto or into land are contained in Section 7.6 of the Waste Plan and these will be applicable to the operator of the receptor site.

8.5 District Plan

8.5.1 Overview

The Central Otago District Plan was made operative on 1 April 2008. The NES Regulations⁴ have been in effect since 2011. At that time, the Council would have been required to amend the Operative District Plan without using the traditional Schedule 1 process to ensure that it did not contain any rules which duplicate, are more strict or more lenient than the NESCS, as required by sections 43B and 44A of the RMA. Therefore, the Operative District Plan defers to the NES as intended by the design of the NES.

Remediation Action Plan – 155 Dunstan Road, Alexandra

8.5.2 Operative District Plan

Under the Operative District Plan the site is located in the Rural Resource Area (Rural Residential). There are no objectives or policies specifically referring to remediation of contaminated sites in the operative District Plan. References to contamination are generally in the context of activities which may result in contamination to water supplies or affect productive soils (i.e Rural Resource Area Issues Statement section 4.2), and these provisions are not related to the remediation of land potentially contaminated through former land uses.

Section 17: Hazards, of the Operative District Plan, contains provisions managing hazardous substances. Issues Statement 17.2.3 addresses the location, use, transportation and disposal of hazardous substances. Related Policy 17.4.5 – Hazardous Substances and Processes is:

17.4.5 Policy - Hazardous Substances and Processes

To ensure that activities which involve the use, production or transportation of hazardous substances, and/or hazardous processes are designed and/or located in a manner that avoids or mitigates any risk to the environment and the community's health and safety, to a level that is acceptable to the community.

The policy is intended to manage activities where the principal activity contains a hazardous substance and the rule framework in the Operative District Plan does not regulate the legacy effects of hazardous substance use and disposal from permitted activities such as farming or residential scale activities. These activities are managed by the NESCS.

8.5.3 Plan Change 19

The Council notified a review of its residential zone framework in September 2022, a decision on submissions is expected in the first quarter of 2024. The Plan Change 19 rules do not yet have legal effect, although resource consent decisions can have regard to any relevant objectives or policies.

Under Plan Change 19, 155 Dunstan Road is zoned Large Lot Residential. There are no objectives, policies or proposed rules relating to contaminated land or the remediation of contaminated land. Consistent with the Operative District Plan, the Plan Change 19 framework defers to the NESCS.

8.5.4 Overview

The Central Otago District Plan¹⁷ became operative on 1 April 2008. None of the subsequent plan changes are relevant to the site.

8.5.5 Assessment of Relevant Objectives, Policies and Rules

There are no objectives or policies specifically referring to remediation of contaminated sites in the District Plan. However, Chapter 7 'Residential Resource Area', Objective 7.1.1 and 7.1.2 generally relate to the proposed remediation works as the health and safety of residents will be enhanced and the adverse effects of the presence of soil contamination will be remedied. Furthermore Policy 7.2.3 relates to the preservation of environmental quality of the District's residential environment.

Under the District Plan Standards, specifically 7.3.6.(x), the excavation of material shall not exceed 1 metre in depth within 2 metres of any site boundary. The proposed excavation works are not expected to exceed 1 metre in depth, therefore the earthworks are considered a Permitted Activity.

8.6 Summary of Statutory Considerations

Remediation of the site by excavation and disposal of contaminated near surface soils, as outlined in this RAP, is consistent with the requirements of Part 2 of the RMA¹⁴ and the policy framework of the relevant statutory plans (i.e., the RPS¹⁵, the Waste Plan¹⁶ and the District Plan¹⁷).

Remediation Action Plan – 155 Dunstan Road, Alexandra

Resource consent is required from the ORC, according to Rule 5.6.1., as the remediation method results in a disturbance of land containing hazardous waste at a contaminated site¹⁶.

The proposed remediation method does not trigger the need for a land use consent under the NES⁴ or the District Plan¹⁷, and hence the proposed remediation method can be undertaken once the Environmental Engineering Manager has agreed to the remedial approach as part of the engineering approval process².

9 References

1. Insight Engineering 2017: Preliminary Environmental Site Investigation for proposed two lot subdivision at 155 Dunstan Road, Alexandra. Report reference: 17017
2. Insight Engineering 2023: Detailed Environmental Site Investigation for proposed subdivision at 155 Dunstan Road, Alexandra. Report reference: 23036
3. Central Otago District Council 2024: Resource Consent RC 230380.
4. Ministry for the Environment 2012: Users' Guide National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.
5. Ministry for the Environment 2021: Contaminated Land Management Guidelines No.1: Reporting on Contaminated Sites in New Zealand.
6. GNS Webmap Institute of Geological and Nuclear Sciences 2013: 1:250,000 Geology. Viewed at: <http://data.gns.cri.nz/geology/>
7. Otago Regional Council 2012: Alexandra Groundwater Basin Allocation Study.
8. Ministry for the Environment 2011: Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand.
9. US Environmental Protection Agency 1997: Recent Developments for In Situ Treatment of Metal Contaminated Soils. USEPA Contract Number: 68-W5-0055.
10. US Environmental Protection Agency 2009: Technology Performance Review: Selecting and Using Solidification / Stabilization Treatment for Site Remediation.
11. Contaminated Land: Applications in Real Environments 2007: Understanding Soil Washing, Technical bulletin TB13.
12. Ministry for the Environment 2002: A Guide to the Management of Cleanfills.
13. Standards New Zealand 1999: NZS 6803:1999 Acoustics – Construction Noise.
14. Ministry for the Environment 1991: Resource Management Act.
15. Otago Regional Council 1998: Regional Policy Statement for Otago.
16. Otago Regional Council 1997: Regional Plan: Waste for Otago.
17. Central Otago District Council 2008: Central Otago District Plan..

Remediation Action Plan – 155 Dunstan Road, Alexandra

10 Limitations

- i. We have prepared this report in accordance with the brief as provided. This report has been prepared for the use of our client, Navigate Property Limited, their professional advisers and the relevant Territorial Authorities in relation to the specified project brief described in this report. No liability is accepted for the use of any part of the report for any other purpose or by any other person or entity.
- ii. The recommendations in this report are based on the ground conditions indicated from published sources, site assessments and subsurface investigations described in this report based on accepted normal methods of site investigations. Only a limited amount of information has been collected to meet the specific financial and technical requirements of the client's brief and this report does not purport to completely describe all the site characteristics and properties. The nature and continuity of the ground between test locations has been inferred using experience and judgement and it should be appreciated that actual conditions could vary from the assumed model.
- iii. Subsurface conditions relevant to construction works should be assessed by contractors who can make their own interpretation of the factual data provided. They should perform any additional tests as necessary for their own purposes.
- iv. This Limitation should be read in conjunction with the IPENZ/ACENZ Standard Terms of Engagement.
- v. This report is not to be reproduced either wholly or in part without our prior written permission.

We trust that this information meets your current requirements. Please do not hesitate to contact the undersigned on 021 556 549 if you require any further information. The author is a Certified Environmental Practitioner (CEnvP) under the Environment Institute of Australia and New Zealand (EIANZ) accreditation system.

Report prepared by



Claude Midgley
Associate Environmental Scientist
CEnvP, MSc

Remediation Action Plan – 155 Dunstan Road, Alexandra

FIGURES

CCL Ref: 14925-160425-garden

16 April 2025

Shanon Garden
One Five Five Developments Limited



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P. 03 377 7010
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By e-mail only: shanon@navigateproperty.co.nz

Dear Shanon

155 Dunstan Road, Alexandra: Roading Design

Further to our various emails, this letter sets out an overarching design approach for the proposed roading and transportation infrastructure within the site, plus a review of how the plan produced by Studio 3 (received 28 February 2025) achieves these outcomes.

Introduction

The proposed site layout is shown below.



Figure 1: Proposed Site Layout (Extract from Studio 3 Drawing)

The site provides a total of 30 residential lots. We understand though that the Council has identified the potential for adjacent land to be developed at some future point in due course, and accordingly the design is cognisant of this (as discussed subsequently).

From a transportation perspective, the layout is characterised by a main spine road running through the site with a broadly east-west direction. This terminates at the eastern part of the site with a turning head.

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The Central Otago Rail Trail is located on the immediate western side of Dunstan Road opposite the site. We have previously produced a Transportation Assessment for this site, within which we noted that the Rail Trail provides a high-quality, off-road walking and cycling link that means non-car access can be gained to key community facilities including Molyneux Park, Dunstan High School, The Terrace primary school, Alexandra town centre, and two supermarkets. The Rail Trail also connects to a number of employment opportunities towards the south (for instance at Ngapara Street). As such, it can be expected that walking and cycling movements to/from the site will be higher than at other location, and the site seeks to recognise this (as discussed subsequently).

Current Rooding Environment

The District Plan classifies Dunstan Road as a Rural Arterial Road. On this basis, it is reasonable to conclude that the primary role of the road is to carry through traffic, with direct property access being limited. In the vicinity of the site, Dunstan Road is characterised by a straight and flat carriageway, with traffic lanes of 3.2m wide (each) and 0.3m wide sealed shoulders. The carriageway is marked with a centreline, edge lines and has marker posts on each side. There are swales on each side, with an approximate 7m wide verge.

The legal width of Dunstan Road is in the order of 20m, and the National Speed Limit Register records the speed limit at the site frontage of 80km/h. However the urban (50km/h) speed limit zone of Alexandra commences approximately 200m south of the location of the site access.



Photograph 1: Dunstan Road Looking South

The Central Otago Rail Trail lies to the immediate west of Dunstan Road and is separated from it by a landscaping strip of around 25m width. Other than the landscaping strip, there are no impediments to gaining access to the Rail Trail from Dunstan Road (and vice versa) and accordingly there is a network of informal routes through the landscaping area.



Photograph 2: Rail Trail Adjacent to Site (Dunstan Road on Left)

The Rail Trail provides a high-quality, off-road walking and cycling link that means non-car access can be easily gained between the site and key community facilities including Molyneux Park, Dunstan High School, The Terrace primary school, Alexandra town centre, and two supermarkets. The Rail Trail also connects to a number of employment opportunities towards the south (for instance at Ngapara Street). As such, we expect that walking and cycling movements to/from the site will be higher than at other locations.

According to the MobileRoad website, Dunstan Road carries 1,900 vehicles per day (two-way). A road typically carries around 10% of its daily traffic flows in the peak hours, which suggests that the peak hour traffic flows on Dunstan Road are around 190 vehicles per hour (two-way).

We have reviewed the New Zealand Transport Agency Crash Analysis System and have not identified any underlying adverse road safety concerns on this part of the roading network.

Background to Site Assessment

We understand that Central Otago District Council is presently reviewing its Land Development and Subdivision Engineering Code of Practice. The current version is based on the 2004 version of the overarching Standard NZS4404, and the new version is to be based on the 2020 version¹. We also understand that discussions with the Council have identified that a design to meet the 2020 version of the Standard is sought, and this review is based on this approach.

This version of the Standard also references the Austroads Guides to Road Design and Traffic Management. Accordingly, we have made reference to these also, as appropriate.

¹ Stated on the Council website <https://www.codc.govt.nz/services/planning/land-development-and-subdivision-engineering> accessed on 16 April 2025



Compliance with Land Development and Subdivision Infrastructure

Paragraph 3.2.4: Place and Link Context

The location of the site means that it is classified as a suburban area and with the road being used for 'live and play' purposes. As a Local Road, it can be expected that vehicular traffic has a lesser priority than the needs of residents on the road with "low vehicle speeds, pedestrian and local amenity values" predominate. For the reasons set out below, it is considered that the transportation networks achieve this.

Paragraph 3.2.5: Network Connectivity

Network connectivity is expected to result in short travel distances, and the proposed development plan means that an almost linear route is provided for residents to exit the site onto Dunstan Road. Although the development pattern means that the spine road provides the only route option, this is designed to support travel choice with an off-road shared walking and cycling route provided along the northern side of the westernmost 140m of the spine road. This is anticipated to provide a high-quality connection to the Rail Trail.

Within a suburban development it is expected that a Collector or Arterial Road is within 400m. In this instance the spine road is around 350m in length, and consequently only the easternmost four lots lie outside this 400m distance. However the route between these lots and Dunstan Road is direct, meaning that network connectivity for these lots is optimised to the maximum extent practical, as required.

We have considered the form of the Dunstan Road / Ste Access intersection in respect of the connections to the existing transportation networks.

Traffic generated by residential developments is known to vary for a variety of reasons, with one such reason being the proximity (or otherwise) to employment and community facilities. Where a dwelling is some distance from these types of facilities, the traffic generation rates tend to be lower than for residences that are closer due to 'trip chaining', that is, the tendency of a resident to carry out multiple visits to different destinations during the same trip away from the dwelling.

In this case, we consider it is likely that traffic will be associated with employment locations in Alexandra or further afield in Cromwell, and there is also likely to be travel to schools in Alexandra. As Alexandra is only around 1.5km away, for this analysis we have used a rate of 1 vehicle movement per residence in each of the peak hours has been used. Thus the proposal can be expected to generate peak hour traffic volumes of 30 vehicle movements (two-way).

In the morning peak hour, 85% of these vehicles are likely to be exiting the site, with 65% of the generated vehicle movements entering the site in the evening peak hour.

With regard to the distribution of these vehicles, we anticipate that the vast majority will be associated with travel to/from Alexandra and therefore where relevant, an allowance has been made for 90% of vehicles to travel to/from the south.

We have assessed the performance of the Dunstan Road / Spine Road intersection and found that with a simple priority ('give-way') layout with a single traffic lane on each approach would provide Level of Service A (the best available) with low queues and delays. That is, the capacity of the intersection will not give rise to efficiency concerns or poor network connectivity. The Austroads Guide to Traffic Management Part 6 ('Intersections, Interchanges and Crossing Management') sets out warrants for when auxiliary turning lanes are required at an intersection, and the traffic flows are such that such lanes are not warranted.



Note that the traffic flow was not changed in this scenario, just the number of pedestrian movements and the length of the crossing. This showed that Level of Service D overall would be provided (Level of Service B for perceived delay and Level of Service D for perceived safety). This is a lower ('worse') level of service than the prevailing situation.

Finally we changed the traffic flows to reflect the expected development, adding a further 30 vehicles (two-way) in the peak hours onto the prevailing traffic. This also showed that Level of Service D overall would be provided (Level of Service B for perceived delay and Level of Service D for perceived safety). In other words, it is the extra crossing width that a pedestrian needs to negotiate (due to the localised widening associated with site access) that is the main determinant of the level of service, and not the extent of the increase in traffic volume.

We then considered the outcomes if a pedestrian refuge was to be put in place. This typically creates benefits for pedestrians by allowing them to cross the road in two movements (that is, the length of each crossing reduces). One approach commonly used is for an auxiliary right-turn lane to be introduced, which then creates roadspace to the immediate north of this lane to put a refuge in place. One further advantage of this approach is that the widening required under Figure 12.3 above is not required on the western side of Dunstan Road, because a turning vehicle can move into the auxiliary lane and through traffic can remain in the main northbound movement lane. This in turn means that the crossing distance can reduce. With a 3m wide crossing and a crossing distance of 4m on either side, Level of Service B overall would be provided (Level of Service B for both perceived delay and perceived safety).

Taking these matters into account, we consider that there is a strong case that some form of formal pedestrian crossing should be put in place on Dunstan Road. Importantly though, with regard to the location of the crossing, we are cognisant that the wider area has been rezoned through Plan Change 19, which will in due course mean that pedestrian crossing movements are introduced over an extended distance (as the rezonings extend over a total length of 1.6km of Dunstan Road). With this in mind, we are of the view that a holistic approach for road crossing provision on the road is required. In other words, the provision for pedestrian crossing movements should not be ad hoc and introduced on a site-by-site basis, but should be part of a wider coordinated approach with crossings put in place in the locations where pedestrians will find them convenient while also presenting a consistent roading environment for all road users. This may mean that some sites have a pedestrian crossing immediately adjacent to them, whereas others will provide a footpath (or shared route) at their Dunstan Road site frontage to connect to a crossing location.

There are no particular constraints to implementing pedestrian crossings on Dunstan Road due to the flat and straight alignment. However taking into account a Safe System approach, the potential for serious injuries or a fatality associated with a motorised vehicle striking a pedestrian at 80km/h are considerably greater than at a speed of 50km/h. We note that the current 50km/h speed limit commences just 200m south of the proposed Dunstan Road / Spine Road intersection, and thus extending this to just north of the site access would not be an unreasonable solution in our view, pending further evaluation of the wider road crossing strategy for this area.

Paragraph 3.2.6: Design and Access Statement

This letter has been prepared to respond to this requirement. We note that no detailed assessment is included regarding the effects on the wider transportation networks as this was addressed in detail within the Transportation Assessment we produced previously.



Paragraph 3.3.1: Design Requirements

Overview

The plans provided show the following:

- Spine Road (west):
 - 14.4m to 16.5m legal width
 - 6.0m wide carriageway
 - 3.0m shared walking and cycling route
 - No parking lanes
- Spine Road (east):
 - 20m legal width
 - 6m wide carriageway
 - Two 1.5m footpaths
 - Two 2.5m parking lanes (but intermittent)
- Rights-of-Way:
 - 6m legal width
 - 3.0m carriageway
 - No footpath
 - No parking lane

Under Standard NZS4404:2010, there are three relevant road types:

- Road Type E12 (serving 21 to 200 residences):
 - 15m legal width
 - 5.5m to 5.7m wide carriageway
 - Two 1.5m footpaths
 - No parking lane
- Road Type E11 (serving 7 to 20 residences):
 - 9m legal width
 - 5.5m to 5.7m wide carriageway
 - No footpaths
 - No parking lane
- Road Type E10 (serving up to 6 residences):
 - 4.5m legal width
 - 2.75m to 3.0m wide carriageway
 - No footpaths
 - No parking lane

One particular difficulty with the Standard is that very clear distinctions are provided with regard to the typical number of residences served. In practice though, a road serving (say) 21 residences would not need to be designed to a cross section capable of accommodating the traffic from 200 residences, as this would be a significant over-design of the infrastructure. Accordingly, a degree of engineering judgement is required.

Spine Road (West)

The western section of the spine road meets the expected legal width of Road Type E12 over much of its length, but is constrained over a distance of 35m to the immediate west of the curve in the spine road. This arises because the northern and southern boundaries of the access leg are not parallel, but rather they taper slightly towards the east. The difference from the expected legal width is just 0.65m and we do not consider that this will give rise to any concerns or issues in practice.



No parking lane is provided, but we do not expect that there will be parking demand in this location due to the absence of frontage properties.

It would be possible to provide two 1.5m footpaths, but the design seeks instead to provide one 3m wide shared walking and cycling route. We consider that this provides a better outcome in two ways. Firstly it means that on the busiest section of the spine road, cyclists are physically separated from moving traffic which will therefore encourage use of this mode. Secondly, it means that pedestrians and cyclists are focussed in one location at the western end of the spine road, which then makes it easier to ensure that they are provided with a safe and appropriate crossing of Dunstan Road. Overall then, we support this deviation from the Standard.

The Austroads Guide to Road Design Part 6A (Paths for Walking and Cycling) sets out that for a Local Access Shared Path, a width of 2.0m to 3.0m is anticipated, and the upper width is achieved. The shared route is separated from the movement lane by 1.5m, but with no measure to prevent vehicles from entering onto the pathway. Provided that traffic speeds are low, we do not consider that this will present a safety hazard but we also note that the installation of a low kerb or a fence alongside the share path could be included within the design (and we note that the Council has also raised the need for some form of physical separation between cyclists and motorised traffic). Given that this is easily included in the design, we consider it is a matters that can be addressed when engineering approvals are sought.

For any suburban road, the Standard expects that the carriageway is constructed with kerb+channel but the proposed cross section includes swales. We understand that this approach is proposed in order to maintain a rural 'feel' upon entering the site and to assist with stormwater disposal. From a transportation perspective, there are no reasons why this should present any efficiency or safety issues, but we note that under these circumstances, a sealed shoulder would typically be expected but none is provided. The purpose of the shoulder is largely to support the edge of the seal and prevent it from gradually sliding into the adjacent swale, but the plans show that this is proposed to be achieved through a physical restraint at the edge of the seal (we are aware that concrete beams inset into the roadway have been used for this type of arrangement previously).

Spine Road (East)

The westernmost section of the spine road passes through two slight curves and we confirm that seal widening is shown in this location such that an 8m truck (that is, a refuse truck or fire truck) is able to pass a B99 car travelling in the opposite direction. This location is also where the shared route starts and terminates, and accordingly formal signage and markings will be required in this location so that cyclists are able to move to and from the carriageway immediately east. The detailed design of this has not yet been undertaken, but there is sufficient legal width provided in this location such that an appropriate design can be achieved.

The spine road to the immediate east of this location will carry the traffic associated with 25 lots and therefore could be designed to meet either Road Type E11 or E12. The proposal achieves the expected minimum carriageway width and provides two footpaths as required, but the legal width is 20m (5m to 11m wider than needed to meet the Standard) and indented parking bays are proposed (whereas parking within the movement lane is expected under the Standard). We understand that the wider legal road reserve is proposed in order to provide a higher level of amenity to residents through allowing for a greater degree of landscaping within the road reserve (and in this regard we note that greater legal widths are not prohibited under the Standard).

Indented parking bays are provided because the general site layout relies on access to a number of lots being achieved via accesses. These are insufficiently wide to accommodate on-street parking (such as for visitors) and therefore parking demand will occur on the spine road. This being the case,



the design approach has been to meet this demand outside the movement lanes (rather than within, as the Standard permits). The rationale for this is to ensure that on-street parking occurs in specified areas rather than in a more ad hoc fashion, and without the need for parking restrictions. Again, the Standard does not prohibit parking from being provided in this manner.

Accesses

The accesses meet Road Type E10 of the Standard. As they provide a single lane only, a passing place is provided just north of the spine road so that a vehicle that has turned into an access is able to wait for another vehicle to exit if necessary (and without blocking the footpath). The easternmost and westernmost accesses are longer than 50m and under the Standard a passing place is required every 50m. This is achieved at both of these locations, such that the distance between passing places is no more than 40m.

Paragraph 3.3.2.2: Sight Distance

The alignment of Dunstan Road is flat and straight, meaning the sight distances for all road users at the Dunstan Road / Spine Road intersection are excellent.

The straight alignment of the spine road also means that appropriate sight distances can be provided at each of the proposed accesses.

Paragraph 3.3.2.3: Widening on Horizontal Curves

As noted above, widening has been provided at the left-right curve on the spine road to allow for an 8m truck to pass a B99 car.

Paragraph 3.3.5: Target Operating Speed

Standard NZS4404 expects operating speeds of at most 40km/h on the spine road. While physical measures to achieve this form one part of the design solution, it is also imperative that a 40km/h posted speed limit is put in place. Our assessment of operating speeds is carried out on that basis.

According to the Austroads Guide to Road Design Part 3 ('Geometric Design'), a car can accelerate by 1km/h for every 5m of travel (paragraph 3.6.3). Allowing for a vehicle to turn into the spine road at a speed of 25km/h, it could reach 40km/h at a distance of 75m from Dunstan Road. At 95m from Dunstan Road, the left-right curves mean that a driver would only be able to see for a distance of 120m ahead, and Figure 3.2 of the Standard indicates that this means that their speed would be limited to 40km/h. Thus if there is a slight exceedance of the 40km/h speed limit in this location then it will only occur over a short distance, but closer to the curves, the sight distance reduces to a minimum of 80m and thus a speed of around 34km/h can be expected.

As a driver passes through the second of the curves, the sight distance available increases to around 200m which means drivers can be expected to accelerate. Applying the same acceleration rate of 1km/h per 5m of travel, vehicles would reach 40km/h in 30m (approximately the location of the access to Lots 6 to 9). Vehicles can then be expected to accelerate to a theoretical 65km/h before having to commence braking for the end of the spine road. In practice, drivers would be unlikely to accelerate to this extent but it demonstrates that the road design would not restrict drivers to the expected operating speed. There will be some degree of side friction due to parked vehicles, but overall we consider that traffic calming measures will be required in order to ensure speeds do not exceed 40km/h.

The plans presently do not show any traffic calming, rather, a different surface treatment is proposed with block paving proposed at two of the access intersections. Such treatments do not



reduce traffic speeds by more than 5km/h, and therefore will not serve to ensure that the 40km/h operating speed is achieved. We are also mindful that the location of the termination of the shared route will act as a focus for pedestrians and cyclists to cross the road, and a slower speed environment in this location would be advantageous in supporting a safe environment. Accordingly we recommend that the spine road / access to Lots 6-9 and the spine road / access to Lots 10-13 vehicle crossings are constructed as speed tables. Allowing for an operating speed of 25km/h at these locations, this will ensure that the expected 40km/h operating speed is not exceeded.

Drivers will have to cross a kerb when entering or exiting an access, which will ensure that they travel at slow speeds. The accesses have a constrained width and a limited length, and this provides little opportunity for any acceleration between the vehicle crossing and the lot access. Accordingly we consider that the accesses will operate at the anticipated 10km/h operating speed.

Paragraph 3.3.6: Passing, Parking and Loading

Passing bays are shown on the two longest accesses, and are 6.1m long and 2.5m wide with a total formed width of 6m. They are therefore suitable to accommodate a car.

The Standard does not set out an appropriate number of on-street parking spaces. The RTA Guide to Trip Generating Developments suggests that a rate of 1 space per 5 lots is appropriate but we are aware that different road controlling authorities have different approaches. For example, the Queenstown Lakes Code of Practice sets out that 1 on-street space per lot should be provided “*where practical*” whereas Waimakariri Council requires 1 space per 3 lots. In this case 22 spaces are provided for 30 lots, equating to a ratio of 0.73 spaces per residence, which we consider will easily meet demand.

Paragraph 3.3.7: Intersection and Alignment Design

The spine road meets Dunstan Road at 90-degrees (+/- 20 degrees) as permitted.

There are no internal intersections as the accesses are constructed with vehicle crossings, as is the appropriate design treatment. Corner splays are not provided at the lots adjacent to the accesses, but as the footpath is set back by 3.5m from the property boundary, this does not adversely affect sight distances.

Paragraph 3.3.8: No-Exit Roads

The site includes a cul-de-sac (the spine road) and this is terminated with a turning head with a 19m diameter, as appropriate under Figure 3.3 of the Standard for a residential area.

Paragraph 3.3.9: Bus Stops

No bus stop provision is required as the spine road will be a Local Road.

Paragraph 3.3.11: Footpaths, Accessways, Cycle Paths, and Berms

Matters relating to dimensions are set out above, but in essence the provision proposed exceeds the minima of the Standard.

Paragraph 3.3.12: Traffic Signs, Marking, and Road Furniture

These provisions can be achieved, and we expect this will occur through engineering approvals.



Paragraph 3.3.13: Trees and Landscaping

These provisions can be achieved, and we expect this will occur through engineering approvals.

Paragraph 3.3.14: Road Lighting

These provisions can be achieved, and we expect this will occur through engineering approvals.

Paragraph 3.3.16: Private ways, private roads, and other private accesses

The layout includes five accesses, and each meets the Standard (as discussed above).

The Standard requires that where an access serves three or more rear lots, a turning facility is required for cars at the end. However none of the accesses provide a turning head. The need for a turning head is not explained within the Standard, nor the reason for this being set at such a low threshold. However it is intuitive that residents will turn into their own driveways, and thus the only other cars present will be associated with visitors. In this case though the number of such vehicles will be limited because the intersections of the accesses with the spine road are proposed to be constructed as vehicle crossings rather than as 'intersections', meaning that their appearance will dissuade drivers from speculatively entering them. Additionally, no on-street parking is available on the accesses. However we also recommend that signage is installed at the entry to each access displaying "residents only" or similar.

Paragraph 3.3.17: Crossings

Vehicle crossings are shown where appropriate (such as at the accesses). In other cases the crossing location will be determined at a later time.

Future-Proofing

If land to the north is developed in future for residential activity, then it is straightforward for any internal roading to link to the western section of the spine road with the formation of a new priority tee-intersection. Any development to the south could also tee-in to the spine road, but additionally, one lot within the site has been set aside as a potential roading, as illustratively shown below.

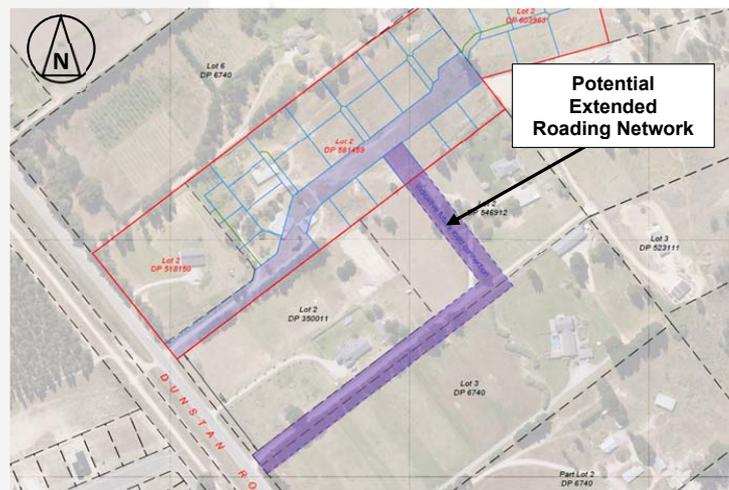


Figure 3: Potential Expansion of Roading Network (Extract from Calder Surveying Drawing)



We stress that at the current time there is no proposal for development to the north and south – the commentary above is simply to show that the proposed site layout does not foreclose the opportunity to provide connectivity to those sites at some future time.

Summary

On the basis of our assessment, we consider that the proposed site layout largely achieves the anticipated outcomes of Standard NZS4404:2010. The matters where the proposed layout does not achieve the expected provision of the Standard are:

- Paragraph 3.2.5: Network Connectivity
 - The eastern part of the site lies more than 400m from the nearest Collector/Arterial Road, but the route is optimised to the maximum extent possible.
- Paragraph 3.3.1: Design Requirements
 - The section of the spine road just west of the two curves has a legal width that is 0.6m less than expected under the Standard. However this small difference is unlikely to result in adverse effects.
 - The western section of the spine road provides a 3m wide shared walking and cycling route rather than two 1.5m footpaths. This is to encourage the use of cycling in view of the proximity of the Rail Trail and provides a higher level of service than just providing footpaths.
 - The western section of the spine road is constructed without kerbs but the proposal is for the edge of the carriageway to be supported by other means.
 - Any additional physical means of separation between motorised vehicles and the shared walking/cycling lane can be addressed when engineering approvals are sought.
- Paragraph 3.3.16: Private ways, private roads, and other private accesses
 - No turning facility is provided at the ends of the accesses but it is not considered that this will give rise to adverse effects provided that only residents use them, and to that end, it is recommended that signage is installed at the entry to each access displaying “*residents only*” or similar.

In addition we note that:

- Traffic calming is required on the spine road to ensure that it operates within the expected operating speed of the Standard;
- No information has been provided in respect of road or access gradients and so we make no comment on this; and
- Road markings will be needed in due course, but this can be addressed when engineering approvals are sought.

The layout also provides for future connectivity to sites to the north and south as required.

A formal layout for the intersection of the spine road with Dunstan Road is yet to be produced, but we consider that:

- The Dunstan Road / Spine Road intersection can be designed to meet current standards and guides, and the traffic flows are such that efficiency/capacity issues are highly unlikely to arise;
- Provision should be made for pedestrians and cyclist to cross Dunstan Road in order to support the use of non-car modes of transport via the Rail Trail, and also reduce the need to travel by private car;



- The flat and straight alignment of Dunstan Road means that there are a range of locations where pedestrian crossings could be installed;
- Due to the extent of rezoned land in this area, in our view road crossing opportunities should not be ad hoc but developed in a coordinated and strategic way, with crossings located on pedestrian desire lines. This will mean that some sites have adjacent (formal) pedestrian crossings whereas others have footpaths across their site frontage that connect to pedestrian crossings elsewhere; and
- Irrespective of the provision made, we consider that due to the potential risk of serious injury to a crossing pedestrian or cyclist if they were to be struck by a motorised vehicle, the speed limit on this section of Dunstan Road should be reduced through the extension of the current 50km/h speed limit area northwards. Extending the speed limit just 200m north of its current position would encompass the proposed site access intersection, and this would not be an unreasonable solution in our view pending further evaluation of the wider road crossing strategy for this area.

Overall, and subject to the comments above, we do not consider that there will be any adverse roading efficiency or road safety outcomes from progressing the proposed site layout.

Please do not hesitate to contact me if you require any further information in respect of the above, or clarification of any issues.

Kind regards

Carriageway Consulting Limited

Andy Carr

Traffic Engineer | Director

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20 August 2024

Central Otago District Council
PO Box 122
Alexandra 9340
Attention: Tanya Copeland

By email: tanya.copeland@codc.govt.nz

Dear Tanya

155 Dunstan Rd – Application of operative and proposed zoning rules

1. We act for One Five Five Developments LP (**Applicant**) in respect of its application for the subdivision of 155 Dunstan Road (**application**).
2. This letter responds to a matter you have raised in discussion with Shanon Garden relating to the processing of the application. Specifically, you noted some uncertainty about processing the application, the zoning rules that would apply, and the weighting to be given to the Operative District Plan (**ODP**) and Plan Change 19 (**PC19**).
3. Shanon understood from that discussion that you thought the application would still need to be considered predominantly under the rural zoning in effect prior to the PC19. Shanon has asked us to provide our opinion on this matter.
4. We consider the assessment of the application should be made with greater weight afforded to the PC19 decisions on submissions provisions (Large Lot Residential (**LLRZ**)), than the Rural Resource Area (**RRA**) provisions, for the reasons set out below.
5. In terms of the facts applying to the site, we note:
 - (a) PC19 as notified proposed a change in zoning of the site from RRA (Rural Residential requiring a 2ha average) to LLRZ (1500m²).
 - (b) The Applicant submitted in opposition, seeking instead that the site be rezoned to Low Density Residential (**LRZ**) or LLRZ (Precinct 1).
 - (c) Council adopted the hearing panel recommendations on PC19, concluding that the site should remain LLRZ as notified, but that a comprehensive residential development framework be able to be applied in the LLRZ.

1

- (d) That decision has been appealed by the Applicant, seeking the site be rezoned to LRZ. The Applicant has not appealed the comprehensive residential development rule.
6. No appeals have been made seeking the site or wider LLRZ area along Dunstan Road be reverted to RRA (or any zoning which results in a residential density less than 1500m²). The only available options for the future zoning of the site are either retention of LLRZ, an upzoning to LRZ, or a zoning outcome that equates to effects in the range somewhere between those two options, such as LLRZ (Precinct 1). There is no scope for the possibility that zoning will go 'backwards' to RRA.
 7. Section 104 of the RMA (processing of applications for consent) is to be read in light of ss 86B and 86F. Under s 86B, rules have legal effect on and from the date of PC19 decisions. Under s 86F, the ODP rules also have legal effect, due to appeals on the PC19 being yet to be determined. However, as there are no appeals (and there were no submissions) seeking the retention of RRA for the site, those ODP rules and their corresponding objectives and policies are to be given no weight in a s 104 assessment because that zoning is no longer a possible outcome for the site.
 8. Instead, full weight should be placed upon the PC19 objectives, policies, and rules. This is because there has already been a full hearing as to the submissions which had been made for a rezoning of the site to LLRZ. The Commissioners heard detailed submissions from planners on the rezoning options. The Commissioners' recommendations were then implemented through the rezoning decision and notification of that decision.
 9. As noted above, there is no scope available through any appeals on PC19 that raise the potential for the site to revert to RRA or a less intensive residential density than the PC19 provisions. If the Council were to place weight on previous RRA provisions in this instance, and not have regard to the fact there is no legal way of resorting back to those, that would likely be a failure to into account a relevant matter and an error of law.¹
 10. We also note for completeness, that if there are any rules which, as a result of decisions on PC19, have become more restrictive to the site, s 88A of the RMA (which provides that the activity status remains the same) acts only as a 'shield' to protect an applicant from a more onerous activity status applying. The reverse does not apply where rules become more lenient (as a result of zoning or otherwise).²

¹ *Knowles v Queenstown Lakes District Council* [2019] NZHC 3227.

² *Re Waiheke Marinas Ltd* [2015] NZEnvC 218.

Yours faithfully
TODD & WALKER LAW



Rosie Hill
Senior Associate
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Matter ID: 14894



Ben Gresson
Senior Associate
Email: ben@toddandwalker.com



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**



R. W. Muir
Registrar-General
of Land

Identifier **1182384**
Land Registration District **Otago**
Date Issued 30 October 2024

Prior References
1084428 397960

Estate Fee Simple
Area 4.1321 hectares more or less
Legal Description Lot 2 Deposited Plan 581459 and Lot 2
Deposited Plan 603963

Registered Owners
Glenoir LP

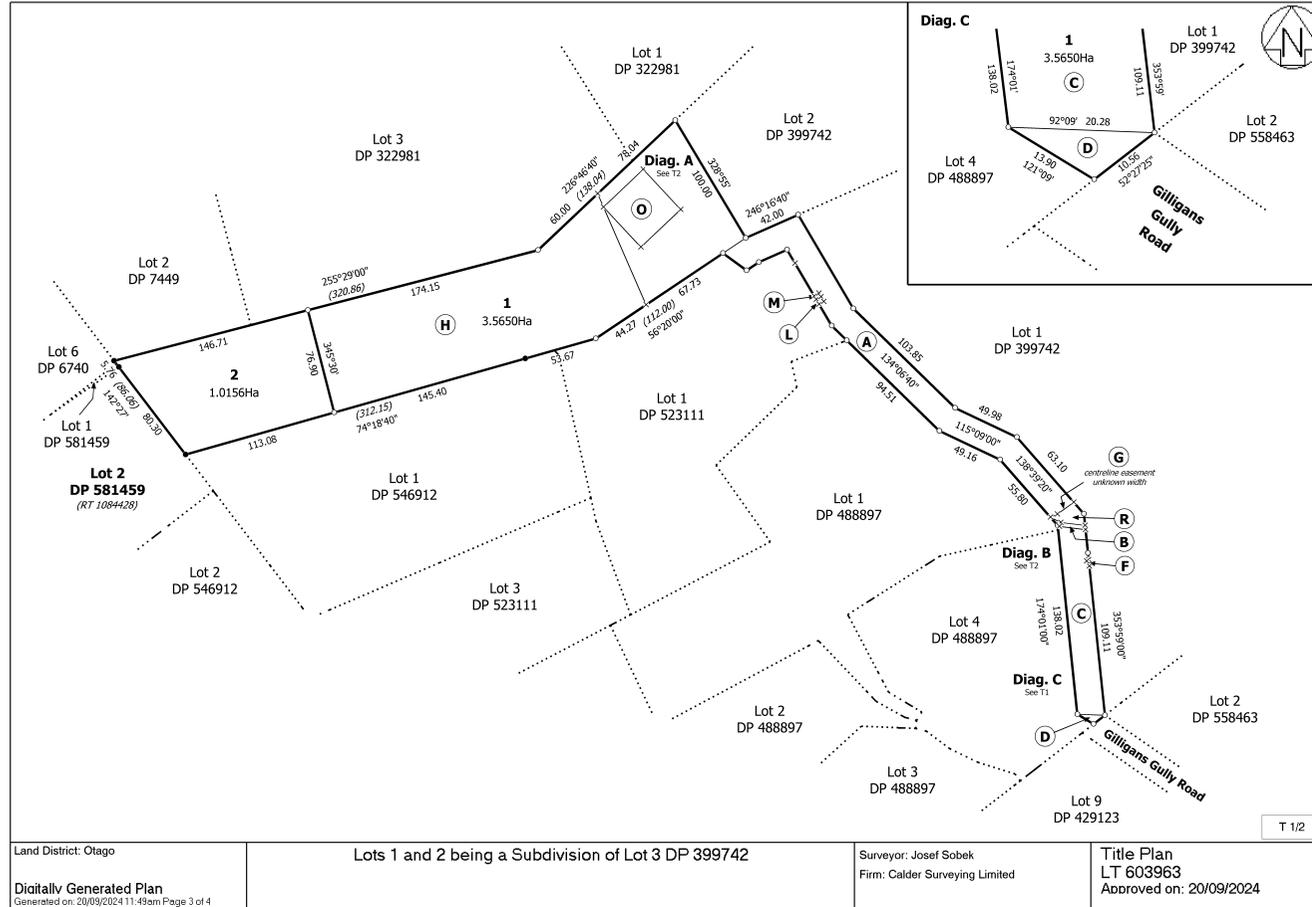
Interests

Subject to Section 315 Land Act 1924 (Affects Lot 2 DP 603963)
Subject to Section 206 Land Act 1924 (Affects Lot 2 DP 603963)
Appurtenant to Lot 2 DP 603963 is a right of way and a right to convey water and electricity created by Easement Instrument 6231576.2 - 29.11.2004 at 9:00 am
Some of the easements created by Easement Instrument 6231576.2 are subject to Section 243 (a) Resource Management Act 1991 (See DP 326040)
Appurtenant to Lot 2 DP 603963 is a right to convey water created by Easement Instrument 6231576.3 - 29.11.2004 at 9:00 am
Land Covenant in Easement Instrument 7776219.1 - 8.4.2008 at 9:00 am (Affects Lot 2 DP 603963)
Appurtenant to Lot 2 DP 603963 is a right to store water created by Easement Instrument 7946756.7 - 25.9.2008 at 9:00 am
The easements created by Easement Instrument 7946756.7 are subject to Section 243 (a) Resource Management Act 1991
Appurtenant to Lot 2 DP 603963 is a right to convey water and electricity created by Easement Instrument 7946756.8 - 25.9.2008 at 9:00 am
Some of the easements created by Easement Instrument 7946756.8 are subject to Section 243 (a) Resource Management Act 1991 (See DP 399742)
Land Covenant in Easement Instrument 7946756.9 - 25.9.2008 at 9:00 am (Affects Lot 2 DP 603963)
Subject to a right to convey electricity (in gross) over part Lot 2 DP 581459 marked A on DP 581459 in favour of Aurora Energy Limited created by Easement Instrument 11242025.7 - 11.2.2019 at 4:50 pm
The easements created by Easement Instrument 11242025.7 are subject to Section 243 (a) Resource Management Act 1991
Subject to a right to convey and transform electricity (in gross) over part Lot 2 DP 541459 marked A on DP 584896 in favour of Aurora Energy Limited created by Easement Instrument 12640073.2 - 2.3.2023 at 9:16 am
Subject to Section 241(2) Resource Management Act 1991 (affects DP 603963)
13200339.5 Mortgage to Killarney Capital Limited - 31.1.2025 at 3:30 pm

Transaction ID 5486510
Client Reference

Search Copy Dated 17/04/25 10:42 am, Page 2 of 3
Register Only

Identifier
1182384





**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R.W. Muir
Registrar-General
of Land

Identifier 811352
Land Registration District Otago
Date Issued 11 February 2019

Prior References
OT4C/196

Estate Fee Simple
Area 1.0138 hectares more or less
Legal Description Lot 2 Deposited Plan 518150
Registered Owners
Glenoir LP

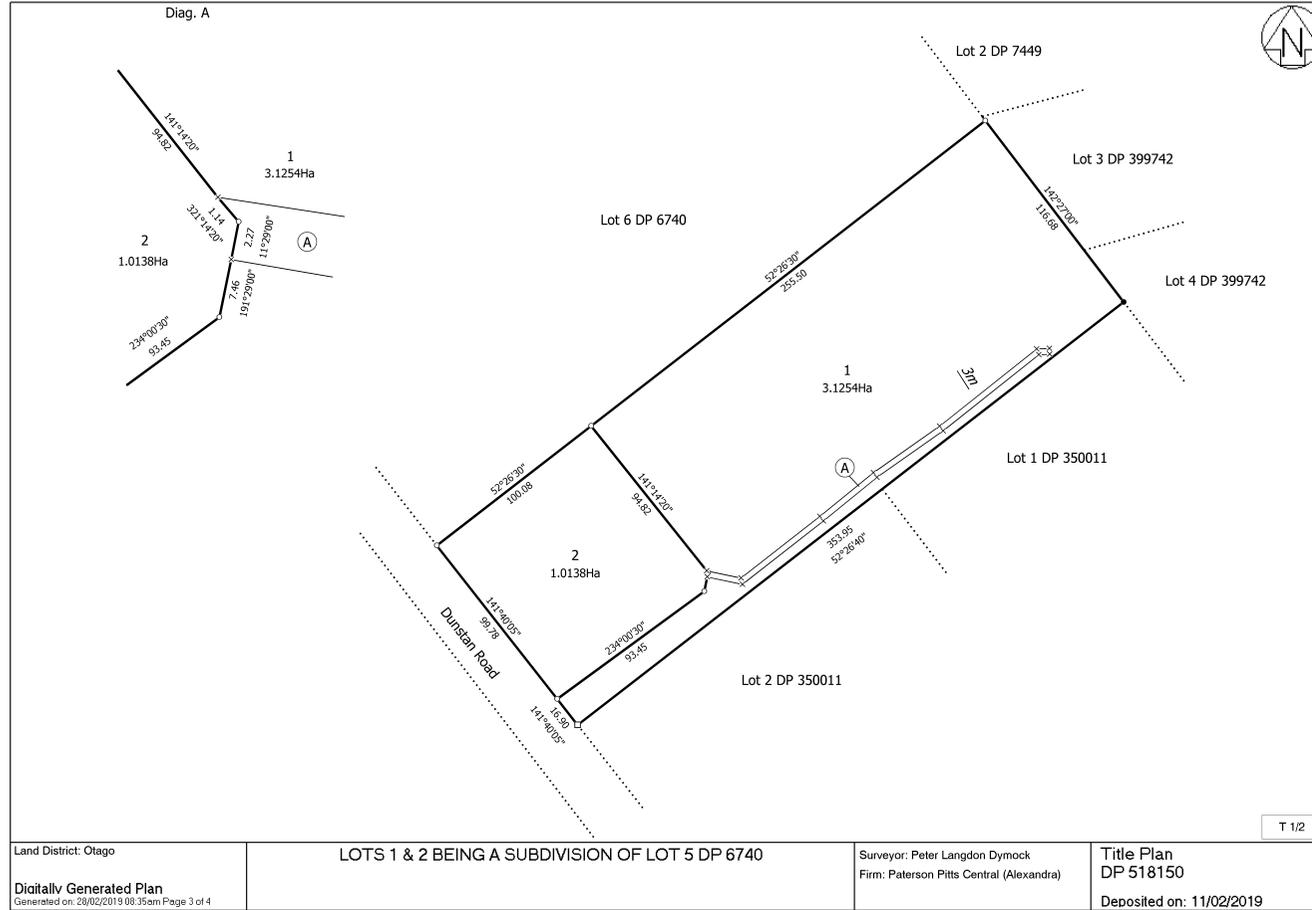
Interests

11242025.6 Consent Notice pursuant to Section 221 Resource Management Act 1991 - 11.2.2019 at 4:50 pm
13200339.5 Mortgage to Killarney Capital Limited - 31.1.2025 at 3:30 pm

Transaction ID 4988670
Client Reference

Search Copy Dated 19/02/25 1:36 pm, Page 2 of 3
Register Only

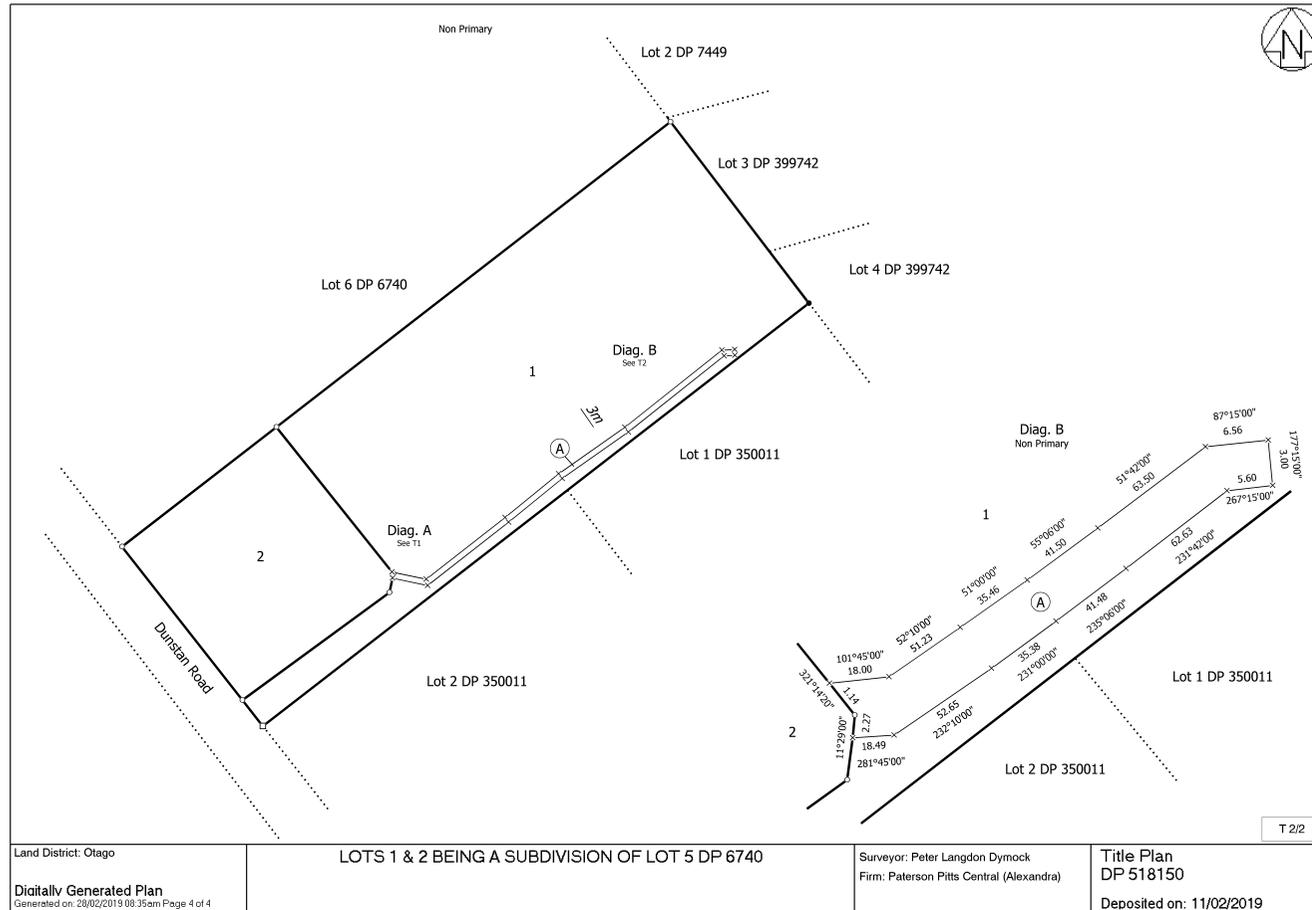
Identifier
811352



Transaction ID 4988670
Client Reference

Search Copy Dated 19/02/25 1:36 pm, Page 3 of 3
Register Only

Identifier
811352



View Instrument Details



Instrument No 11242025.6
Status Registered
Date & Time Lodged 11 February 2019 16:50
Lodged By Tohill, Rosemary Kaye
Instrument Type Consent Notice under s221(4)(a) Resource Management Act 1991



Affected Records of Title	Land District
811352	Otago

Annexure Schedule: Contains 6 Pages.

Signature

Signed by Kieran Edward Tohill as Territorial Authority Representative on 26/02/2019 02:47 PM

*** End of Report ***

Annexure Schedule: Page:1 of 6

IN THE MATTER of Lots 1 & 2 DP 518150 being a subdivision of
Lot 5 DP 6740, RT OT4C/196

AND

IN THE MATTER of resource consent RC 170326 from the Central Otago
District Council to subdivide the above land.

CONSENT NOTICE PURSUANT
TO SECTION 221 OF THE
RESOURCE MANAGEMENT ACT 1991

PATERSON PITTS LIMITED PARTNERSHIP
P O Box 84
CROMWELL

In accordance with a condition of resource consent RC 170326 of the Central Otago District Council granted pursuant to Section 104 and 104C of the Resource Management Act 1991 dated 19 September 2017, as varied pursuant to Sect 127 RMA91, the following conditions are to be imposed on an ongoing basis by a consent notice to be registered against the certificate of title for Lot 2.

Water

5.
 - a) *At the time a dwelling is erected on Lot 2, point of use treatment by means outlined in the laboratory report attached to this notice, or other solutions acceptable to the Chief Executive, shall be provided if such action is necessary to achieve full compliance with the Drinking Water Standards for New Zealand 2005 (Revised 2008). The water shall as a minimum requirement, achieve full compliance with all Maximum Allowable Values (MAVs) as detailed in the laboratory report and the lot owner shall be aware of any exceedance of the Guideline Values (GVs) for which additional treatment is strongly recommended.*
 - b) *A certificate shall be obtained from the supplier of the treatment equipment from a suitably qualified person confirming that the system operated in accordance with the operating and maintenance procedures, will supply water suitable for human consumption in compliance with Drinking Water Standards for New Zealand 2005 (revised 2008).*
 - c) *A copy of the suppliers' certificate and the operating and maintenance instructions for the treatment equipment shall be lodged with the Chief Executive.*
 - d) *The treatment equipment shall be properly maintained and operated by the lot owner in accordance with the operating and maintenance procedures.*
7.
 - a) *At the time the residential activity (new dwelling) is constructed on Lot 2, domestic water and firefighting storage is to be provided by a standard 30,000 litre tank. Of this total capacity, a minimum of 20,000 litres shall be maintained at all times as a static firefighting reserve. Alternatively, an 11,000 litre fire fighting reserve is to be made available to the building in association with a domestic sprinkler system installed in the building to an approved standard. A firefighting connection is to be located within 90 metres of any proposed building on the site. In order to ensure that connections are compatible with New Zealand Fire Service equipment the fittings are to comply with the following standards:*
 - i) *Either: 70mm Instantaneous Couplings (Female) NZS 4505, or 100mm Suction Couplings (Female) NZS (hose tail*

is to be the same diameter as the threaded coupling e.g. 100mm coupling has 100mm hose tail) provided that the consent holder shall provide written confirmation from the New Zealand Fire Service to the Chief Executive to confirm that the couplings are appropriate for firefighting purposes.

- ii) The connection shall have a hardstand area adjacent to it to allow a New Zealand Fire Service appliance to park on it. The hardstand area shall be located at the centre of a clear working space with a minimum width of 4.5 metres.
Access shall be maintained at all times to the hardstand area.
- b) Firefighting water supply may be provided by means other than that provided for above if the written approval of the New Zealand Fire Service is obtained for the proposed method and that approval is submitted to the Chief Executive.

Note: For more information on how to comply with Condition 6 and 7 or on how to provide for NZFS operational requirements refer to the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 retrieved from -

<http://www.fire.org.nz/CM?media/pdf/ds51e706c1bc49c14440cc1e83f09964.pdf>. In particular, the following should be noted:

- For more information on suction sources see Appendix B, SNZ PAS 4509:2008, Section B2.
- For more information on flooded sources see Appendix B, SNZ PAS 4509:2008, Section B3.

Wastewater

- 9. a) At the time that a new dwelling is constructed on Lot 2, an on-site wastewater disposal system that complies with the requirements of AS/NZ 1547:2012 On-site Domestic Wastewater Management shall be designed by a suitably qualified professional.
- b) Construction shall not commence on the dwelling until the design of the on-site wastewater disposal system and producer statement have been supplied to the Chief Executive.
- c) The designer of the on-site wastewater disposal system shall supervise the installation and construction of the system and shall provide a construction producer statement to the Chief Executive.
- d) An operation and maintenance manual shall be provided to

the lot owner of the system by the designer and a copy supplied to the Chief Executive. This manual shall include a maintenance schedule and an as-built of the system dimensioned in relation to the legal property boundaries. A code of compliance certificate for the dwelling and/or disposal system shall not be issued until the construction producer statement and a copy of the lot owner's maintenance and operating manual have been supplied to the Chief Executive. The maintenance and operating manual shall be transferred to each subsequent owner of the disposal system.

- e) Wastewater disposal areas shall be located such that the maximum separation (in all instances greater than 50 metres) is achieved from any water course or any water supply bore.

Stormwater

11. Stormwater from buildings and impermeable surfaces on Lot 2 shall be discharged to ground contained entirely within Lot 2 in a sustainable manner such that it does not adversely affect adjoining properties. Confirmation of the stormwater discharge system shall be confirmed in writing to the Chief Executive at the time a new dwelling is constructed on Lot 2.

Telecommunications

13. b) No telecommunication connection is provided to Lot 2 and the provision of telecommunications connections is the responsibility of the owner or successor at the time of dwelling construction. Telecommunication connections may include cellular networks, satellite services or wifi.

High Voltage Transmission Lines

15. a) All trees/vegetation (in excess of 1 metre in height) and/or buildings/structures on Lot 2 shall be set back by a horizontal distance of at least 12 metres either side (total of 24 metres) of the centre line of the High Voltage Transmission Line shown in Map 42 of the Operative 2008 Central Otago District Plan Maps.
- b) Any buildings or structures, or any part of a building or structure on Lot 2 shall not be located within 11 metres vertically and 22.5 metres horizontally of the conductors of the High Voltage Transmission Line shown in Map 42 of the Operative 2008 Central Otago District Plan Maps.
- c) All machinery and mobile plant operated on Lot 2 shall, at all times maintain a minimum clearance distance of 4 metres from the conductors of the High Voltage Transmission Line shown in Map 42 of the Operative 2008 Central Otago District Plan Maps.

- d) Excavated or other material shall not be deposited under or near the High Voltage Transmission Line shown in Map 42 of the Operative 2008 Central Otago District Plan Maps which will reduce the vertical distance from the ground to the conductors to a distance less than:
 - i) 7.5 metres vertically, across or along driveways or on any other land traversable by vehicles;
 - ii) 6.0 metres vertically, on any land not traversable by vehicles due to inaccessibility; and
 - iii) 4.5 metres in any distance other than vertical on all land.

Note: The distances specified include an allowance for mechanic creep (i.e. permanent elongation).

DATED this 5th day of January 2018

SIGNED for and on behalf of the
CENTRAL OTAGO DISTRICT COUNCIL

BY ITS Manager Planning and Environment



.....
(Louise van der Voort)

Pursuant to delegated authority

The attached water test is appended to and forms part of this consent notice.



WATER TESTING LABORATORY

Lake Street Invercargill
 ph (03) 218 2188 fax (03) 218 2788

07-Dec-18

Lab Reference Number: B 21978

SouthDrill Water Test Report: Invercargill

Name: Symons
 John

Address:

Order No: 3631

Date Received: 5/12/2018 9:30

Date Sampled: 4/12/2018 15:00

Sample Description: New Bore Lot 2

Bacteriological Analysis

Test	Result	Units	Method
Total Coliform:	35	Colony Forming Units per 100ml	(APHA 21ed 9222 B)
Faecal Coliform:	less than 1	Colony Forming Units per 100ml	(APHA 21ed 9222 D)
Enterococci:	less than 1	Colony Forming Units per 100ml	(APHA 21ed 9230 C)
Escherichia coli:	less than 1	Colony Forming Units per 100ml	(APHA 21ed 9222 G)

Physical and Aggregate Properties

Test	Result	Units	Method
pH:	7.48		(APHA 21ed 4500-H+ B)
pH after Aeration:	8.05		(APHA 21ed 4500-H+ B)
Turbidity:	0.4	NTU	(APHA 21ed 2130 B)
Total Hardness:	145	mg per litre as CaCO3	(APHA 21ed 2340 C)
Calcium Hardness:	58	mg per litre as CaCO3	(APHA 21ed 2340 C)
Magnesium Hardness:	87	mg per litre as CaCO3	(APHA 21ed 2340 C)

Chemical Analysis

Test	Result	Units	Method
Iron:	0.06	mg per litre	(APHA 21ed 3500-Fe B)
Nitrate Nitrogen:	1.47	mg per litre as N	(NWASCO 38)
Ammoniacal Nitrogen:	0.02	mg per litre as N	(NWASCO 38)
Chloride:	8	mg per litre	(APHA 21ed 4500-Cl-B)
Manganese:	0.01	mg per litre	(APHA 21ed 3500-Mn B)

Bacteriologically this water sample showed no faecal contamination. A hard water sample.

A. Cocker
 Lab Manager

Civic Administration Building • 101 Esk Street • Private Bag 90104 • Invercargill 9840 • New Zealand • DX No. YA90023 • TEL 03 218 1777



Gate 1
Gridco Road
Otara, Auckland 2023
PO Box 17 215
Greenlane, Auckland 1546
New Zealand
P 64 9 590 6000
F 64 9 589 2310
www.transpower.co.nz

Form 2B - Response

Enquiry Reference: PATAI000903
Property Address: 155 Dunstan Road, Alexandra, Alexandra 9391

Thank you for your enquiry. Transpower's Roxburgh - Islington A (Nth) (ROX-ISL-A) 220 kV transmission line is located in close proximity to the site; however, the line does not traverse the site. I have attached a Transpower aerial plan showing this and the *National Grid Yard (shown as blue corridor)*, which is a corridor 12m either side of the centreline of Transpower's transmission lines. Please note that the 12m setback from the closest visible edge of the tower foundation is not shown on this map. This will need to be physically measured on site.

Specific Comments

Transpower understands that the proposal is for subdivision and development creating 40 residential lots. Plans showing two layouts have been provided with the enquiry: 1) 40 lot subdivision of 155 Dunstan Road and 129 Gilligans Gully Road (drawing titled 'CONCEPT SCHEME PLAN LOT 1 DP 518150 & LOT 3 DP 399742 155 DUNSTAN ROAD, ALEXANDRA', Job No. 3114_06B, dated 20 July 2023) 2) 40 lot subdivision of 155 Dunstan Road, 129 Gilligans Gully Road, 147 Dunstan Road and 149 Dunstan Road (drawing titled 'CONCEPT SCHEME PLAN LOT 1 DP 518150 & LOT 3 DP 399742 155 DUNSTAN ROAD, ALEXANDRA', Job No. 3114_06C, dated 20 July 2023). We understand that the applicant no longer wishes to pursue the subdivision at 147 and 149 Dunstan Road, therefore no further assessment of that proposal is provided. Transpower's assessment relates solely to the proposed subdivision contained within the site at 155 Dunstan Road (Job No. 3114_06B). The site at 155 Dunstan Road is not subject to any National Grid assets, although a small portion of the existing accessway is located within the National Grid Yard (NGY) of the ROX-ISL A National Grid transmission line. The NGY is 12m setback from either side of the centre line, and from the support structure. Transpower does not have any concerns with the proposed subdivision layout as the new lots will be well set back from the National Grid assets. However, we note that as part of the proposed subdivision, the entrance to 155 Dunstan Road is to be upgraded and vested to Council. Any earthworks undertaken as part of the accessway upgrade will need to comply with the requirements of NZECP. In accordance with Clause 2.2.3, no excavation greater than 0.3m depth within 6m from the exposed foundations of the tower is permitted. Excavation between 6-12m from the tower foundation shall not exceed 3m in depth (see attached 'Minimum Approach Distances' diagram). Additionally, no mobile plant or large vehicles used during construction of the proposed addition may come within 4 meters of any transmission lines when operating on site. For the small section of the existing accessway within the NGY, any proposed new trees or vegetation within 12 metres either side of the centreline of the National Grid transmission line, must not exceed 2 metres in height at full maturity and must comply with the Electricity (Hazards from Trees) Regulations 2003, or any subsequent revision of the regulations.

If you would like to clarify or discuss any matter raised above, or require any additional information, please contact us again through Pātai. You can also find information regarding Development near the National Grid on the [Transpower website](#), including the Transpower [Development Guide](#).

Thank you for contacting Transpower.

Please let us know how you found your experience with Transpower. Complete our survey [here](#).

Please note: Transpower reserves its right to revisit the abovementioned assessment should the proposal change or should a substantial amount of time pass following this assessment. This email cannot be relied upon if any site details and/or the nature of the development changes from that indicated in this correspondence. Please note that this email is not intended to be, and does not constitute, legal advice in relation to your legal obligations under New Zealand legislation, including under the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001).

Written Persons Approval for Resource Consent



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

+64 3 440 0056
info@codc.govt.nz
www.codc.govt.nz

(Form 8A) Section 95E(3), Resource Management Act 1991

Email to: resource.consents@codc.govt.nz

Post to: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

TO BE COMPLETED BY THE PERSON(S) REQUESTING APPROVAL

Applicant Name: Glenoir LP

Type of resource consent (circle all appropriate): Land-use / subdivision

Proposed activity:

30-lot residential subdivision

Location of site:

155 Dunstan Road, Alexandra

CONTACT DETAILS OF AFFECTED PARTY

Full Name/s: (name of person giving written approval) Joseph James Hughes

joe@summitcontractingltd.com

0276284927

Email

Phone

Address of the property (I am the owner of the following property): 149 Dunstan Road Alexandra

The full name of all other owners of the property: (owners of the affected property)

Jannah Mary Hughes

I have authority to sign on behalf of all the other owners of the property:

Yes

No other owners

NOTES

Conditional written approvals cannot be accepted.

There is no obligation to sign this form, and no reasons need to be given.

If this form is not signed, the application may be notified with an opportunity for submissions.

If signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

DECLARATION

- I have sighted all the attached plans and supporting information for the above activity.
- I have read the full application for resource consent, the Assessment of Environmental Effects, and any site plans as follows
- In signing this written approval, I understand that the consent authority must decide that I am no longer an affected person, and the consent authority must not have regard to any adverse effects on me.
- I understand that I may withdraw my written approval by giving written notice to the consent authority before the hearing, if there is one, or, if there is not, before the application is determined.

Signature

13-01-2025

Date

If you have any questions, please contact the Central Otago District Council by phoning 03 440 0056 or email resource.consent@codc.govt.nz

Central Otago District Plan. Large Lot Residential Zone downloaded 17 April 2025.

Large Lot Residential Zone		Operative: 21/02/2025
LLRZ-S5	Setback from Road Boundary	Activity Status where compliance not achieved:
Large Lot Residential Zone	1. Any building or structure shall be setback a minimum of 7m from a boundary with a road, except that this shall not apply to an uncovered deck less than 1m in height.	RDIS Matters of discretion are restricted to: <ol style="list-style-type: none"> Any adverse effects on the safety and efficiency of the road network. The extent to which the breach will have adverse effects on visual amenity values, including dominance. Compatibility of the building or structure with the surrounding built environment.
Large Lot Residential Zone - Within 80m of the seal edge of a State Highway	2. New residential buildings shall be designed and constructed to meet noise performance standards for noise from traffic on the State Highway that will not exceed 35dBA Leq (24hr) in bedrooms and 40dBA Leq (24hr) for other habitable rooms in accordance with the satisfactory sound levels recommended by Australian and New Zealand Standard AS/NZ2107:2000 Acoustics — Recommended design sound levels and reverberation times for building interiors. This shall take account of any increases in noise from projected traffic growth during a period of not less than 10 years from the commencement of construction of the development.	RDIS Matters of discretion are restricted to: <ol style="list-style-type: none"> The effect on the safe and efficient operation of the roading network. The effect on the amenity of persons nearby as a consequence of noise generated by activities on the State highway network.

Excerpt from Plan Change 19 – Decision of the Central Otago District Council Hearings Panel. Page Dated 27 June 2024. Appendix One – PC 19 Provisions as Amended by Decisions (Page 15) Downloaded 17 April 2025.

🔍 Ask Copilot – + ↔ 103 of 216 🔍 📄		
		the breach.
LLRZ-55	Setback from road boundary	Activity Status where compliance not achieved:
Large Lot Residential Zone	<ol style="list-style-type: none"> Any building or structure shall be setback a minimum of 74.5m from a boundary with a road, except that this shall not apply to an uncovered deck less than 1m in height. 	RDIS Matters of discretion are restricted to: <ol style="list-style-type: none"> Any adverse effects on the safety and efficiency of the road network. The extent to which the breach will have adverse effects on visual amenity values, including dominance. compatibility of the building or structure with the surrounding built environment. <u>Any constraints which make compliance impractical.</u>
Large Lot Residential Zone - Within 80m of the seal edge of a State Highway	<ol style="list-style-type: none"> New residential buildings shall be designed and constructed to meet noise performance standards for noise from traffic on the State Highway that will not exceed 35dBA Leq (24hr) in bedrooms and 40dBA Leq (24hr) for other habitable rooms in accordance with the satisfactory sound levels recommended by Australian and New Zealand Standard AS/NZ2107:2000 Acoustics – Recommended design sound levels 	RDIS Matters of discretion are restricted to: <ol style="list-style-type: none"> <u>The effect on the safe and efficient operation of the roading network.</u> <u>The effect on the amenity of persons nearby as a consequence of noise generated by activities on the State highway network.</u>

Jessie Dick

From: Customer Services <info@codc.govt.nz>
Sent: Thursday, 17 April 2025 2:15 pm
To: Resource Consents
Subject: Fwd: FW: Received: APP250435280
Attachments: APP250435280.pdf

Categories: Jessie

From: craig@waveformplanning.co.nz
Sent: Thursday, April 17, 2025 2:11 PM
To: info@codc.govt.nz
Subject: FW: Received: APP250435280

Hello

The above resource consent application has been submitted.

Please note that the electronic application system did not include whether the Applicant requests public notification.

For the purposes of processing the application and generation of the invoice deposit, the Applicant requests public notification of the application.

Regards
Craig

Craig Barr | **Planning Consultant**
m. 027 406 5593
e: craig@waveformplanning.co.nz
w: waveformplanning.co.nz



From: resource.consents@codc.govt.nz <resource.consents@codc.govt.nz>
Sent: Thursday, 17 April 2025 2:02 pm
To: Craig Barr <craig@waveformplanning.co.nz>
Subject: Received: APP250435280

Thank you for your application. It has been successfully submitted to Central Otago District Council.

Your reference number is APP250435280.



RC250095 Glenoir LP

Revisions to Application

22 September 2025

Tanya Copeland

By email: Tanya.Copeland@codc.govt.nz

Dear Tanya,

This letter outlines a summary of proposed amendments to the Application (RC250095) to inform the Council's reporting officer and advisors, to assist with the preparation of the Council's report to be prepared in advance of the hearing scheduled for 23 October 2025 (The section 42A report).

The following updated document is attached and are presented as amendments to the Application:

- a) **Appendix 1:** Revised Attachment 1: Scheme Plan

The Landscape Master Plan prepared by Studio 3 (Attachment 2) will be updated and filed with you in the next few days. The changes to this plan are to primarily reflect the lot layout.

Summary of the Application as lodged and notified.

In relation to residential density, the Application as lodged sought 30 lots for residential activity (Lots 1-30) and a road connection into the adjoining site located to the south east (Hughes Property 149 Dunstan Road).

The site and activity qualifies as a 'comprehensive residential development' (**CRD**) because it complies with the definition in the District Plan which requires a site to be at least 2ha.

The CRD rules¹ of the District Plan provide a restricted discretionary activity resource consent for residential subdivision and land use where the density across the site is not greater than 1500m², which is a more flexible regime than the minimum site density rules which require a minimum site area of 1500m² for each lot intended to be used for residential activity.

¹ Rule LLRZ-R12



Therefore, a CRD subdivision and development with a density across the site not exceeding 1500m² would yield 27 residential lots and require resource consent as a restricted discretionary activity.

The application as lodged sought a non-complying activity resource consent because the proposed 30 lots exceeded a density across the site of 1500m². The proposed 30 lots equated to a density across the site of one residential lot per 1,377m².

The application was lodged with the written approval of the owners of the adjoining site to the south east, at 149 Dunstan Road (Hughes). In recognition of the amendments to the scheme, the Applicant intends to provide an updated written approval, prior to the issue of the S42A report.

Summary of Amendments

The revised subdivision scheme comprises the following key changes, summarised as follows and then elaborated upon further:

- Inclusion of a balance parcel of land at 157 Dunstan Road;
- A reduction in the number of residential lots so that the activity now complies with Rule LLRZ-R12 and is a restricted discretionary activity;
- Amendment to the location of the connecting road to the site to the southeast; and
- A park that will be vested to the Council (Lot 29).

Inclusion of land at 157 Dunstan Road

Resource consent RC250055 was granted for a subdivision of 155 and 157 Dunstan Road. 157 Dunstan Road adjoins the Application Site to the south and is also owned by the applicant (a copy of this resource consent is in **Appendix 2** to this letter).

The RC 250055 subdivision results in the creation of a 1,643m² area (referred to in that consent as Lot 100) being incorporated into the 155 Dunstan Road Site as a first stage of that subdivision. This is shown in the image below, which is extracted from the resource consent decision for RC 250055.



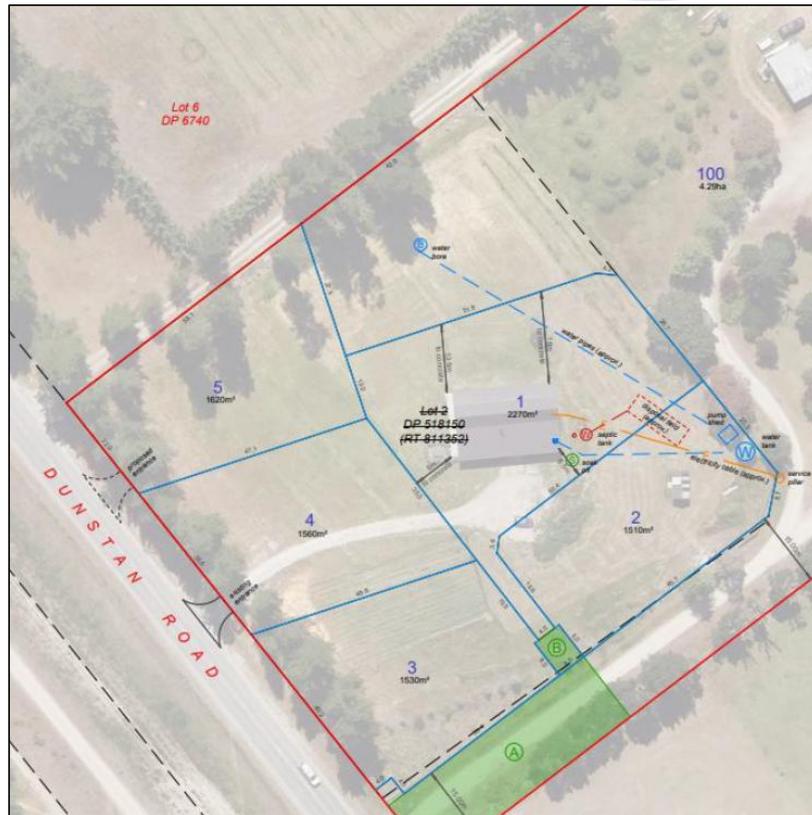


Figure 1. Extract of the approved plans of RC250055 which shows the portion of 157 Dunstan Road incorporated into the 155 Dunstan Road Site and identified as Lot 100.

Being part of Lot 100, the 1643m² area also forms part of the RC250095 Application site, as shown in Figure 3 of the AEE for RC250095 (which Figure is a replication of Figure 1). More particularly, the AEE for RC250095 acknowledges the creation of Lot 100 and identifies the entirety of Lot 100, inclusive of the 1643m² area, as being addressed by the application and forming the Application site, as referred to in sections 1.2, 3.2 of the AEE, the RT attached to the Application and the completed form 9.

Given the above, the 1643m² area (which forms part of the environment) needs to be reflected in the RC250095 application, including the scheme plan. Accordingly, the revised scheme plan which is attached to this letter and presented as an amendment to the RC250095 application includes this land, identifying it as proposed Lot 28.

Proposed Lot 28 has an area of 1,680m² (following a small adjustment to the lot shape following detailed site survey) and is proposed to be used for residential activity, with access via the ROW proposed in the original application.

Residential Density

The revised scheme plan includes the full extent of the Application site, which is 4.297ha in area, and reduces the total number of residential lots by 2, resulting in 28 residential lots across the entire Application site.

This equates to a density of 1,532m² per residential lot.

The revised residential density complies with CRD Rule LLRZ-R12.

Other Changes to the Scheme Plan

The connecting road (Lot 30) to 149 Dunstan Road has been moved southwards on the revised scheme plan.

A park is proposed (Lot 29) to the south of the road connection. The park is an area of 1,410m², is flat, and is considered in the context of the proposed subdivision to operate as a Neighbourhood Park as identified in the Council's Open Spaces and Recreation Strategy 2024-54².

A without prejudice meeting was held with the Council's parks manager Gordon Bailey on 19 September 2025. The scheme plan in Appendix 1 was presented to Mr Bailiry, who supported the concept of a neighbourhood park on this site, and also acknowledged the proposed location of the park with regard to the road connection (Lot 30) and likely future subdivision of land to the south.

The park (Lot 29) as proposed is considered by the Applicant to be an optimal size and location for the following reasons:

- It is located about 500m from the nearest existing park located to the south east (as identified in Figure 6 of the Parks Strategy). It will, therefore, provide a continued connection of parks located in existing suburban areas south of Dunstan Road, to connect with the emerging LLRZ located on the northern side of Dunstan Road.
- The park has good road frontage along which assist with informal parking and access. Noting that the Dunstan Cycle Trail is located on the opposite side of Dunstan Road.
- The park is on flat land.
- The park is located on the southern side of the main access road into the subdivision which as shown on the subdivision plan, with no residential lots on the southern side of the access road which means that there are no potential safety issues arising from the use of the footpath to access the park with vehicle crossings.
- Although the Parks Strategy suggests the minimum size for a Neighbourhood Park is 1500m², and an optimal size of between 3000m² to 5000m². The park as proposed is considered a sufficient size for the scale of the proposed subdivision.

The applicant intends to develop the park with a landscaping plan and park furniture and design submitted for certification as part of the post consent certification, and the park

² [URL Link to Parks Strategy](#)



developed prior to issue of titles. An appropriately worded condition can be included which implements this.

Revised Activity Status

The application as lodged required consents for the following under the LLRZ rules:

- LLRZ-R11 Earthworks (restricted discretionary activity);
- LLRZ-R12 Comprehensive Residential Development (non-complying activity);
- LLRZ-S4 Building Coverage (restricted discretionary activity);
- LLRZ-S5 Setback of buildings from a road boundary (restricted discretionary activity);
- LLRZ-S6 Setback of buildings from an internal boundary (restricted discretionary activity);
- SUB-R5 Subdivision of land where a land use consent has been obtained, or is applied for concurrently under Rule LLRZ-R12 (restricted discretionary activity); and
- District Wide Rule 12.7.8(v) for subdivision within 32m of the centreline of the National Grid (restricted discretionary activity).

With the revisions described above, the proposal now complies with Rule LLRZ-R12 because the density across the site does not exceed 1500m².

The overall activity status of the revised proposal under the LLRZ framework is **restricted discretionary**.

Scope for the inclusion of Lot 28

To clarify any doubt over the scope for changes to the revised scheme plan including Lot 28, attached as **Appendix 3** to this letter is a legal opinion from Barrister Rebecca Wolt. Ms Wolt's opinion is that there is scope for this land to be included in the revised scheme.

Yours Sincerely



Craig Barr

Planner, MNZPI

ENCL:

Appendix 1: Revised Scheme Plan (and attachment 1 to the application).

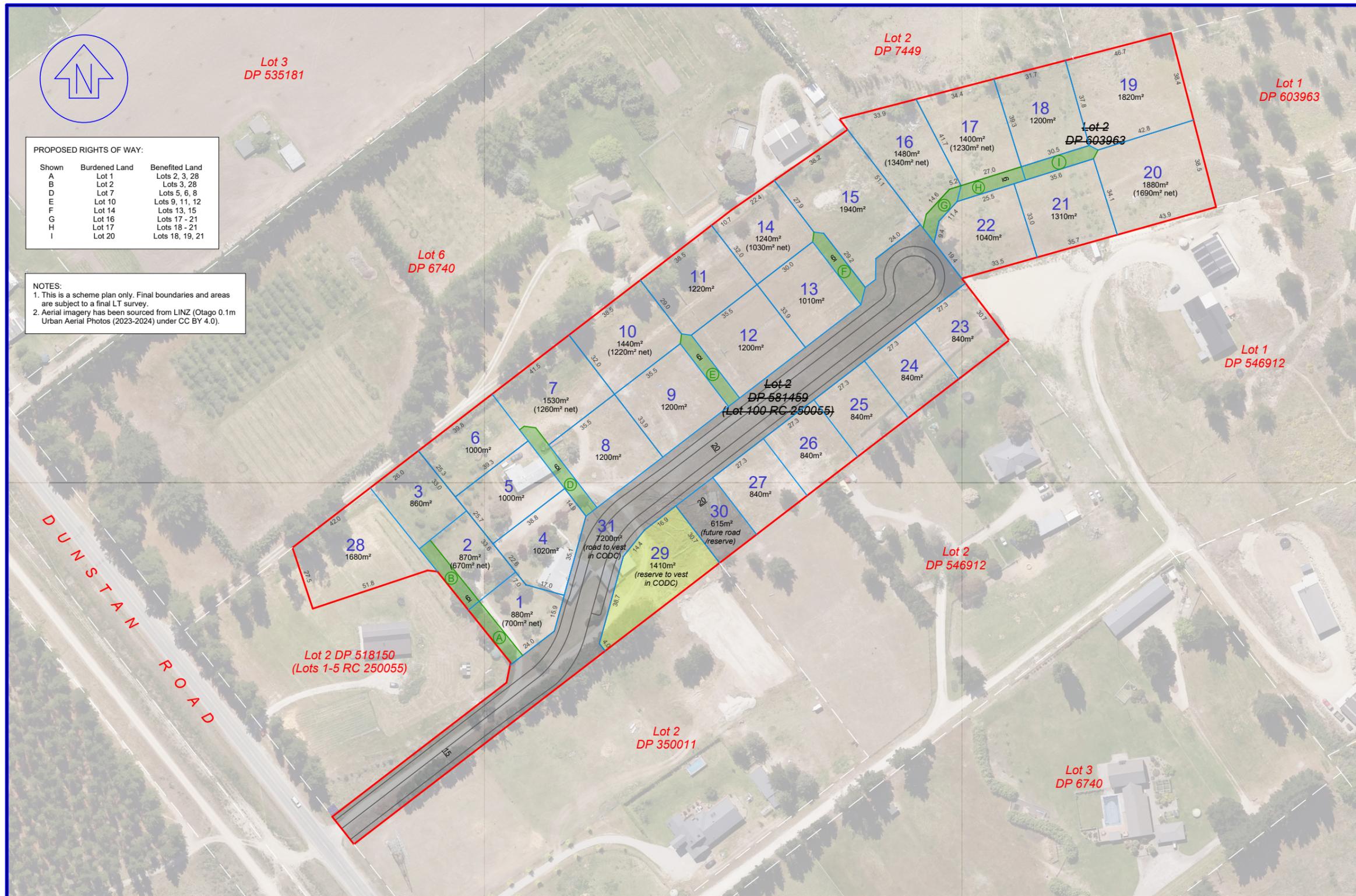




Appendix 2: RC250055 Decision

Appendix 3: Letter from Rebecca Wolt.





PROPOSED RIGHTS OF WAY:

Shown	Burdened Land	Benefited Land
A	Lot 1	Lots 2, 3, 28
B	Lot 2	Lots 3, 28
D	Lot 7	Lots 5, 6, 8
E	Lot 10	Lots 9, 11, 12
F	Lot 14	Lots 13, 15
G	Lot 16	Lots 17 - 21
H	Lot 17	Lots 18 - 21
I	Lot 20	Lots 18, 19, 21

NOTES:
 1. This is a scheme plan only. Final boundaries and areas are subject to a final LT survey.
 2. Aerial imagery has been sourced from LINZ (Otago 0.1m Urban Aerial Photos (2023-2024) under CC BY 4.0).



**LOTS 1 - 31 BEING A PROPOSED SUBDIVISION
 OF LOT 100 RC 250055
 155 DUNSTAN ROAD, ALEXANDRA**

Date:	17 Sep 2025
Scale:	1:1500 @ A3
Drawn by:	JS
Client:	Glenoir LP
Job No:	3114_06H

2853159702
RC250055

17 June 2025

Glenoir LP
c/- Waveform Environmental Planning
3 Frederick Street
Wanaka 9305

Via email

Dear Sir/Madam

Decision Notification: RC 250055 – Glenoir LP – 155 & 157 Dunstan Road, Alexandra

I enclose a copy of the Council's decision on the above application as required by section 114(1) of the Resource Management Act 1991.

I also draw your attention to Section 120 of the Act which provides for the right to appeal a decision, or part of a decision, under certain circumstances. Please note that there is no right of appeal against the whole or any part of a decision to the extent that the decision relates to a boundary activity unless the boundary activity is a non-complying activity.

Appeals must be lodged with the Environment Court and served on the consent authority within 15 working days of notice of the decision being received in accordance with Section 121 of the Resource Management Act 1991."

Yours faithfully



Karen Smith
Planning Support Officer



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz



CENTRAL OTAGO DISTRICT COUNCIL
DECISION OF THE HEARINGS PANEL

APPLICATION	RC 250055
APPLICANT	GLENOIR LP
ADDRESS	155 & 157 DUNSTAN ROAD, ALEXANDRA
LEGAL DESCRIPTION	LOT 2 DP 518150, LOT 2 DP 581459 AND LOT 2 DP 603963 (HELD IN RECORD OF TITLE 811352 AND 1182384).
ACTIVITY DESCRIPTION	SUBDIVISION CONSENT TO CREATE FIVE LOTS FROM A SUBDIVISION OF 155 DUNSTAN ROAD AND 157 DUNSTAN ROAD IN THE LARGE LOT RESIDENTIAL ZONE (PC19), AND LAND USE CONSENT UNDER THE NES-CS.
ACTIVITY STATUS	RESTRICTED DISCRETIONARY

INTRODUCTION AND PRELIMINARY MATTERS

This decision relates to an application for resource consent to subdivide the properties at 155 and 157 Dunstan Road, Alexandra, and to undertake a land use activity under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS).

The application was heard by a Panel of three Commissioners: Commissioner Ian Cooney, Commissioner Martin McPherson, and chaired by Commissioner Neil Gillespie. The hearing was held at the Alexandra Council Chambers. The applicant was represented by Mr Shaun O'Docherty and planning consultant Mr Craig Barr, both in person. Mr Shanon Garden attended remotely via Microsoft Teams. The Council's reporting planner, Mr Olivier Monthule-McIntosh, also attended remotely. Council officers Ms Ann Rodgers and Ms Karen Smith were present to provide technical and administrative support to the Panel.

The Panel has given due regard to the application documents, the section 42A report prepared by Mr McIntosh, and the applicant's responses to questions during the hearing.

The nature of the proposal and the Panel's assessment of the relevant statutory matters are set out below.

THE SITE

The subject site comprises two records of title:

- 155 Dunstan Road – Lot 2 DP 581459, and Lot 2 DP 603963, held in Record of Title 1182384, with a total area of 4.13 hectares.
- 157 Dunstan Road – Lot 2 DP 518150, held in Record of Title 772262, with a total area of 1.0138 ha.

The site is located on the northern side of Dunstan Road, in Alexandra. It is situated within a transitional area between the existing residential zones of Alexandra and the more rural character of the wider Dunstan Road corridor.

157 is the primary focus of this proposal, with 155 being of relevance insofar as its existing boundaries will be adjusted to accommodate some land currently within 155 and slight adjustments for access and servicing arrangements. 155 Dunstan Road contains an existing residential dwelling, located on the northern part (proposed Lot 1), along with associated landscaping, a private water supply (including bore, tank and pump), and on-site wastewater disposal system. The remainder of 155 Dunstan Road is largely undeveloped, comprising gently sloping pasture with some scattered vegetation and fencing.

An existing vehicle crossing provides access to the dwelling on 155 Dunstan Road. This access point is proposed to be upgraded to form the basis of the new right-of-way serving the subdivision.

A 220kV high voltage transmission line traverses the eastern portion of the site, within proximity to proposed Lot 3. A consent notice (CONO 11242025.6) affecting the site includes conditions relating to setbacks from this transmission infrastructure.

The site is not identified as being within any Outstanding Natural Landscape, nor does it contain any identified heritage, ecological or archaeological features. It is, however, included in the LLRZ area subject to Plan Change 19, which is under appeal and not yet fully operative.

The wider area consists of a mix of large residential and rural-residential sites, many of which are in transition as a result of PC19 zoning changes. The surrounding land uses are generally low density 'rural-residential- in character.

THE PROPOSAL

Subdivision

The application seeks subdivision consent to subdivide the site to create five residential allotments and one balance lot, in two stages.

The subdivision layout is as follows:

- Lot 1 (2,270m²) contains an existing residential dwelling and is proposed to be titled and sold as part of Stage 1.
- Lots 2–5 range in size from 1,510m² to 1,620m² and are vacant residential allotments to be created in Stage 2. Under stage 1 these lots will be held in a single amalgamated title consisting of Lot 2 and Lot 101.
- Lot 100 (4.29ha) is a balance lot containing the bulk of the land area from 155 Dunstan Road. This lot is proposed to contain a future right-of-way (ROW), services corridor, and internal access for future development (not part of this application).

Access to all proposed lots is via a new right-of-way extending from an existing vehicle crossing onto Dunstan Road. The ROW is proposed to be upgraded and formed to Council standards. Legal and physical access is to be secured by easement.

The applicant proposes to service the subdivision as follows:

- Lot 1 (Stage 1) will retain its existing on-site wastewater and water supply infrastructure. The wastewater field will be relocated fully within Lot 1, while the water supply line, tank and pump will temporarily remain located within Lot 2, with access secured via easement. The applicant has provided a Power of Attorney to facilitate future surrender of these easements at Stage 2.
- Lots 2–5 (Stage 2) are intended to be serviced via public water and wastewater infrastructure to be extended along Dunstan Road. While this extension is identified in Council's LTP, its delivery timeframe is uncertain and subject to future funding decisions. The applicant proposes to connect these lots to reticulated services prior to 224(c) for Stage 2.

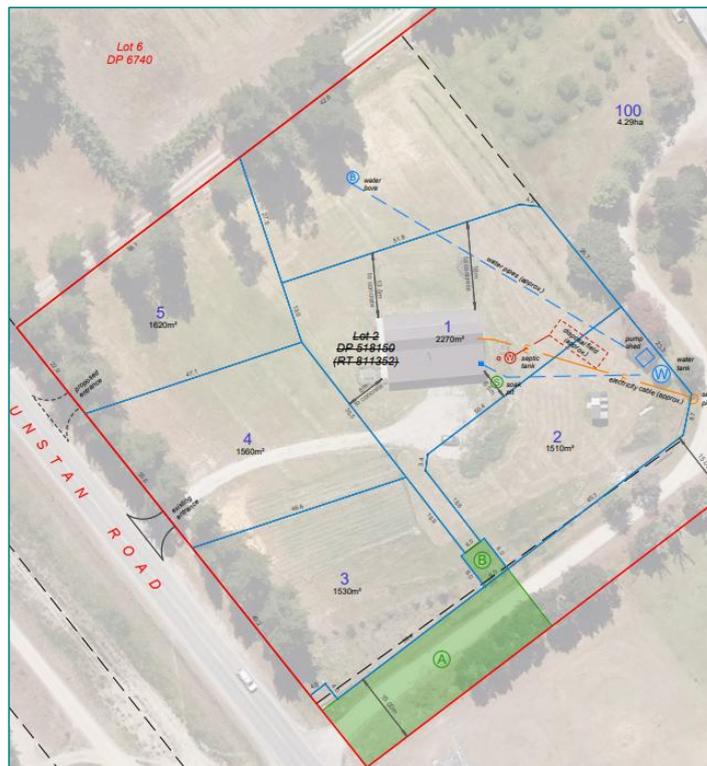


Figure 1: Proposed scheme plan extract.

Land Use

No separate land use consent is sought as part of this application. Any future land use on the residential lots will be subject to the zone provisions applying at the time of development. For completeness I note that, under the site's Operative Plan provisions, residential activity is a controlled activity and a permitted activity under the Proposed Plan provisions.

Cancellation of Consent Notice

The applicant proposes the cancellation of Consent Notice 11242025.6 as it relates to Lot 2 DP 518150. This consent notice was imposed under RC170326 and includes conditions relating to:

- Water treatment and on-site water storage;
- On-site wastewater disposal;
- Stormwater management;
- Telecommunications;
- Building setback restrictions in relation to the 220kV transmission line traversing the eastern part of the site.

The consent notice is proposed to be cancelled in its entirety, on the basis that the original servicing requirements are now redundant given the house on the site has been already built and more relevant conditions can be imposed through the proposed subdivision.

RULE FRAMEWORK**Operative Central Otago District Plan**

At the time of the hearing, the subject site remained zoned Rural (Residential) Resource Area under the Operative District Plan (ODP).

Subdivision consent is triggered by the following rules:

- *Non-complying activity* pursuant to Rule 4.7.5(iii), as the subdivision does not meet the average allotment size requirement of 2ha specified in Rule 4.7.2(ii)(a)(i).
- *Discretionary activity* pursuant to Rule 4.7.4(iii), as the proposal does not comply with Rule 4.7.2(ii)(a)(iv) which restricts the number of allotments for residential activity to five in total.
- *Restricted discretionary activity* pursuant to Rule 12.7.8(v), as portions of the site are located within 32 metres of the centreline and outer edge of a support structure of a 220kV transmission line.

No land use consent is required under the ODP for the proposed activities, as no buildings or use of land beyond subdivision are included in this application.

Proposed Plan Change 19 – Large Lot Residential Zone

The site is located within the Large Lot Residential Zone introduced via Plan Change 19 (PC19), which has legal effect under section 86B(1) of the RMA but remains under appeal and is not yet operative (per section 86F).

The Panel notes that:

- No appeals seek to revert the zoning of the site back to the Rural Resource Area.
- No appeal outcomes are likely to result in a minimum lot size requirement greater than 1,500m².

Accordingly, the LLRZ minimum lot size of 1,500m² is considered the most conservative applicable standard for the purpose of assessing this application.

Under PC19:

- The subdivision complies with the minimum lot size standard;
- It does not rely on the Comprehensive Residential Development provisions;
- It is therefore classified as a *restricted discretionary activity* under Rules SUB-R1 and SUB-S1.

In addition, earthworks associated with the subdivision may exceed 200m³ per site within a 12-month period, triggering Rule LLRZ-R11, which is also a *restricted discretionary activity*.

National Environmental Standards – Contaminated Soil (NES-CS)

The NES-CS applies due to the presence of current and historical HAIL activities on the site.

- A Preliminary Site Investigation (PSI) was undertaken for 157 Dunstan Road, identifying the decommissioned wastewater disposal area as a HAIL site. The PSI concludes that the subdivision is a permitted activity, subject to a 200-day stand-down period following decommissioning to mitigate human health risk. The applicant has volunteered a condition to restrict disturbance or development of this area during that period.
- A Detailed Site Investigation (DSI) was previously undertaken for 155 Dunstan Road under RC230380, confirming elevated arsenic levels in localised areas exceeding the residential soil contaminant standards. These areas are confined to land now proposed to become Lot 100, which will remain a balance lot and is not subject to development under this consent.

However, because the proposal involves subdivision of land containing a HAIL activity, Regulation 10(2) of the NES-CS applies. As such, the activity is classified as a *restricted discretionary activity*.

Consent Notice Cancellation

The application includes a request to cancel Consent Notice 11242025.6 (registered under instrument 11242025.6) as it applies to Lot 2 DP 518150, now legally described as part of the subject site.

This consent notice was originally imposed through subdivision consent RC170326 and contains conditions relating to:

- On-site water treatment and storage;
- On-site wastewater disposal;
- Stormwater management;
- Telecommunications provision;
- Building setbacks in relation to the 220kV high voltage transmission line traversing the site.

The applicant seeks cancellation of the consent notice on the basis that:

- The residential dwelling it relates to has been constructed in compliance with those requirements;
- The servicing arrangements will be replaced through the new subdivision consent and associated engineering design and conditions; and
- The transmission line setback condition will be reimposed via a new consent notice affecting relevant lots (e.g. Lots 3 and 4) created under this subdivision.

Accordingly, a *discretionary activity* resource consent is required pursuant to section 221(3) of the Resource Management Act 1991, which allows for the cancellation or modification of consent notices by way of resource consent.

Overall Activity Status

Where a proposal involves multiple activities with varying status, and the effects are inextricably linked, the application is considered in the round based on the most restrictive status pursuant to established case law (e.g. *Locke v Avon Motor Lodge Ltd*).

In this case:

- The subdivision is a *non-complying activity* under the Operative Plan,
- A *discretionary (restricted) activity* under PC19,
- A *discretionary (restricted) activity* under the NES-CS.
- And the variation of the consent notice is a *discretionary activity* under the RMA.

Accordingly, the application is assessed as a non-complying activity overall, pursuant to Sections 104, 104B, and 104D of the RMA.

NOTIFICATION AND WRITTEN APPROVALS

No written 'affected persons approvals' were provided in support of the application.

A separate decision under section 95 of the Act was made under delegated authority on 4 March 2025, determining that the application would be processed on a non-notified basis.

SECTION 104 MATTERS

Permitted Baseline

No permitted baseline has been applied to this proposal, there are no activities that offer a reasonable comparison to the proposal under the Central Otago District Plan and there is no permitted baseline to be applied.

Receiving Environment

For the purposes of this application, the receiving environment of the subject site comprises:

- The existing residential dwelling at 157 Dunstan Road, including its on-site water supply and wastewater disposal system;
- The existing vehicle access from Dunstan Road;
- The lawfully approved subdivision layout established under RC170326 and RC220249;
- The existing Consent Notice 11242025.6 conditions and setbacks, although these are proposed to be replaced;
- The anticipated development form under PC19, which has legal effect and applies the Large Lot Residential Zone (LLRZ) provisions. While PC19 remains under appeal, there are no appeals affecting the zoning of this site, and the minimum lot size of 1,500m² is unlikely to be increased;
- The existing easement arrangements and servicing infrastructure, including the water supply tank and bore servicing Lot 1, and its dependence on infrastructure located on Lot 2;
- The existing 220kV transmission line, and associated setbacks.

The receiving environment of adjacent land includes:

- A mix of larger rural-residential sites, many of which are in transition toward a denser residential character consistent with the zoning changes introduced by PC19;
- Existing dwellings and lifestyle blocks along the Dunstan Road corridor;
- The anticipated development of the applicant's landholdings to the west and south, including the more intensive subdivision proposed under RC230380;
- A partially formed road corridor and anticipated extension of Council reticulated water and wastewater infrastructure, identified in the 2021 Long-Term Plan.

The receiving environment is thus best characterised as a transitional peri-urban fringe, where rural-residential activity is giving way to large-lot residential subdivision under PC19.

ASSESSMENT MATTERS/RULES

The Hearings Panel adopts the assessment of effects set out in the section 42A report prepared by Mr McIntosh and summarises the key findings below. During the hearing, both the applicant and Mr McIntosh provided clarification on a number of matters at the Panel's request. However, no new evidence or information was presented that would materially alter the assessment of effects as set out in the officer's report. The Panel is therefore satisfied that the effects of the proposal have been appropriately identified, and that the conclusions reached in the report remain valid.

1. Effects on Rural Productive Values and Reverse Sensitivity

The site is located within an area that has been rezoned to the Large Lot Residential Zone (LLRZ) through Plan Change 19 (PC19). While PC19 remains under appeal, the rezoning of this site does not have full legal effect, however, the Panel notes there are no outstanding appeals that would fundamentally alter the zoning or minimum lot size provisions applicable to this land in a way that could result in them being more restrictive than they would be under the notified provisions. The proposed lots all exceed the 1,500m² minimum under PC19 (as notified) and are generally consistent with the intended development pattern for the LLRZ.

Although the subdivision departs from the historic rural-residential pattern of the Operative District Plan, this is no longer reflective of the planning framework for the area. The LLRZ zoning now in partial legal effect anticipates increased residential density, and accordingly, any associated land fragmentation, character change, and potential for reverse sensitivity is already accounted for. The Panel is satisfied that the proposal aligns with the outcomes anticipated under the relevant zoning and that no adverse effects arise in relation to rural productive values.

2. Subdivision Design, Density and Layout

The proposed layout complies with the LLRZ minimum lot size and reflects the intended low-density character. The subdivision avoids irregular configurations and allows for future servicing and access. The Panel finds the layout to be appropriate and that associated effects on amenity and landscape character will be less than minor.

3. Infrastructure Servicing and Staging Effects

The subdivision is staged to manage infrastructure constraints, with Stage 1 relying on existing on-site systems and Stage 2 contingent upon the availability of Council's reticulated services. Volunteered conditions ensure that no Stage 2 titles are issued without reticulated servicing. Council's engineering team and reporting planner have reviewed and confirmed the feasibility of the servicing and staging arrangements. The Panel considers the proposed approach to be sound, appropriately managed through conditions which have been offered up by the applicant on an *Augier* basis, and not likely to result in adverse effects on infrastructure capacity or implementation certainty.

4. Traffic and Access Effects

The subdivision will generate low volumes of traffic and proposes three separate access points from Dunstan Road: individual accessways to proposed Lots 4 and 5, and a shared right-of-way providing access to proposed Lots 1, 2 and 3. Legal access arrangements are secured through proposed easements. No road vesting is proposed as part of this application.

The Panel generally agrees with the assessment and recommendations in the s42A report regarding traffic and access effects. In particular, the Panel supports the recommendation to allow formation of the right-of-way to rural standard at Stage 1, noting the practical advantages of deferring sealing until Stage 2 when full servicing will be installed. This approach recognises the transitional nature of the staging while ensuring that access to the existing dwelling on Lot 1 remains functional and safe.

During deliberations, the Panel identified opportunities to provide greater clarity in the conditions of consent relating to access. As a result:

- Condition 8(m) has been amended to confirm that access to Lots 2 and 3 must be provided via Right-of-Way B, rather than any existing informal access arrangement.
- Condition 8(n) corrects a reference to 'Lot 101'—which will no longer exist following Stage 2—and instead refers to 'Lot 3'.
- Condition 8(o) clarifies that both Lots 4 and 5 are required to have accessways that comply with Council standards at Stage 2. This does not preclude the use of an existing accessway, provided its compliance with relevant roading policies can be demonstrated.

With these amendments, the Panel is satisfied that the proposed access arrangements are appropriate, safe, and consistent with the anticipated development pattern of the Large Lot Residential Zone.

5. Earthworks and Construction Effects

Earthworks are expected to be limited in scale and associated effects, such as dust, noise, and sedimentation, can be managed through standard engineering and erosion control conditions. No sensitive natural features are affected. The Panel agrees with the assessment that effects will be less than minor.

6. Natural Hazards

The site is not subject to any known natural hazards identified in planning maps. Firefighting water supply will be available via tank storage at Stage 1 and reticulated hydrants at Stage 2. The Panel is satisfied that appropriate conditions will mitigate any residual risk and that there is no significant hazard risk under section 106 of the RMA.

7. High Voltage Transmission Infrastructure and Consent Notice

The proposal involves the cancellation and replacement of Consent Notice 11242025.6, maintaining existing protections for the 220kV transmission line managed by Transpower. The Panel is satisfied that the proposed arrangements retain the intent and effect of the original notice and that the national grid will not be adversely affected.

8. Esplanade Reserves and Strips

There are no water bodies adjoining the site. No esplanade reserves or strips are required or proposed.

9. Financial Contributions

Financial contributions have been calculated in accordance with Council's Policy on Development and Financial Contributions and are to be levied as set out in the s42A report.

10. Amalgamations and Easements

The proposed amalgamations and easements are necessary to give effect to the proposed staging and access configuration. The Panel agrees with the proposed conditions ensuring that appropriate legal arrangements are in place for servicing and access during both stages of the development.

11. Section 106 and 220 Matters

The Panel finds no basis under section 106 to withhold consent. Conditions recommended under section 220 are appropriate and ensure that the subdivision will be implemented in accordance with Council's expectations for access, servicing, and amalgamation.

12. Positive Effects

The subdivision gives effect to PC19 zoning outcomes and contributes to anticipated residential growth within the Cromwell urban fringe. The Panel acknowledges these positive effects in its overall assessment.

OBJECTIVES AND POLICIES

Section 104(1)(b) of the Resource Management Act 1991 requires the Panel to have regard to any relevant objectives and policies of national environmental standards, policy statements, regional policy statements, and district plans.

The applicant's AEE includes an assessment of the relevant objectives and policies. The s42A report prepared by Mr McIntosh provides a more detailed thematic analysis, and the Panel adopts that assessment for the purposes of this decision. The key conclusions are summarised below.

While the proposal is technically non-complying under the Operative District Plan, due to non-compliance with the Rural Residential zone subdivision standards, the Panel agrees that the relevant objectives and policies of the operative plan carry limited weight. Plan Change 19 (PC19) has legal effect and applies a Large Lot Residential zoning to the site. The zoning is not subject to any appeals seeking a reversion to Rural Residential or a more restrictive regime, and therefore represents the most relevant and certain policy framework.

The proposed subdivision aligns well with the purpose and anticipated outcomes of the Large Lot Residential Zone under PC19. The lots exceed the minimum size requirements, support a low-density residential pattern, and are capable of accommodating future development in keeping with the expected character and amenity values of the zone.

The subdivision layout, servicing approach, and staging are consistent with the relevant subdivision and infrastructure policies in both the operative plan and PC19. Development contributions will ensure appropriate cost recovery for infrastructure and reserves. The Panel is satisfied that the proposal aligns with the growth strategy for Alexandra and gives effect to the relevant subdivision, land use, and infrastructure objectives.

The Panel accepts that the remaining operative Rural Resource Area objectives and policies are not determinative in this context and considers the proposal consistent with the relevant policy framework when assessed in light of PC19.

With respect to the Operative and Proposed Otago Regional Policy Statements, the Panel agrees with the reporting officer that the District Plan gives effect to these higher-order instruments in all relevant respects and that no further assessment is required.

OTHER MATTERS – SECTION 104(1)(c)

Section 104(1)(c) of the Resource Management Act 1991 requires the Panel to have regard to any other matters considered relevant and reasonably necessary to determine the application.

In this case, the matters of plan integrity and precedent are relevant, given the proposal's non-complying activity status under the Operative District Plan.

However, the Panel agrees with the reporting planner that the non-compliance is technical in nature and must be considered in light of the transitional planning context. Plan Change 19 (PC19), which has legal effect, rezones the subject site to Large Lot Residential and provides for subdivision down to 1,500m² as a restricted discretionary activity. The proposed subdivision fully complies with the PC19 standards and anticipated development pattern. The Panel is satisfied that the remaining appeals on PC19 do not affect the zoning or subdivision framework relevant to this site.

In this context, granting consent would not establish an adverse precedent or undermine the integrity of the District Plan. The decision reflects a specific planning transition already in effect and would not provide justification for other Rural Residential subdivisions that do not share the same zoning context or strategic support.

The Panel is therefore satisfied that approval of this application will not compromise the intent or integrity of the District Plan.

SECTION 104D

Under section 104D of the Resource Management Act 1991, a consent authority may grant resource consent for a non-complying activity only if it is satisfied that either:

- The adverse effects of the activity on the environment will be no more than minor; or
- The activity will not be contrary to the objectives and policies of both the operative and proposed District Plan.

In this case, the Panel finds that the proposal will have no more than minor adverse effects on the environment. This conclusion applies to effects on character and amenity, servicing and infrastructure, land contamination, and the transitional nature of the planning context.

While the proposal is not consistent with the objectives and policies of the Operative District Plan, particularly those relating to rural character, lot size, and land fragmentation, the Panel notes that these provisions are increasingly superseded by the direction set through Plan Change 19 (PC19). Nonetheless, the activity remains contrary to the operative framework and does not meet the second limb of the test.

Because the application satisfies the first limb, the Panel is satisfied that the proposal passes the section 104D gateway and can therefore be considered under section 104 of the Act.

PART 2 OF THE ACT

Having regard to the findings above, the Panel is satisfied that the proposal is consistent with the purpose and principles set out in Part 2 of the Resource Management Act 1991. Granting

consent will promote the sustainable management of natural and physical resources in a manner that is consistent with the overarching purpose of the Act.

DECISION

Having regard to the reasons detailed above, the Panel resolves, pursuant to sections 104 and 104B of the Resource Management Act 1991, to subdivision and land use consent subject to the conditions attached to this decision.

Certified to be a correct copy of the decision of the Central Otago District Council.



Neil Gillespie
Hearings Panel Chairperson

Date: 17 June 2025



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- Consent Type:** Subdivision
- Consent Number:** RC 250055
- Purpose:** Subdivision consent to create five lots from a subdivision of 155 Dunstan Road and 157 Dunstan Road in the Large Lot Residential Zone (PC19), and land use consent under the NES-CS.
- Location of Activity:** 155 & 157 Dunstan Road, Alexandra
- Legal Description:** LOT 2 DP 518150, LOT 2 DP 581459 and LOT 2 DP 603963 (Held in Record of Title 811352 and 1182384).
- Lapse Date:** 9 July 2030, unless the consent has been given effect to before this date.

SUBDIVISION CONDITIONS:

1. The proposed activity must be undertaken in general accordance with the approved plans attached to this certificate as Appendix One, and the information provided with the resource consent application received by the Council on 11 March 2025, and further information received on 4 April 2025, 10 April 2025, 24 April 2025 and 7 May 2025, except where modified by the following conditions.
2. Unless modified by other conditions, all designs and approvals are to be in accordance with NZS 4404:2004 and the July 2008 CODC Addendum. Together these two documents form the Council's Code of Practice for subdivision.
3. Prior to commencement of any physical work the consent holder must apply for and receive council Engineering Acceptance (EA) via the CODC online portal at:

CODC Home > Services > Planning > Land Development and Subdivision Engineering

This EA application must include:
 - a) Confirmation as to who their representative is for the design and execution of the engineering work.
 - b) Provision of design: reports, calculations, specifications, schedules, and drawings, as applicable.
4. Producer Statements/Certificates where appropriate are to be submitted as per NZS 4404:2004 in the form of:
 - a) Schedule 1A,

- b) Schedule 1B,
 - c) Schedule 1C, and
 - d) Standalone Schedule 1B for 3 waters work.
5. As-built drawings are to be lodged with the Council in accordance with clause 1.5.10(b) of NZS 4404:2004 and must comply with Council's "Specifications for as-built drawing documentation version 3.1". The as-built drawings are to be provided in *.dwg/*.dxf or *12da, and in *.pdf file format. New Zealand Vertical Datum (NZVD2016) must be used.
6. The subdivision may be staged, as set out below and as shown in the Staging Plan attached as [Appendix Two], providing that all necessary subdivision works (such as servicing, provision of formed legal access and other works required to satisfy conditions of this consent), are completed for each stage, as relevant, prior to certification being issued under Sections 223 and 224(c) of the Resource Management Act 1991.
- a) Stage One shall involve the titling of:
 - i) Lot 1;
 - ii) Lot 100; and
 - iii) Lot 101 and Lot 2, held within a single title.
 - b) Stage Two shall involve the creation of separate titles for each of Lots 2-5.
7. Prior to certification of the survey plan, pursuant to section 223 of the Resource Management Act 1991 for each stage of the subdivision, the consent holder must ensure the following:
- a) If a requirement for any easements for services, including private drainage, is incurred during the survey then those easements must be granted or reserved and included in a Memorandum of Easements on the cadastral dataset.
 - b) The Right of Way [A] and [B] must be duly granted or reserved and shown in a Memorandum of Easements on the cadastral dataset.
 - c) With respect to each stage:
 - i) At Stage One easements shall be provided for:
 - Domestic water supply from the existing bore (in proposed lot 100) and via tanks and filtration infrastructure (in proposed Lot 2) in favor of Lot 1; and
 - Firefighting water supply, including suitable access from the existing tank in proposed Lot 2 in favor of Lot 1; and
 - The existing power supply that comes from 155 Dunstan Road (Lot 2 DP 581459) in favor of Lot 1.
 - Legal access to Lot 2.

- ii) At Stage Two
- Where water supply (domestic and firefighting) is to be provided to all lots 1-5 from Council's reticulated network, those easements for temporary domestic and firefighting water supply to Lot 1, referenced in 6(c)(i) & (ii) above, shall be surrendered and removed from lots 100 and 2; and
 - The necessary easements shall be established for all new reticulated water supply, wastewater, power and telecoms infrastructure.
- d) The following amalgamation condition must be endorsed on the survey plan for Stage One:
- "That That Lots 2 and 101 are held together in one Record of Title" (CSN Request [1944853])"*
8. Prior to certification pursuant to section 224(c) of the Resource Management Act 1991, the consent holder must complete the following:

Infrastructure - General

- a) All works are to be designed and constructed to the satisfaction of Councils Infrastructure Manager or Group Manager - Three Waters.
- b) For Lots 2 – 5, at Stage 2, hydraulic modelling may be required by the Group Manager - Three Waters (at the consent holder's expense) at the time of detailed engineering design.

Potable water and firefighting supply

- c) Prior to the issue of section 224(c) certification for Stage 1, the existing domestic water storage tank serving Lot 1 shall be upgraded and/or confirmed to meet the following minimum requirements for firefighting water supply. These requirements shall thereafter be maintained in perpetuity:
- i. Minimum 30,000 litre capacity tank storage. Of this total capacity, a minimum of 20,000 litres shall be maintained at all times as a static firefighting reserve.
 - ii. A firefighting connection is to be located within 90 metres of the existing dwelling on Lot 1. In order to ensure that connections are compatible with Fire and Emergency New Zealand (FENZ) equipment the fittings are to comply with the following standards:
 - a. For *flooded sources*, a 70 mm Instantaneous Couplings (Female) NZS 4505
or,
for *suction sources*, 100 mm or 140 mm Suction Female Coupling (NZS 4505) with matching hose tail diameter.
 - b. All connections must be capable of providing a minimum flow rate of 25 litres per second at the connection point.
 - iii. The connection shall have a hardstand area adjacent to it to allow a Fire and Emergency New Zealand appliance to park on it. The hardstand area shall

- be located at the centre of a clear working space with a minimum width of 4.5 metres. Access shall be maintained at all times to the hardstand area.
- iv. Underground tanks or tanks that are partially buried (provided the tank is no more than 1 metre above ground) may be accessed by an opening in the top of the tank, removing the need for couplings.

Note: For more information on how to comply with this Condition or on how to provide for FENZ operational requirements refer to the Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008. In particular, the following should be noted:

For more information on suction sources see Appendix B, SNZ PAS 4509:2008, Section B2.

For more information on flooded sources see Appendix B, SNZ PAS 4509:2008, Section B3.

Advice Note: For Stage One, domestic water shall be provided to Lot 1 using existing infrastructure (bore on lot 100, power supply, tanks and filtration equipment on lot 2). For avoidance of doubt, no further works are required to secure that existing supply. That infrastructure was installed and certified as part of RC[200013] in 2020 and is confirmed as satisfactory for Lot 1/Stage 1.

- d) Stage Two:
- i) Construct a suitable watermain extension from the Dunstan Road trunk main in accordance with NZS 4404:2004 and Council's July 2008 Addendum. The design and connection point will be as agreed with the Group Manager – Three Waters at the time of Engineering Approval.
 - ii) Install water supply reticulation including watermains and ridermains such that all residential allotments are serviced, and firefighting capability is achieved in accordance with NZS 4404:2004 and the Council's July 2008 Addendum.
 - iii) Lots 1, 2, 3, 4, and 5, install a standard DN 20mm diameter water supply connection with Acuflo toby valve, meters and approved boxes at the road boundary of any lot with a street frontage, or at the road boundary of any right of way, or as agreed with the Group Manager – Three Waters at the time of Engineering Approval.
- e) A service pipe must be extended to the buildable area of any allotment which does not front a road (including Lot 1).
- f) All potable water from the Council network used on site during construction must pass through a metered connection with appropriate backflow protection. No water may be drawn from any hydrant on the Council network.

Wastewater

- g) At Stage One, Lot 1 shall continue to be served by the existing in-field wastewater treatment and dispersion system that serves the property. The soakage field component of this system must be relocated to be within the boundary of Lot 1 (presently it extends across the proposed boundary of Lots 1 and 2). This current

and modified location is shown on the Soakage Field Relocation Plan at Appendix Four. These relocation works shall be undertaken, inspected and approved pursuant to an appropriate Building Consent for such works

Note: Council acknowledges such an application has been made under reference BC250193.

- h) At Stage Two, wastewater reticulation must be extended from the Alexandra Wastewater network at a location to be agreed with the Group Manager - Three Waters. The reticulation design for gravity or pressure sewer (location and sizing of pipework, connection points, maintenance structures etc.) shall be subject to engineering design and agreed with the Group Manager – Three Waters.
 - i. New standard 100mm ID residential wastewater connections must be installed from the new reticulation to serve each of proposed Lots 1 to 5, with cleaning eyes installed on the street side of the street-property boundary for each connection, and/or as agreed with the Group Manager – Three Waters at the time of Engineering Acceptance.

Note: Lot 1's reliance on on-site wastewater disposal is authorised for Stage 1 only. This on-site system will be required to be disestablished and Lot 1 connected to the new sewerage reticulation under Stage 2.

- i) The wastewater supply reticulation must be installed in accordance with 4404:2004 and Council's July 2008 Addendum.

Electricity and telecommunications

- j) Prior to Section 224(c) certification for Stage One, operational underground power and telecommunication connections must be installed at the street boundary of Lot 101.
 - i) Supply evidence of the consent from the network utility providers to the Chief Executive.
 - ii) Meet all the costs associated with the installation of electricity services necessary to serve the needs of the subdivision.

Advice Note: In the case of Stage One, the house on Lot 1 is currently serviced by a power connection. No further power or telecom reticulation shall be required as part of stage one.

- k) Prior to Section 224(c) certification for Stage Two, operational underground power and telecommunication connections must be installed at the street boundary and, in the case of back lots, extended to the buildable area of all residential lots and
 - i) Supply evidence of the consent from the network utility providers to the Chief Executive.
 - ii) Meet all the costs associated with the installation of electricity services necessary to serve the needs of the subdivision.

Roading and Access

- l) Access to each lot shall be provided generally as set out in Appendix One.
- m) At Stage 1. Right of Way [A] and [B] must be designed and constructed in accordance with the Right of Way' requirements of Table 3.2 of Council's July 2008 Addendum to NZS 4404:2004, as modified by the following:
- Minimum formed carriageway width of 4.5 metres
 - Minimum ROW legal width of 6.0 metres.
 - Camber of 5-8%.
 - Subgrade >CBR of 7.
 - Durable well-bound wearing course to be constructed over pit-run base to provide all-weather traction and prevent surface ravelling.
 - Shallow trafficable side-drains / water channels over level sections.
 - Stormwater discharging to soak pits within the ROW or to natural water courses.
 - Accessway/vehicle crossings from the ROW B to proposed Lots 1 and 101 must be demonstrated to be in accordance with or constructed in compliance with Part 29 of Council's Roading Policies January 2015.
- n) At Stage 2, Right of Way [A] and [B] must be designed and constructed in accordance with the Right of Way (2-4 Lots) requirements of Table 3.1 of Council's July 2008 Addendum to NZS 4404:2004, as modified by the following:
- Minimum sealed carriageway width of 4.0 metres
 - Minimum ROW legal width of 6.0 metres.
 - Camber of 4%.
 - Subgrade >CBR of 7.
 - Metal depths to NZS4404:2004 and Addendum standards.
 - Stormwater must be disposed of by soakpits within the right-of-way.
 - ROW B to have standard kerb and channel, as appropriate given its layout.
 - ROW A to have standard kerb and channel on the north side of the of the carriageway over 75mm compacted depth AP40 metal, and shallow side-swales on the south side of the carriageway and concrete edge-break protection to the satisfaction of Council's Infrastructure Manager.
 - A two-coat chip seal, standard concrete, concrete paving block or 30mm depth asphaltic carriageway surfacing.
 - Cut/fill batters outside ROW boundaries with maximum 4:1 gradient to match existing ground or other as agreed by the Council Infrastructure Manager.
 - Attractive low maintenance surfacing (crushed schist or similar) or mown grass along verges between carriageway and ROW boundary, with 4% crossfall.
 - Sealed accessway/vehicle crossings from the ROW to proposed Lots 1, 2, 3, and 100 must be constructed in accordance with Part 29 of Council's Roading Policies January 2015.
 - The existing accessway/vehicle crossing from Dunstan Road to the ROW serving Stage 1 of the subdivision must be demonstrated to comply with the requirements of Part 29 of Council's Roading Policies January 2015, including seal from the existing road seal to the Lot boundary, or be upgraded accordingly. The crossing must include a cutout 300mm into the sealed road or until the full thickness of the sealed road is reached, whichever is greater. The interface must have tape seal banding over all joins for new asphalt crossings, and at least 150mm chip seal overlap for

new chip seal crossings. Chip seal crossings must be two coat.

- o) At Stage 2, vehicle entranceway/crossings from Dunstan Road to serve proposed Lots 4 and 5 must be demonstrated to be in accordance with or constructed with the requirements of Part 29 of Council's Roading Policies January 2015, including seal from the existing road seal to the Lot boundary. The crossing must include a cutout 300mm into the sealed road or until the full thickness of the sealed road is reached, whichever is greater. The interface must have tape seal banding over all joins for new asphalt crossings, and at least 150mm chip seal overlap for new chip seal crossings. Chip seal crossings must be two coat.

Footpaths, Berms and Landscaping

- p) At Stage 2, a minimum 3.0m wide concrete or asphaltic concrete shared footpath-cycleway must be constructed on the North side of the proposed 'Right of Way A' and extended out to Dunstan Road to facilitate pedestrians and cyclists to cross to the Rail Trail.
- q) All necessary traffic signs and road markings must be provided to the satisfaction of Council's Infrastructure Manager.
- r) Cut/fill batters outside of road boundaries must be formed with maximum 4:1 gradient to match the existing ground or other as agreed by Council's Infrastructure Manager.
- s) At Stage 2, landscaping of the Dunstan Road Boundary , including but not limited to;
- Timber rail fencing
 - Planting of trees and shrubs, and
 - Installation of irrigation, mulch and any necessary vermin protection to ensure the successful establishment of plants

Must be completed in general accordance with the landscape concept plan attached as Appendix 3.

Financial Contributions

- t) Payment of a reserves contribution of \$10,100.88 +GST (exclusive of Goods and Services Tax) calculated in terms of Rule 15.6.1(1)(a)(i) of the Operative District Plan.

Consent Notices

9. It is resolved that pursuant to Section 221(3) of the Resource Management Act 1991 that CONO 11242025.6 as it applies to Lot 2 DP 518150 shall be cancelled.

Note: This decision is does not automatically change the consent notice on the Record of Title. The consent notice held by Land Information New Zealand on the Record of Title remains the legally binding document. A certificate to cancel the existing consent notice will be provided, along with the approval of any new (draft) consent notices, prior

to 224(c). It is the responsibility of the consent holder to deposit notice of the change with LINZ

10. Pursuant to Section 221 of the Resource Management Act 1991, consent notices must be prepared for registration on each of the certificates of title, for the following ongoing conditions:

Stormwater

- a) Stormwater from buildings and impervious surfaces must be either stored for beneficial re-use within the site, or be discharged to ground within the site using appropriately designed and constructed soakpits.

Landscaping

- b) The Landscaping Strip along the Dunstan Road frontage must be maintained in general accordance with the 'Section D - Dunstan Road Boundary' Landscape Concept Plan attached as Appendix Four to RC250055. It shall remain the responsibility of the landowner of each title containing areas of the amenity zone plantings to maintain them in good healthy condition and replace any dead or diseased plants within the next growing season

National Grid

- c) All trees/vegetation (in excess of 1 metre in height) and/or buildings/structures on Lot 2, 3 and 100 shall be set back by a horizontal distance of at least 12 metres either side (total of 24 metres) of the centre line of the High Voltage Transmission Line.
- d) Any buildings or structures, or any part of a building or structure on Lot 2, 3 and 100 shall not be located within 11 metres vertically and 22.5 metres horizontally of the conductors of the High Voltage Transmission Line.
- e) All machinery and mobile plant operated on Lot 2, 3 and 100 shall, at all times, maintain a minimum clearance distance of 4 metres from the conductors of the High Voltage Transmission Line.
- f) Excavated or other material shall not be deposited under or near the High Voltage Transmission which will reduce the vertical distance from the ground to the conductors to a distance less than:
- i. 7.5 metres vertically, across or along driveways or on any other land traversable by vehicles;
 - ii. 6.0 metres vertically, on any land not traversable by vehicles due to inaccessibility; and
 - iii. 4.5 metres in any distance other than vertical on all land.

Note: The distances specified include an allowance for mechanic creep (i.e. permanent elongation).

Wastewater Field Lot Two

- g) Following the relocation and commissioning of the wastewater soakage field serving Lot 1 within the boundary of Lot 1, no earthworks or land disturbance shall be undertaken in the area of the decommissioned soakage field in proposed Lot 2 (such earthworks including the removal of that decommissioned soakage field) for 200 days following decommissioning, except as allowed under Section 8(3) Permitted Activities – Ground Disturbance, of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011

LAND USE CONDITIONS:

1. The earthworks and construction work is to be under the control of a nominated and suitably qualified person. The contact details of this person must be both submitted to Council prior to the commencement of earthworks on the site and written on a sign/board on the boundary of the site so as to be visible to the public
2. Following the relocation and commissioning of the wastewater soakage field serving Lot 1 within the boundary of Lot 1, no earthworks or land disturbance shall be undertaken in the area of the decommissioned soakage field in proposed Lot 2 (such earthworks including the removal of that decommissioned soakage field) for 200 days following decommissioning, except as allowed under Section 8(3) Permitted Activities – Ground Disturbance, of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011
3. Any change in ground levels is not to cause a ponding or drainage nuisance to neighbouring properties.
4. Any fill material to be introduced to the site must comprise clean fill only.
5. The earthworks must be undertaken with the principles of industry best practice applied at all stages of site development including site stability, stormwater management, traffic management, along with dust and noise controls at the sites.
6. To ensure effective management of erosion and sedimentation on the site during earthworks and as the site is developed, measures are to be taken and devices are to be installed, where necessary, to:
 - a) divert clean runoff away from disturbed ground;
 - b) control and contain stormwater run-off;
 - c) avoid sediment laden run-off from the site;
 - d) mitigate dust emissions; and
 - e) protect existing drainage infrastructure sumps and drains from sediment run-off.
7. All loading and unloading of trucks with excavation or fill material is to be carried out within the subject site.

8. The consent holder must:
 - a) be responsible for all contracted operations relating to the exercise of this consent; and
 - b) ensure that all personnel (contractors) working on the site are made aware of the conditions of this consent, have access to the contents of consent documents and to all associated erosion and sediment control plans and methodology; and
 - c) ensure compliance with land use consent conditions.

9. If during any site disturbance, the consent holder or subsequent owners:
 - a) discovers koiwi tangata (human skeletal remains), waahi taoka (resources of importance), waahi tapu (places or features of special significance) or other Maori artefact material, the consent holder or subsequent owner must without delay:
 - i) notify the Consent Authority, Tangata whenua and Heritage New Zealand and in the case of skeletal remains, the New Zealand Police.
 - ii) stop work within the immediate vicinity of the discovery to allow a site inspection by Heritage New Zealand and the appropriate runanga and their advisors, who must determine whether the discovery is likely to be extensive, if a thorough site investigation is required, and whether an Archaeological Authority is required.
 - iii) Site work may recommence following consultation with the Consent Authority, Heritage New Zealand, Tangata whenua, and in the case of skeletal remains, the New Zealand Police, provided that any relevant statutory permissions have been obtained.
 - b) discovers any feature or archaeological material that predates 1900, or heritage material, or disturbs a previously unidentified archaeological or heritage site, the consent holder must without delay:
 - i) stop work within the immediate vicinity of the discovery or disturbance; and
 - ii) advise the Consent Authority, Heritage New Zealand, and in the case of Maori features or materials, the Tangata whenua, and if required, must make an application for an Archaeological Authority pursuant to Heritage New Zealand Pouhere Taonga Act 2014; and
 - iii) arrange for a suitably qualified archaeologist to undertake a survey of the site.
Site work may recommence following consultation with the Consent Authority.

10. At the end of the works, any exposed areas must be top-soiled and seeded as soon as possible to limit sediment mobilisation.

11. Any areas of certified or uncertified fill must be identified on a plan, and the plan and certificates submitted to Council to be recorded against the property file.

12. The consent holder shall pay to the Council all required administration charges fixed by

the Council pursuant to section 36 of the Act in relation to:

- a) Administration, monitoring and inspection relating to this consent; and
- b) Charges authorised by regulations.

ADVICE NOTES:

Future Implementation of Stage 2 and Legal Arrangements Affecting Lot 1

1. Council notes that at the time Stage 2 is intended to be given effect, Lot 1 will have been sold to a third party, and the applicant may no longer retain legal ownership or direct control of that lot.

The applicant has confirmed that they are fully aware of the risks associated with giving effect to Stage 2 under these circumstances, including their ongoing obligations to decommission existing infrastructure and connect Lot 1 to reticulated services. In this regard, the applicant has voluntarily assumed these risks and has provided evidence to Council that they have taken significant steps to legally future-proof their ability to undertake the required works. These steps include:

- The inclusion of specific terms in the Sale and Purchase Agreement for Lot 1, reserving rights to access the lot and complete the works required to satisfy Stage 2 conditions;
- The granting of a Limited Power of Attorney from the purchaser in favour of the applicant, enabling them to undertake and certify works on the purchaser's behalf.

Furthermore, Council records that the applicant has volunteered the staging and infrastructure-related conditions on an Augier basis, recognising that the implementation of Stage 2 is conditional upon the lawful and practicable delivery of infrastructure to all relevant lots, including Lot 1.

Earthworks

2. The Otago Regional Council also has rules regarding residential earthworks and the consent holder is advised to ensure that they do not require approvals from the Regional Council.

Financial Contributions

3. All charges incurred by the Council relating to the administration, inspection and supervision of conditions of subdivision consent must be paid prior to Section 224(c) certification.
4. Development contributions for water supply, wastewater and roading of \$37,869.55, \$40,004.35 and \$7,200.00 (exclusive of goods and services tax) are payable for pursuant to the Council's Policy on Development and Financial Contributions contained in the Long Term Council Community Plan. Payment is due upon application under the Resource Management Act 1991 for certification pursuant to Section 224(c). The

Council may withhold a certificate under Section 224(c) of the Resource Management Act 1991 if the required Development and Financial Contributions have not been paid, pursuant to section 208 of the Local Government Act 2002 and Section 15.5.1 of the Operative District Plan.

Access

5. It is the consent holder's responsibility to obtain all necessary Temporary Traffic Management Plans, Corridor Access Requests or any other approvals to undertake works within the road reserve. These approvals should be obtained prior to the works commencing.

Servicing

6. *Submission of an Application to Connect is required prior to connecting to Council's potable water or wastewater networks in addition to plans for water and wastewater servicing being submitted for Engineering Approval.*
7. *If water toby boxes must be within vehicle accessway/crossings, because other solutions are not feasible, they shall be all-metal so as to support sustained traffic.*

General

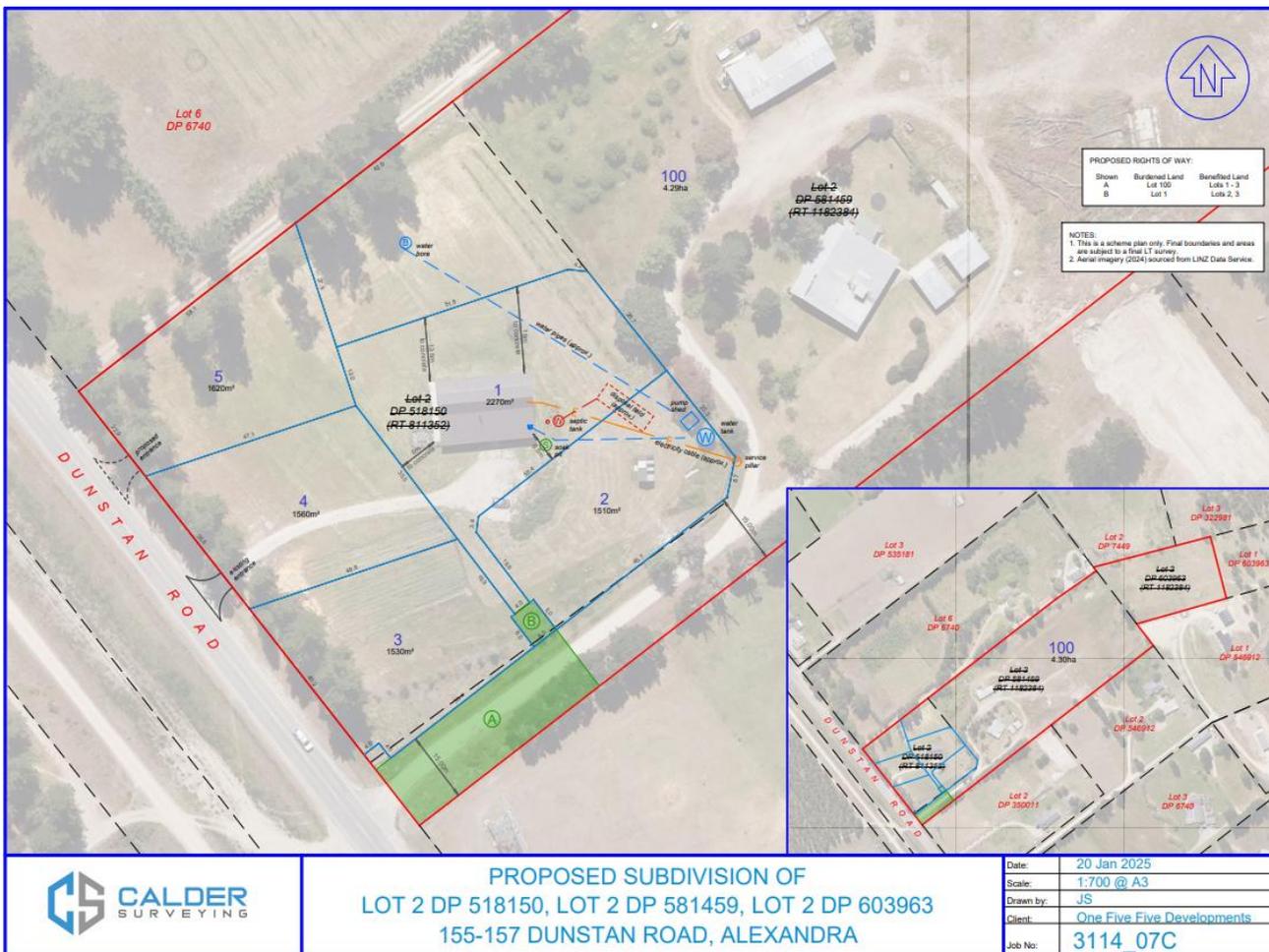
8. In addition to the conditions of a resource consent, the Resource Management Act 1991 establishes through sections 16 and 17 a duty for all persons to avoid unreasonable noise, and to avoid, remedy or mitigate any adverse effect created from an activity they undertake.
9. Resource consents are not personal property. The ability to exercise this consent is not restricted to the party who applied and/or paid for the consent application.
10. It is the responsibility of any party exercising this consent to comply with any conditions imposed on the resource consent prior to and during (as applicable) exercising the resource consent. Failure to comply with the conditions may result in prosecution, the penalties for which are outlined in section 339 of the Resource Management Act 1991.
11. The lapse period specified above may be extended on application to the Council pursuant to section 125 of the Resource Management Act 1991.
12. This is a resource consent. Please contact the Council's Building Services Department, about the building consent requirements for the work.

Issued at Central Otago on 17 June 2025.

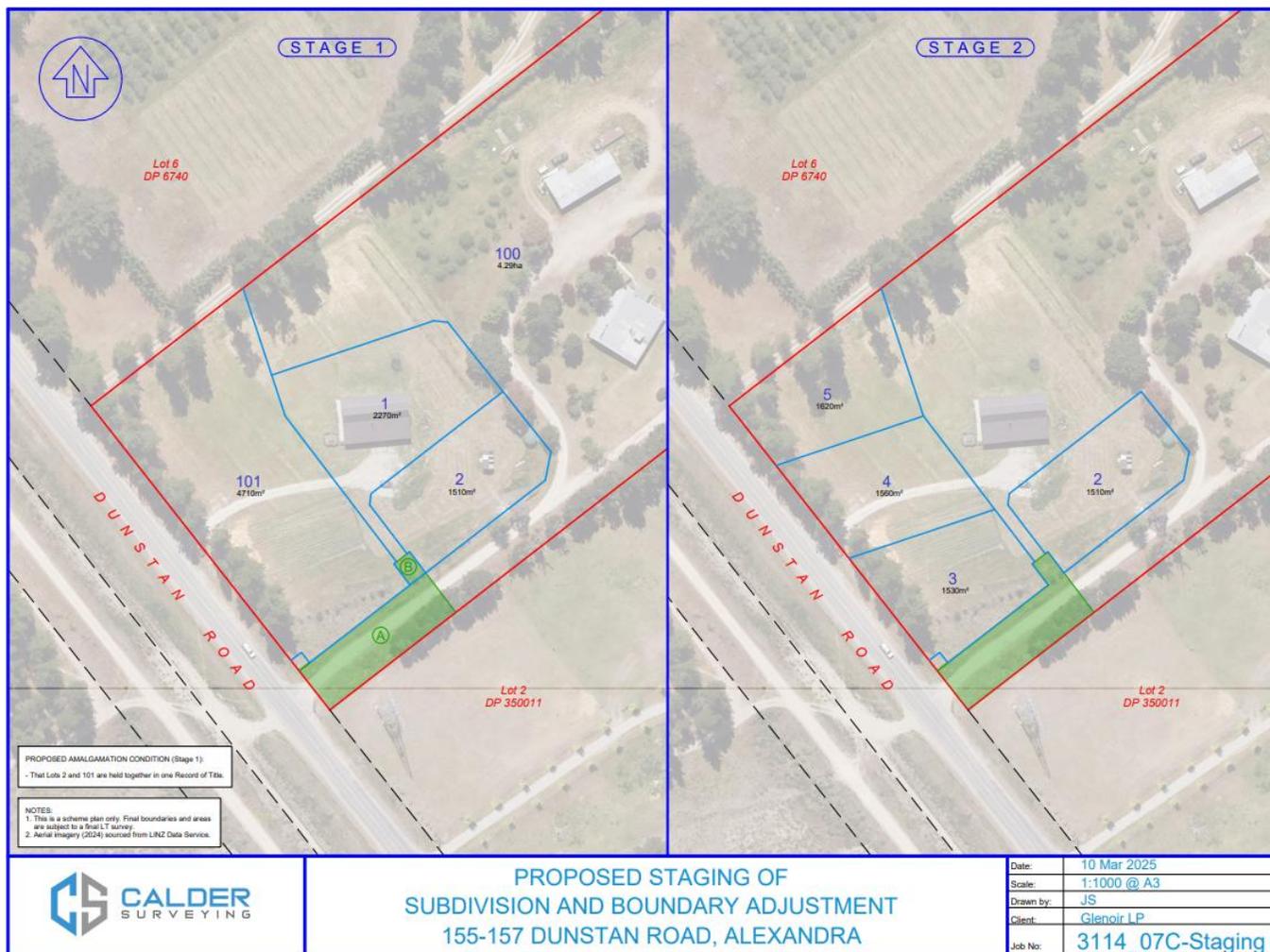


Karen Smith
Planning Support Officer

Appendix One: Approved Scheme Plan for RC 250055 (scanned image(s), not to scale)

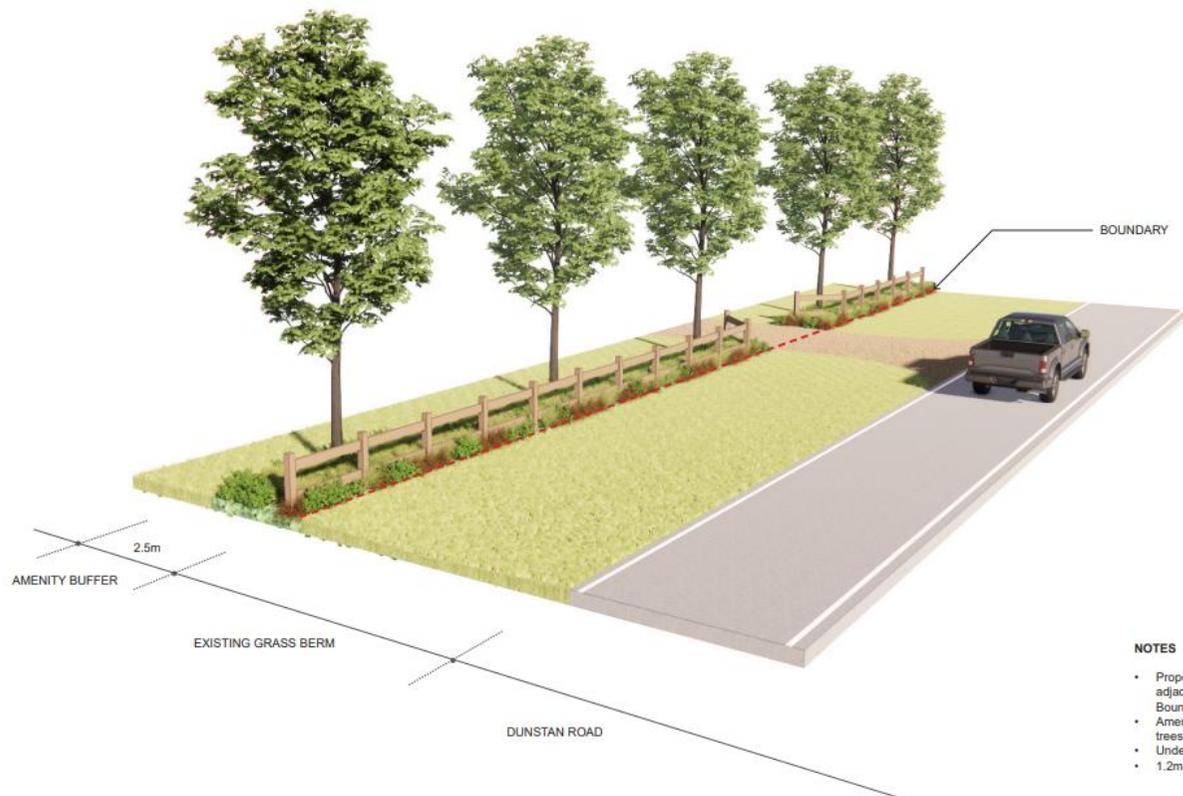


Appendix Two: Approved Staging Plan for RC 250055 (scanned image(s), not to scale)



Appendix Three: Approved Landscape Concept Plan for RC 250055 (scanned image(s), not to scale)

SECTION D
Dunstan Road Boundary



NOTES

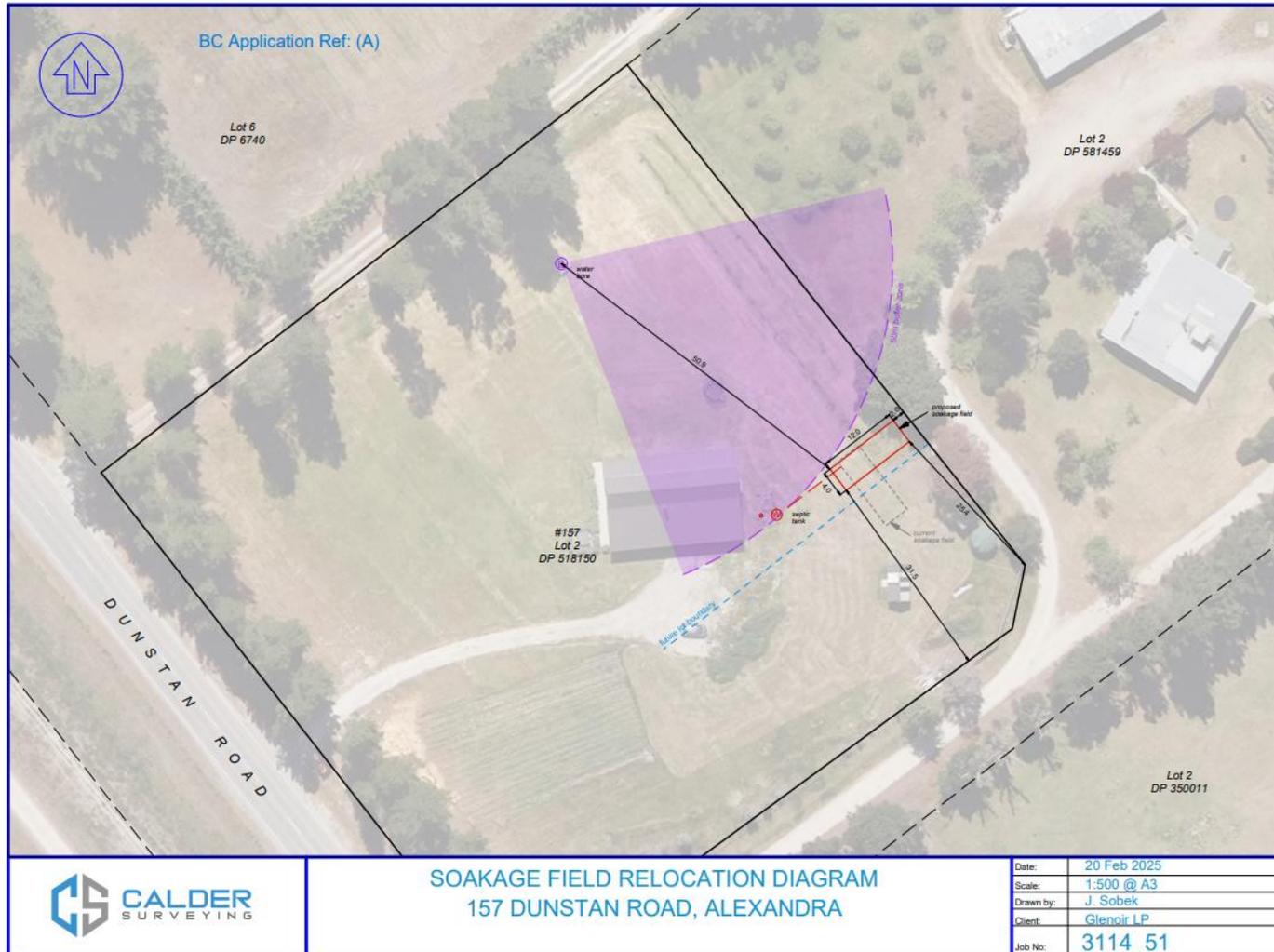
- Proposed 2.5m amenity zone adjacent to Dunstan Road Boundary
- Amenity zone with deciduous trees @ 8.0m centres
- Underplanted in low shrubs
- 1.2m post and rail fencing

studio3

CROSS SECTIONS
SCALE NOT TO SCALE
STATUS DRAFT NOT A WORKING DRAWING - NOT FOR CONSTRUCTION
DATE 05.04.2025
REVISION REVISION A

GLENOIR ESTATE - 157 DUNSTAN ROAD
NAVIGATE PROPERTY LTD

Appendix Four: Soakage Field Relocation Plan for RC 250055 (scanned image(s), not to scale)



Rebecca Wolt | Barrister

Email | rebecca@rebeccawolt.co.nz

Phone | 021 244 2950

21 September 2025

Glenoir LP – RC2500955

C/- Craig Barr, Waveform Planning

Via Email: craig@waveformplanning.co.nz

Dear Craig

RC250095 - 155 & 157 Dunstan Road, Alexandra – Scheme Plan Revisions

1. You have enquired whether amending the scheme plan lodged with the RC250095 application (**Application**) so as to include an additional circa 1643m² of land at 157 Dunstan Road and to reduce the number of residential lots to 28 is within the 'scope' of the Application as lodged, meaning the amendments are legally permissible changes that the applicant can pursue and are within the consent authority's (CODC) jurisdiction to consider and decide.
2. Your enquiry arises because the scheme plan submitted with the RC250095 application addresses only 155 Dunstan Road and proposes the creation of 30 residential lots.

Scope to amend RC250095 -Legal Considerations

3. The Courts have determined that amendments to design and other details of an application may be made until the close of hearing, but only if they are within the scope defined by the original application, and that the original application, together with any documents incorporated in it by reference, define the scope of the consent authority's jurisdiction. If an amendment goes beyond that scope, by increasing the scale or intensity of the proposed activity, or by significantly altering the character or effects of the proposal, a fresh application is required.¹
4. The Courts have enounced three 'tests' which should be applied to assess whether changes to an application are within jurisdiction, namely²:

¹ See for example, *Darroch v Whangarei District Council* A018/93

² See for example, *Coull v Christchurch City Council* EnvC C077/06. In *Brooklands Properties 2000 Ltd v Road Metals Co Ltd* EnvC C164/07 the Environment Court noted that the test as to whether an amendment to an application is fairly and reasonably within the scope or bounds of the original application is a question of intensity, scale, possibly duration, and location. The High Court, in *Atkins v Napier City Council* (2008) 15 ELRNZ 84 (HC) held that the test is whether the activity for which resource consent is sought, as ultimately proposed to the consent authority, is significantly different in its scope or ambit from that originally applied for and notified in terms of the scale or intensity of the proposed activity, or the altered character or effects/impacts of the proposal. In *Mead v Queenstown Lakes District Council* [2010] NZEnvC 207, the Court stated the useful

- 4.1. Do the changes increase the scale or intensity of the activity?
 - 4.2. Do the changes exacerbate or mitigate the impacts of the activity, both in terms of adverse effects and in terms of the relevant Plan and other superior documents?
 - 4.3. Would parties who have not made submissions have done so if they were aware of the changes?
5. Consideration of these matters are informative presently. Each is addressed below.

Scope of RC250095 Application

6. The RC250095 Application (AEE) is entitled '**155 Dunstan Road & 157 Dunstan Road** Resource Consent Application for a Comprehensive Residential Subdivision for 30 lots for residential activity'. The Application 'Site' is described in section 3.2 of the AEE, which includes the following statement:

*"As noted above, the adjoining site to the south-west at 157 Dunstan Road is also owned by the Applicant, and the record of title is in Attachment 7a. 157 Dunstan Road has a subdivision proposal with Council (RC 250055) which would result in a small boundary adjustment to the leg-in access, **and also involves an additional 1643m² land area being incorporated into the Application site**, as shown in Figure 3 and 4, and Table Two, above. At the time of making this application, that consent had been lodged (Council reference RC250055) but has not been granted. **For avoidance of doubt and to prevent issues of scope arising, those parts of the site which will become part of the Application (i.e. Lot 100 as shown on RC250055) site are included as part of the Application, and for the avoidance of doubt all land comprising 155 Dunstan Road and 157 Dunstan Road are identified on the Application form. The RT and consent notice are in Attachment 7a.**"*

(emphasis added)

7. It is clear from the above excerpts of the AEE, and the Figures referenced therein, that both 155 and 157 Dunstan Road form the Application 'Site', which comprises *all* of Lot 100 (created under RC250055), inclusive of the circa 1643m² of land at 157 Dunstan Road (proposed Lot 28 on the revised scheme plan) to which your inquiry relates. Notably, the RT for *both* 155 and 157 Dunstan Road are appended to and form part of the AEE. Accordingly, the circa 1643m² of land at 157 Dunstan Road is within the application 'envelope'. This being so, the scheme plan submitted with the Application as lodged does not address this land, and proposes the creation of 30, not 28 residential lots. To ascertain whether the 157 Dunstan Road land can be included in the scheme plan and the number of residential lots proposed reduced it is appropriate to apply the legal 'tests' summarised at paragraph 4 above:

indications whether an application is within scope include: whether the intensity and scale of any adverse effects would be greater or lesser as a result of the change in the proposal, and whether it is fairly and reasonably contemplatable or plausible that other informed and reasonable persons not before the consent authority but interested in the area would have still stayed out of the proceeding if they knew of the change to the proposal.

- 7.1. Do the changes increase the scale or intensity of the activity? While the changes promote the inclusion of additional land within the scheme plan (the circa 1643m² at 157 Dunstan Road), the changes have the effect of *reducing* the scale and intensity of the proposal, as opposed to increasing or significantly altering it, by reducing the density /number of residential lots that would be created (from 30 to 28) under the proposal and increasing average residential lot size (from circa 1377m² to 1532m²). The character of the effects arising from the changed proposal are not altered (albeit the scale and intensity is reduced).
- 7.2. Do the changes exacerbate or mitigate the impacts of the activity, both in terms of adverse effects and in terms of the plan and other superior documents? The changes have the effect of *reducing* the effects of the proposal, including effects on character and amenity and demand for infrastructure services, by reducing density/lot number/increasing lot size, and they *better align* the proposal with the comprehensive development provisions in the District Plan, which promote a 1500m² average lots size, which the changes achieve.
- 7.3. Would parties who have not made submissions have done so if they were aware of the changes? Given that set out above (reduced scale, intensity, effects, and better alignment with the District Plan), it is highly unlikely that the changes would cause parties who have not already done so to submit on the proposal. With regards to the proposed amendment to the scheme plan to include an additional 1643m² of land at 157 Dunstan Road (as proposed Lot 28), this land is contiguous with 165 Dunstan Road and the balance of 157 Dunstan Road. The owners of 165 Dunstan Road, Alison and Ross Meldrum, have already submitted on the application, raising general concerns that have continued relevance to the changed proposal. The applicant owns the balance of 157 Dunstan Road. Accordingly, no new/additional parties are affected by the changes.
8. Given the above, amending the scheme plan lodged with the RC250095 Application so as to include an additional circa 1643m² of land at 157 Dunstan Road and to reduce the number of residential lots to 28 *is* within the 'scope' of the Application as lodged, meaning the amendments *are* legally permissible changes that the applicant can pursue.
9. Yours faithfully



Rebecca Wolt | Barrister

URBAN DESIGN PEER REVIEW

RC250095 155 DUNSTAN ROAD

Prepared for Central Otago District Council, Att. Tanya Copeland

29 September 2025

Applicant:	Glenoir LP
Application :	Subdivision resource consent and land use consent to establish a 30 Lot, Comprehensive Residential Development within the Large Lot Residential Zone.
Location:	155 Dunstan Road, Alexandra
Zoning:	ODP Plan Change 19 (decisions version): Large Lot Residential Zone (subject to appeals) At time of lodgement: Rural Resource Area, Rural Residential Zone
Activity Status:	Restricted Discretionary

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Document Quality Assurance

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Reviewed by:	Nicole Bitossi Urban Designer Associate Principal Boffa Miskell Limited
Status: FINAL	Revision / version: [0] Issue date: 29 September 2025
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1.0 Introduction

- 1.1 I have been engaged by Central Otago District Council ('CODC') to undertake an Urban Design peer review in relation to an Application for a Comprehensive Residential Development ('CRD') at 155 Dunstan Road, Alexandra.
- 1.2 The site is located within the Rural Residential Zone of the Operative Central Otago District Plan and is within the Large Lot Residential Zone under Plan Change 19 which remains subject to Environment Court appeals. Overall, it is understood the application requires consent as a Restricted Discretionary Activity as a CRD within the Large Lot Residential Zone.
- 1.3 The following information was submitted with the Application and has been considered in preparing this peer review:
- Resource Consent Application, including the Assessment of Environmental Effects (AEE) prepared by Waveform Environmental Planning, dated April 2025
 - Concept Masterplan and Road and Access Sections prepared by Studio 3, dated 09/04/2025
 - Revised Scheme Plan prepared by Calder Surveying, dated 17/09/2025.

Note: No updated AEE and Concept Masterplan was submitted to support the revised scheme plan.

To inform this preparation of this report, a site visit was undertaken to the subject site and its surrounds on 22 September 2025.

2.0 Site and Context

- 2.1 On the eastern side of Dunstan Road, the site and its surrounds are characterised by rural lifestyle properties set within an open landscape, many bordered by exotic shelter belts. Small clusters of buildings comprised of houses and sheds are dispersed across the landscape, often surrounded by amenity planting that screens them from the road. Beyond the flat land surrounding Dunstan Road, the ground rises steeply to a ridgeline to the east. The slope is generally grassed with a covering of semi-mature pine trees.
- 2.2 Further southeast on Dunstan Road, rural lifestyle properties are interspersed with pockets of commercial and industrial activities, before transitioning into the low-density neighbourhood that forms current urban edge of Alexandra.
- 2.3 The lot structure of the site and surrounding sites is generally linear rectangular, with the short frontages to Dunstan Road and the length of the properties extending approximately 350m back from the road. The site, and most of the properties surrounding has been zoned Large Lot Residential Zone under Plan Change 19, and as such, this area is anticipated to transition from rural lifestyle to low-density neighbourhoods in the future.
- 2.4 On the opposite side of Dunstan Road, beyond the Otago Central Rail Trail, land is zoned for Medium Density Residential zoning allowing for minimum lot sizes of 200m². Construction is currently underway.

- 2.5 The Alexandra Golf Course is located approximately 250m to the northwest, and there is a high school, public open space and recreational activities within proximity of the site. The Central Otago Rail Trail runs adjacent to the southern side of Dunstan Road, providing an important walking and cycling connection from Alexandra to Clyde. It forms part of a well-connected and well-used shared path network that provides connectivity around Alexandra for recreation and commuters.
- 2.6 The site itself is a rear site, located behind the neighbouring property at 157 Dunstan Road. The site is generally rectangular in shape, and comprises two distinct landforms: a predominantly flat 3ha area and a gently rising 1ha portion located at the base of, and extending up the hill slope at the northeastern boundary
- 2.7 157 Dunstan Road is also owned by the applicant and is subject to a six-lot subdivision consent application (RC250055). The proposed layout is comprised of three lots that front Dunstan Road, and three lots behind that adjoin the boundary of the site. The size of these lots range from 1530m² to 2270m² and are consistent with the expectations of the Large Lot Residential Zone.



Figure 1: Site and Context



Figure 2: Scheme Plan for 155 Dunstan Road

3.0 The Proposal

- 3.1 The proposed development is described in detail within the Resource Consent application. In summary, it comprises 28 residential lots and rights of way, a road and an open space to vest in Council, and a road reserve to enable a future road connection to the southeast.
- 3.2 155 Dunstan Road is a rear lot, located behind 157 Dunstan Road which has a frontage to the road. A single road entrance provides access to the subject site from Dunstan Road. The proposed road runs along the southeastern boundary of 157 Dunstan Road before curving into the site to continue as a central internal spine road that terminates in a cul-de-sac. Residential lots are proposed to front this internal street, with additional rear lots located along the northern side of the site, accessed via rights of way extending from the central road.
- 3.3 Residential lot sizes range from 840m² (670m² net) to 1,940m², with an average lot size of 1,532m².
- 3.4 A 1,410m² reserve is proposed to be vested in Council near the entrance of the site, positioned at the intersection of the proposed road and the future road connection to the south. It is understood a meeting was held with the Council's parks manager who supported the concept of a neighbourhood park on this site, and its proposed location.

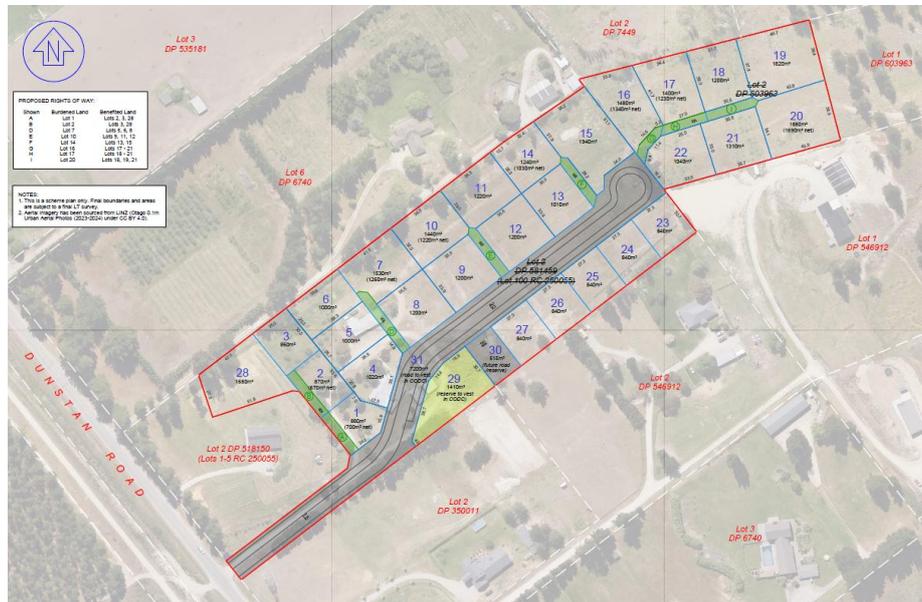


Figure 3: Scheme Plan

4.0 Statutory and Non-Statutory Context

- 4.1 The Application documents outline the relevant statutory context including the Resource Management Act ('RMA') and the Operative Central Otago District Plan ('ODP').
- 4.2 The site is currently zoned Large Lot Residential Zone under the Plan Change 19, which remains subject to Environment Court appeals. Overall, it is understood the application requires resource consent as a Restricted Discretionary activity for several reasons as detailed in the AEE. Those which are relevance to urban design include:

- Comprehensive Development (LLRZ-R12)

As outlined in the AEE that was submitted with the original proposal, the applicant also sought the following:

- Rule LLRZ-S4 permits the building coverage of any site up to 30%. A building coverage of 35% was sought on Lots 1 to 4.
- Rule LLRZ-S5 requires a minimum setback of 7m from a boundary with a road. A road boundary setback of 4.5m was sought for Lot 1 in relation to the future road.
- Rule LLRZ-S6 setback of a minimum of 3m from an internal boundary. An infringement to this rule is sought to enable accessory buildings for lots 1-4.

- 4.3 In the absence of an updated AEE addressing the revised proposal, it is unclear whether these reasons for consent are still applicable. However, the reduction in the

number of lots and the increase in lot sizes suggest that some may no longer be relevant.

- 4.4 The objectives and policies of the zone, and CRD matters of discretion relevant to urban design have been consolidated into the following headings that will form the basis of this assessment:
- **Neighbourhood Character:** *How the proposal responds to both the existing site characteristics and character of the surrounding area, and future character anticipated by the zone.*
 - **Connectivity with wider movement networks:** *How the proposal integrates with transport networks and provides opportunities for future connectivity.*
 - **Streetscape and public realm:** *The location, extent and quality of public open spaces and streetscapes.*
 - **Relationship with Neighbours:** *How the proposal manages its relationship with neighbouring properties through the design of lot sizes, building placement, and boundary treatments.*

5.0 Urban Design Analysis

Neighbourhood Character

How the proposal responds to both the existing site characteristics and character of the surrounding area, and future character anticipated by the zone.

- 5.1 The proposal aligns with the density expectations of the zone through the CRD provisions, which enable one dwelling per 1500m² of gross site area. Lot sizes range from 840m² to 1940m², which balances smaller and larger lot sizes, provides opportunity for a diversity of housing types and variation in built form, while also allowing space for an open space and future road connections that provide wider community benefits for recreation and connectivity.
- 5.2 Lots 1 and 2 have the smallest net site areas and represent the highest density within the development. These lots are located to the rear of the neighbouring property at 157 Dunstan Road. Lot 2 is not visible from the public realm, while Lot 1 will be visible from the proposed internal road and public open space.
- 5.3 The applicant is seeking consent to reduce the minimum road setback from 7m to 4.5m for Lot 1. This is considered acceptable from an urban design perspective. For the smaller lots within the CRD, applying a 7m setback would shift built form further back on the lots, closer to neighbouring boundaries. While a 4.5m setback would result in a slightly more urbanised and less spacious streetscape within the development, it would likely result in improved outcomes for both internal and external neighbours. For lots located along the site boundaries, the reduced setback would also enable opportunity for a more spacious and landscaped interface with adjacent lower-density properties.
- 5.4 Most lots within the development are between 1,000m² and 1,400m². While no specific building designs or placements have been provided at this stage, compliance of future buildings with the zone's maximum building coverage of 30% is expected to maintain a degree of openness across the site and allow for landscaping.

- 5.5 While the proposal aligns with the density expectations of the zone, it will introduce a low-density urban environment within an area currently characterised by established rural residential properties and a high ratio of open space to built form. To support integration with the existing rural residential character, a building setback of 10m from side and rear boundaries is recommended. This would allow for landscaping and help maintain a sense of openness around the site edges, providing a transition to the lower-density rural residential properties on each side. This is discussed further under the heading 'Relationship to Neighbours'.
- 5.6 The eastern portion of the site (Lots 16-22) is a discrete area of Large Lot Residential Zoned land that projects into the adjoining Rural Residential Zone. Unlike the remainder of the site, which is generally flat, this area slopes upward, increasing its visibility from the surrounding area. Proposed lot sizes vary: Lots 16–18 and 21–22 range from approximately 1,040–1,400m², while Lots 19 and 20 are closer to 1,800m².
- 5.7 In response to the topography and sensitivity to the adjoining rural residential interface, it is recommended that one lot be removed from this part of the site to reduce development intensity and better manage the transition to the rural character. There appears to be scope to offset this change by dividing Lot 15, located within the flatter portion of the site, into two lots. This would maintain overall yield while supporting a more appropriate interface at the eastern edge.

Connectivity with wider movement networks

How the proposal integrates with transport networks and provides opportunities for future connectivity.

- 5.8 Many of the existing land parcels along the eastern side of this section of Dunstan Road are of sufficient size to accommodate CRD development. These sites are typically rectangular and linear in form, with the short frontages of approximately 100–115 metres to Dunstan Road and extending up to 350 metres in depth perpendicular to the road. The shape and dimensions are similar to those of the subject site.
- 5.9 There is a risk that future CRD developments may occur piecemeal, with each site introducing a single central access road connecting directly to Dunstan Road. This pattern has the potential to result in a series of disconnected cul-de-sacs, limiting connectivity and potential for an integrated street network beyond Dunstan Road itself.
- 5.10 The CRD provisions within the Large Lot Residential Zone enable increased residential density where a demonstrable public benefit is provided. One of the matters of discretion under LLRZ-R12c includes consideration of “increased opportunities for connectivity” as a benefit to the wider community.
- 5.11 Proposed Lot 30 has been identified as a 20m corridor that facilitates a potential future road connection to the adjoining property to the south. This connection would support future integration should adjacent land be developed, and is considered appropriate from an urban design perspective, contributing to a more permeable and legible movement network.
- 5.12 To support a wider integrated movement network to the north, it is recommended that provision also be made for a future road connection to the northwestern boundary (i.e. extending to the boundary of 165 Dunstan Road). In combination with the southern connection already proposed via Lot 30, this would enable potential linkages to

adjoining properties to support a more connected movement network across the wider area.

- 5.13 In terms of connectivity for active modes, the Central Otago Rail Trail runs along the western side of Dunstan Road and is accessible directly opposite the site entrance. Access requires crossing Dunstan Road, which typically has low traffic volumes but relatively high vehicle speeds. The Rail Trail provides a cycle connection between Alexandra and Clyde and also links into a wider network of shared paths throughout Alexandra that are well used for recreational and commuter purposes.

Streetscape and public realm

The location, extent and quality of public open spaces and streetscapes.

- 5.14 The development is accessed via a single, linear road extending from Dunstan Road at the western end, and terminating in a cul-de-sac and the eastern end. The Studio 3 drawing set indicates an approximately 15m wide road corridor for the portion between Dunstan Road and the southern boundary of 157 Dunstan Road. This section includes a 6m carriageway, a 3m wide shared path on one side, and space for grassed swales and street tree planting on both sides. The absence of kerbs and the inclusion of berms and a single shared path reflect a more rural streetscape character, consistent with the surrounding environment.
- 5.15 Beyond 157 Dunstan Road, the road widens to a 20m wide corridor and becomes more urban in character, with 1.5m wide footpaths on both sides, kerbs and channels.
- 5.16 Both road typologies allow adequate space for planting and large-scale street trees which will contribute to a safe and attractive streetscape environment, as shown within the landscape design package.
- 5.17 While building designs on individual lots have not been provided as part of this resource consent, the proposal includes post-and-rail fencing with clipped hedges along front boundaries. This approach is consistent with the rural character of the area and will allow for passive surveillance and interaction with the street, while maintaining a degree of privacy for future residential activity within the lots.
- 5.18 Lot widths are sufficient to accommodate a dwelling with a front door, garage, and a generously sized habitable room facing the street that can provide passive surveillance of the street.
- 5.19 LLRZ-S5 standard requires a 7m building setback from a road boundary for safety and support a sense of spaciousness that reflects the rural character of the area. While appropriate for larger lots, compliance with this setback for smaller lots enabled as part of a CRD could mean dwellings are pushed back toward rear boundaries, which could affect privacy and openness when viewed from adjoining properties.
- 5.20 Although building footprints have not been proposed, a reduced setback of approximately 4.5m from front road boundaries may be appropriate for lots with a net site area under 900m². This would still allow space for tree planting and maintain a reasonable sense of openness within front yards, without compromising neighbours to the rear.
- 5.21 A 1,410m² public open space is proposed to be vested in Council. While smaller than the typical 'Neighbourhood Park' described in the Spaces and Recreation Strategy, the reserve is considered appropriate in the context of the development and is

expected to provide benefit to future residents and the wider community. It is bounded by roads on two sides, which supports visibility, access, and informal surveillance. The area is of sufficient size to accommodate seating, informal gathering, and potentially modest play equipment. Given most private lots are large enough for a kickabout space and outdoor seating, the role of the reserve as community space is considered more relevant than its overall size. Additional recreational facilities, including golf, tennis, and playing fields, are located within reasonably close proximity of the site.

- 5.22 The Concept Masterplan prepared by Studio 3 includes stone entry walls with integrated signage at the Dunstan Road entrance. This treatment gives the impression that the road and open space is private, which may discourage public access. As both the open space and internal road are intended for public use, it is recommended that the entry gates and associated signage be omitted.

Relationship with neighbours

How the proposal manages its relationship with neighbouring properties through the design of lot sizes, building placement, and boundary treatments.

165 Dunstan Road

- 5.23 165 Dunstan Road is of a comparable size to the subject site. The front portion is enclosed by shelterbelt planting, which screens what appears to be a horticultural commercial land use. The dwelling is located approximately 240m back from the road and 30m from the shared boundary with the subject site. Surrounding the dwelling, the shelterbelt transitions to amenity planting, which partially filters views between the two properties. However, intermittent gaps in the vegetation allow for direct visual connections. The dwelling appears to be oriented northward, away from the site, with a limited number of small rear-facing windows directed toward the subject site as can be seen in Figure 4.
- 5.24 An additional building is located at the easternmost extent of the neighbouring property, approximately 5m from the shared boundary. Based on the site visit, it was unclear whether this structure is a dwelling or a shed. Regardless of its function, it also appears to be oriented northward, facing away from the subject site.
- 5.25 The owners of this property submitted in opposition to the proposal, citing disproportionate loss of their future and present amenity values and concern over use of their driveway which is located close to the shared boundary.
- 5.26 It is important to note that as this area transitions from rural to urban over time as anticipated under Plan Change 19, an intensification, even to low-density residential development will result in a number of new dwellings within proximity of the boundary. The proposed development includes eight lots adjoining the shared boundary (including Lot 28), with lot sizes ranging from approximately 860m² to 1,940m². While the proposed density aligns with the expectations of the CRD, this configuration likely results in one or two additional units that would be located closer to the boundary than what could be anticipated under a conventional 1,500m² subdivision pattern typically anticipated within the Large Lot Residential Zone.
- 5.27 As previously noted, a 10m building setback is recommended from this boundary to allow space for planting that can filter and eventually screen views of future dwellings reducing privacy and dominance effects to these neighbours.



Figure 4: Neighbouring house at 165 Dunstan Road, viewed from within the site.



Figure 5: Neighbouring house at 165 Dunstan Road, viewed from within the site.

147 Dunstan Road

- 5.28 147 Dunstan Road adjoins the site on the southeastern side. The house is set back approximately 80m from the shared boundary. The house is oriented toward the site to maximise solar access, however the ground floor and outdoor living area is largely screened from view from the site by surrounding hedge planting. Upper floor windows are oriented toward the site. When viewed from the site, the house is set back behind a paddock that forms part of its property.
- 5.29 The owners of this property submitted in opposition, generally on the basis of the proposed density that was contrary to the provisions of the district plan, with too many

infringements. Since the submission, there have been several changes to the proposal which means it now aligns with the expectations of the zone.

- 5.30 The part of the proposal adjacent to this adjoining property is the proposed entrance road and open space. There are no proposed residential lots located along the shared boundary. As such, it is considered a level of openness is able to be retained, and the street tree planting and future planting of the open space will allow for a reasonable level of outlook amenity.



Figure 6: neighbouring house at 147 Dunstan Road, viewed from within the site.

149 Dunstan Road

- 5.31 It is understood this neighbour has given affected party approval a previous version of the proposal. There have been minor changes to the proposal since then, that result in minimal changes to the interface. It is understood the applicant intends to provide an updated written approval, prior to the issue of the S42A report.

149a Dunstan Road

- 5.32 149a Dunstan Road is located southeast of the site and is located within the Rural Residential Zone. The dwelling is setback 35m from the eastern tip of the site. It is at a higher elevation as can be seen in Figure 7, and looks down over the site.
- 5.33 The owners of this property submitted in opposition as the proposal was at odds with the density anticipated within the zone, dominance to adjoining sites, and offered no wider community benefits or connectivity.
- 5.34 Since this submission, changes have been made to align with the density expectations of the CRD provisions of Plan Change 19, with a new public open space proposed.

Through this report, several recommendations have been made to improve the rural interface at the eastern end of the site, and provide for wider connectivity, which would partially address the concerns raised by this submitter.



Figure 7: Neighbouring house at 149a Dunstan Road, viewed from within the site.

6.0 Conclusions

- 6.1 In conclusion, the proposal can be supported in principle in relation to urban design matters, subject to several recommended amendments. The proposal is considered to be consistent with the density requirements of a CRD within the Large Lot Residential Zone, and provides community benefits in terms of a public open space and a future road connection providing opportunity for wider connectivity.
- 6.2 To align with the objectives, policies and matters of discretion, the following design changes are recommended. These will enable the development to better respond to the characteristics of the site, character and amenity of the wider surrounding area, and to enable better connectivity for future development on neighbouring sites:
- One lot be removed from eastern end of the site (Lots 16-22) to better manage the transition to the surrounding rural character. There appears to be scope to offset this by dividing Lot 15, located within the flatter portion of the site, into two lots. This would maintain overall yield while supporting a more appropriate interface at the northeastern end.
 - A 10m building setback from external site boundaries is recommended assist with the integration of the development with the existing rural character, and allow space for planting that can filter, and eventually screen views of future dwellings reducing privacy and dominance effects to neighbouring properties.

- To support a wider integrated movement, it is recommended that provision also be made for a future road connection to the northwestern boundary (i.e. extending to the boundary of 165 Dunstan Road).

Created 15/10/2024



Engineering Advice

Resource Consent Number: RC 250095
 Planner/Overseer: Tanya Copeland
 Short Description/Proposal: Subdivision Consent to subdivide the Property at 155 and 157 Dunstan Road and an additional 1ha of the Property at 129 Gilligans Road (together the site) to create 27 Lots for residential activity, access lots and an allotment for a recreation reserve.



General

Commentary:

We are seeking legal guidance around when conditions do or do not violate s108AA. However, in the meantime our position is that we can still require outdated or malfunctioning services to be updated as part of the Resource Consent and subdivision certification processes.

Conditions:

Created 15/10/2024



Unless modified by other conditions, all designs and approvals are to be in accordance with NZS 4404:2004 and the July 2008 CODC Addendum. Together these two documents form the Council's Code of Practice for subdivision.

Prior to commencement of any physical work the consent holder must apply for and receive council Engineering Acceptance (EA) via the CODC online portal at:

CODC Home > Services > Planning > Land Development and Subdivision Engineering

This EA application must include:

- Confirming who their representative is for the design and execution of the engineering work.
- Provision of design reports, calculations, specifications, schedules, and drawings, as applicable.

Either a CODC letter of full Engineering Acceptance (EA) or a CODC exemption letter is required prior to 224c.

Producer Statements/Certificates where appropriate are to be submitted as per NZS 4404:2004 in the form of:

- Schedule 1A,
- Schedule 1B,
- Schedule 1C, and
- Standalone Schedule 1B for 3 waters work.

As-built drawings are to be lodged with the Council in accordance with clause 1.5.10(b) of NZS 4404:2004 and must comply with Council's "Specifications for as-built drawing documentation version 3.1". The as-built drawings are to be provided in *.dxf or *12da, and in *.pdf file format. New Zealand Vertical Datum (NZVD2016) must be used.

Any easements required to protect access or for access to services must be duly granted or reserved.

Potable Water Supply

Commentary:

The applicant has provided written confirmation from Council's 3 Waters Team that Council has budgeted to extend water reticulation along Dunstan Road which will be able to serve the proposed subdivision.

The proposed subdivision will only be serviced if this extension of Council's network is carried out prior to the expiry of this consent.

Conditions:

Once Council has extended a watermain along Dunstan Road to the subdivision, a new HDPE (PE100) DN125 (~106mm ID) principal watermain must be installed from the Dunstan Road watermain, along the north side of the road serving the subdivision, and a HDPE (PE100) DN63 (~53mm ID) rider main must be installed on the south side. Hydrants must be installed in accordance with SNZ PAS 4509:2008.

Created 15/10/2024



Individual standard HDPE (PE100) DN25 (~21mm ID) residential water connections must be provided off the new principle watermain along the north side, and off the rider main on the south side, such that no residential laterals are under the road. An Acuflo toby and meter assembly must be installed on the street side of each street-property boundary. If water toby boxes must be within vehicle accessway/crossings because other solutions are not feasible, they must be cast iron to support sustained traffic.

A manifold must be installed on a HDPE (PE100) DN63 (~53mm ID) from the new principal watermain up to the road boundary of the rights-of-way, and new individual standard HDPE (PE100) DN25 (~21mm ID) residential water connections installed from the manifolds to serve each of the lots without street frontage.

Advice notes:

As per condition 2. Detailed water reticulation design must be assessed and granted Engineering Acceptance (EA) before physical works commence.

An approved 'Application to Connect' submission is required prior to connecting to Council's potable water network.

Firefighting Water Supply

Commentary:

Hydrants will need to be installed on the new water network for firefighting in accordance NZS4404 and SNZ/PAS4509:2008. I have specified this in the water supply conditions above.

Wastewater

Commentary:

The applicant has provided written confirmation from Council's 3 Waters Team that Council has budgeted to extend wastewater reticulation along Dunstan Road which will be able to serve the proposed subdivision.

The proposed subdivision will only be serviced if this extension of Council's network is carried out prior to the expiry of this consent.

Conditions:

Once Council has provided for wastewater servicing along Dunstan Road to enable a connection point for the subdivision, a new 150mm wastewater main must be installed along the central road serving the subdivision.

New individual standard 100mm residential wastewater connections must be installed from the new 150mm wastewater main in the central road with cleaning eyes installed on the street side of each street-property boundary for each lot with road frontage. The connections for rear lots must have cleaning eyes installed at the right-of-way boundary and must be extended to the buildable/nett area of the lots along the rights-of-way.

Created 15/10/2024



If, to the satisfaction of the Group Manager – Three Waters Department (or their successor), engineering analysis demonstrates a full gravity sewer is unsuitable, the 3 waters department will provide permission for a full or partial (at 3 waters discretion) pressure sewer design with boundary kits, collection tanks, and manifolds as applicable. Detailed wastewater reticulation design must still be assessed and granted Engineering Acceptance (EA) before physical works commence.

An approved 'Application to Connect' submission is required prior to connecting to Council's wastewater network.

Stormwater

Commentary:

Stormwater reticulation will not be provided.

Stormwater from within Lots will be disposed of within Lots by onsite soakage, and stormwater from vested roads will be disposed of by Cauldwell-type soakpits.

Conditions:

Stormwater from impervious surfaces within each of proposed residential lots must be stored for beneficial reuse or disposed of by soak-pit designed by a suitably qualified and experienced person within the boundary of the lot. This requirement must be secured by means of a consent notice attached to the new titles.

Access

Commentary:

There is a typo in the Carriageway Consulting report dated 28 August 2024 referring to NZS4404:2020.

While Council Central Otago is moving towards NZS4404:2010, we do not intend to adopt it until such a time as we produce a suitable CODC addendum for it. As such, while Carriageway Consulting's report has based their assessment on the 2010 version, I will base my/our own assessment on the 2004 version and our 2008 Addendum.

I believe the 2010 version is intended for more dense urban development, so is permissive of a lower quality of service than our 2004 version addended in 2008, and why the default 4404:2010 is thus not appropriate for Large Lot Residential zoning in CODC.

The Proposed subdivision will serve around 30 lots thus the central road should be constructed to the standard of 'Local Road Residential' from Table 3.1 of CODC's 2008 Addendum.

I have listed the proposed variations from the Standard, given a preliminary assessment note in italics, then listed a response as a result of Discussion amongst Council's Engineering Team. Proposed variations:

Section A / Entry / West

- Standard reduction to 15m road reserve entry road – *not acceptable. Applicant owns both sections so the 20m required standard is easily achievable. This is a large lot*

Created 15/10/2024



rural residential zone so reduction to the intense urban 15m 2010 standard is unjustified.

- No parking lanes through entrance, but 1x 2.5m parking lanes required – *acceptable due to the fact it's a leg-in meaning there are no lots served directly from this section.*
- Berms of variable width, non-compliant for most of the length, where 2x 4.25m is required – *acceptable noting this improves footpath safety in this location.*
- Stormwater management by 2x 1.5m swales (with suitable approved edgebreak), where kerb & channel is required – *acceptable on one side only.* i.e. Partially Acceptable. We will require that standard kerb'n'channel be installed on the north side between the road and cycle path to act as a physical barrier between vehicles and pedestrians.
- 3m shared (cycles/peds) footpath, where 2x 1.5m is required – *Acceptable.* We consider this Acceptable. Total footpath width is compliant, and the wider width better facilitates shared walking/cycling.

Section B / Spine / East

- Low-profile / mountable kerb and channel, where standard profile is required – *Unacceptable.*
Not Accepted. Standard kerb'n'channel is required to discourage parking on footpaths, berms etc..
- Berms of 3.5m + 2.5m, where 2x 4.25m is required – *acceptable as the reduced berm width has been used to put in another parking lane.*
- 2x 2.5m parking lanes, but only 1x 2.5m is required – *Acceptable.*
We consider this Acceptable. More parking is helpful.

Sections C / rights-of-way:

- 3m carriageway, where 4m is required – *Acceptable*, as although it is not in keeping with NZS4404:2004, it is in keeping with NZS4404:2010 which noting passing bays have now been added, in this scenario we are comfortable accepting.
- Berms of 2x 1.5m, but 2x 1.0m is required – *Acceptable* (or would be if it would likely not be reduced to increase the carriageway width).
We consider this Acceptable.
- Lots 18 to 23 (6 lots) are proposed to be served by one ROW, where our standards require that above 4 Lots the access is constructed to cul-de-sac standard and vested – *unacceptable.* CODC infrastructure dept and 3 waters dept both require that the cul-de-sac be extended to serve these lots. This is comfortably constructable and will provide a better outcome for the community and will better support any future growth. I have noted this below in I).

I have specified the road be constructed to our standards, but with exceptions above I have noted as Acceptable.

The Carriageway Consulting Report recommends that the intersection with Dunstan Road be upgraded in accordance with NZTA Diagram D or E standard. I have recommended E in my condition below, and have also specified that the full width of Dunstan Road at the

Created 15/10/2024



intersection be upgraded to asphaltic concrete. Asphalt has better shear strength than chipseal, thus is far better at dealing with the stresses from turning vehicles, particularly heavy vehicles.

Noting the zoning change now motivating development on both sides of this subdivision, the proposed single road future road reserve is considered inadequate. A through road/ reserve is required.

Achieving compliant width through entry avenue requires a boundary adjustment as noted in the applicants provided concept masterplan. The applicant also owns both sides of the necessary boundary adjustment.

- I) **Prior to issue of resource consent**, the proposed road layout must be redesigned such that the cul-de-sac serves all lots in the west end of the subdivision, rather than to a right-of-way.
- II) **Prior to issue of resource consent**, the proposed road layout must be redesigned such that allowance for a 20m future road reserve is provided. This must provide for a future through-road running parallel to Dunstan Road in the eastern half of the subdivision.
- III) **Prior to issue of resource consent**, the boundary adjustment needed to provide a compliant width through entry avenue must be formalised and the proposed road layout redesigned accordingly.

Conditions:

Allowance for interconnectivity must be provided. This will involve 2x future 20m road reserves to be maintained as open space till such time as the addendum Table 3.1 'Residential' standard future through roads are realised.

The cul-de-sac shall be asphaltic concrete and extended all the way to provide direct access to the eastern most lots of the development without need for a ROW.

Prior to 224c certification, the leg-in (south-western) section of the proposed road to serve the subdivision must be constructed and vested in accordance with the "Residential" Local Road standard under Table 3.1 of Council's 2008 addendum to NZS 4404:2004, with the following specific requirements and modifications:

- Legal width of 20m minimum (necessitates boundary adjustment see pre-consent conditions).
- Formed carriageway width of 6m.
- Subgrade requirements and metal depths to NZS4404:2004 and Council's July 2008 Addendum standards.
- Carriageway to be minimum 30mm asphaltic concrete, or 2-coat chipseal.

Created 15/10/2024



- Minimum 3.0m wide concrete or asphaltic concrete shared footpath-cycleway must be constructed on the North side of the road and extended out to Dunstan Road to facilitate pedestrians and cyclists to cross to the Rail Trail.
- Standard kerb and channel on the north side of the of the carriageway over 75mm compacted depth AP40 metal.
- Shallow side-swales on the south side of the carriageway, and concrete edge-break protection to the satisfaction of Council's Infrastructure Manager.
- Berms of 100mm depth clean topsoil at edge of road boundary formed with a 4% crossfall, trimmed and grassed to a mowable standard, or planted and landscaped.
- Stormwater must be disposed of by soakpit within the road reserve.
- LED street lighting in accordance with NZS 4404 and the CODC Public Spaces Lighting Policy.
- No parking lane is required.
- All necessary traffic signs and street markings are to be provided

Prior to 224c certification, the central (north-eastern) section of the proposed road to serve the subdivision must be constructed and vested in accordance with the "Residential" Local Road standard under Table 3.1 of Council's 2008 addendum to NZS 4404:2004, with the following specific requirements and modifications:

- Legal width of 20.0m.
- Formed carriageway width for traffic of 6.0m, and 2 parking lanes of 2.5m width.
- Subgrade requirements and metal depths to NZS4404:2004 and Council's July 2008 Addendum standards.
- Carriageway to be minimum two-coat chip seal, standard concrete, or 30mm depth asphaltic, including parking lanes.
- A 19.0m diameter asphaltic concrete turning circle at the head of the cul-de-sac.
- Minimum 1.5m wide concrete or asphaltic concrete footpaths must be constructed on both sides of the road and extended around the cul-de-sac head.
- Standard kerb and channel on both sides of the carriageway over 75mm compacted depth AP40 metal, or, with the approval of Council's Infrastructure Manager, dish-channels between traffic and parking lanes.
- Berms of 100mm depth clean topsoil at edge of road boundary formed with a 4% crossfall, trimmed and grassed to a mowable standard, or planted and landscaped.
- Stormwater must be disposed of by standard mudtanks and Y capped connections to soakpits within the road reserve.
- LED street lighting in accordance with NZS 4404 and the CODC Public Spaces Lighting Policy.
- All necessary traffic signs and street markings are to be provided.

Prior to 224c certification, the rights-of-way servicing proposed rear lots must be constructed to the Right-of-way standards in Table 3.1 of Council's 2008 Addendum to NZS 4404:2004 (2 – 4 Lots), as modified by the following:

- Legal width of 6.0m.
- Formed carriageway width of 3.0m.

Created 15/10/2024



- Subgrade requirements and metal depths to NZS4404:2004 and Council's July 2008 Addendum standards.
- Stormwater must be disposed of by soakpit within the right-of-way.
- Carriageway to be minimum 30mm asphaltic concrete.
- For flexible pavements a concrete nib kerb must be provided along the high side of the carriageway.
- Standard kerb and channel must be provided along the lower side of the carriageway.
- Sealed vehicle entrances must be provided within the right-of-way to the boundary of Lots served from the right-of-way in accordance with Part 29 of Council's Roading Policies 2015.
- Heavy duty/commercial vehicle crossing to be installed from the central vested road to the rights-of-way in accordance with Part 29 of Council's Roading Policies 2015. Kerb design to include a minimum of 75mm concrete thickening and 3 re-bars placed central to reinforce the kerb line. Fibre reinforced concrete is a suitable alternative to standard concrete and 3 rebar. 150mm of compacted AP40 under the crossing.
- Berms of 100mm depth clean topsoil between the footpath/kerb and road boundary formed with a 4% crossfall, trimmed and grassed to a mowable standard. Alternatively, berms may be surfaced with schist or similar low maintenance material.
- Passing bays are required for rights-of-way longer than 50m in accordance with NZS4404:2004 and Council's 2008 Addendum.

Prior to 224c certification, the intersection from Dunstan Road to the proposed western section of the road to serve the subdivision must at minimum be constructed/upgraded in accordance with Central Otago District Plan Figure 12.3 and New Zealand Transport Agency / Waka Kotahi Diagram E & Perspective E standard. The entire width of Dunstan Road at the intersection must be upgraded to asphaltic concrete for a length not less than 36m and to the satisfaction of Council's Infrastructure Manager.

Prior to 224c certification, new individual vehicle entranceways/crossings from the proposed central (eastern) road serving the subdivision must be constructed in accordance with the requirements of Part 29 of Council's Roading Policies January 2015.

Advice note: Prior to upgrading or constructing a vehicle crossing, a 'Vehicle Crossing Application' submission and approval is required.

Power & Telecommunications

Conditions:

17) Prior to 224c certification, Operational power and telecommunication services must be provided underground to the proposed lots, and for rear lots, ducts extended to the buildable area via the rights-of-way such that these services may be supplied at time of dwelling construction.

Flood Risk & Geotech

Commentary:

Created 15/10/2024



A desktop inspection via ORC's natural hazards portal; shows no alluvial fan hazards, or flooding hazards.

It does show a somewhat close faultline of Possible certainty; the Blackmans 2 Fault, part of the Galloway fault zone, about 900m away. Although the mapping of this faultline is inaccurate and thus may be closer to the subdivision than the mapping suggests, I consider that further investigation is unnecessary. The largest seismic risk to the development is still likely to be from the main Alpine Fault.

Yours sincerely

Dominic Haanen

A handwritten signature in black ink, appearing to read "D Haanen", is written over the printed name.

Environmental Engineer

And Dan Kirkman

RECEIVED
03/06/2025
CODC

01



SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Jasmine Stewart

Contact person (if applicable):

Electronic address for service of submitter: jasmine.stewart@xtra.co.nz

Telephone: 0211050675

Postal address (or alternative method of service under [section 352](#) of the Act):

147 Dunstan Road

RDI

Alexandra.

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

non complying activity pursuant to Rule 4.7.5 (iii)
and all the other items requested as follows
in application document.

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

"Oppose"

This is contrary to provisions of the
district plan. Too many Lots and too many
breaches of restricted and discretionary
activities

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

Decline!!

I/We **support / oppose / neither support or oppose** the application (circle one)

I/We **wish / do not wish** to be heard in support of this submission (circle one)

I/We **am / am not*** a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We **am / am not** (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We **request*** / do not request (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

Jasmine Stewart
 Signature of submitter
 (or person authorised to sign on behalf of submitter)

01/06/25
 Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).
2. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.
3. You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
4. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.
5. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically, these costs range from \$3,000 - \$10,000.
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 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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02



SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

(Form 13)

03 440 0056

Section 95A Resource Management Act 1991

Info@codc.govt.nz
www.codc.govt.nz

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Sandra Gaul DONNELLY

Contact person (if applicable):

Electronic address for service of submitter: matakdonnelly@live.com

Telephone: 027 655 3091

Postal address (or alternative method of service under section 352 of the Act):

6 Larch Crescent, Alexandra 9320

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
 (give details, attach on separate page if necessary)

Road Subdivision consent 155 Dunstan Road, Alexandra

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

full support as submitted. Alexandra has a shortage of good quality sections. I do not believe there will be any adverse impact on the roading or infrastructure as a result.

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

Full support as submitted to the road subdivision consent for 155 Dunstan Road, Alexandra.

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We ~~am~~ am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We ~~am~~ am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request* / do not request (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**


 Signature of submitter
 (or person authorised to sign on behalf of submitter)

16/6/25
 Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B.
2. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.
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03



**SUBMISSION ON NOTIFIED APPLICATION
CONCERNING RESOURCE CONSENT**

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz

(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Mich Davison

Contact person (if applicable):
as above

Electronic address for service of submitter: Mich.davison3@gmail.com

Telephone: 0211257340

Postal address (or alternative method of service under section 352 of the Act):

2004 Inggate Cornwall Way
R.D.3 Cornwall

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

Council trying to reduce the amount of setbacks on this subdivision when a council subdivision across the road is completely different. This is inconsistent!

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We support / oppose / ~~neither support or oppose~~ the application (circle one)

I/We wish do not wish to be heard in support of this submission (circle one)

I/We ~~am~~ / am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We ~~am~~ / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

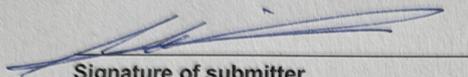
*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request / ~~do not request~~ (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**



Signature of submitter

(or person authorised to sign on behalf of submitter)

16-6-25

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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04



SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

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Info@codc.govt.nz
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(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: William John Anderson

Contact person (if applicable):

Electronic address for service of submitter: willanderson@hotmail.co.nz

Telephone: 0210 814 2010

Postal address (or alternative method of service under *section 352* of the Act):
4 Kowhai Drive

Wanaka 9305

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:

(give details, attach on separate page if necessary)

the consent request to undertake a 30 lot residential subdivision at 155 Dunstan Road, Alexandra

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

I support the proposal, because:

- 1,500 m2 lots are unnecessarily large in this location which is close to town

Having been rezoned, this area can be considered as within the township

The proposed subdivision is close to amenities (schools, golf course, cafes etc)

the proposal is broadly inline with CODC recent plan change 19 and only slightly more intensive

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

That the consent be granted as applied for

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) ~~does not relate to trade competition or the effects of trade competition.~~

***Delete this paragraph if you are not a trade competitor.**

~~I/We will consider presenting a joint case if others make a similar submission.~~

***Delete this paragraph if not applicable.**



I/We **request*** **do not request** (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

A handwritten signature in blue ink, appearing to be 'M. M. M.', written over a horizontal line.

Signature of submitter
(or person authorised to sign on behalf of submitter)

A handwritten date '16/06/2025' in blue ink, written over a horizontal line.

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
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New Zealand

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www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Andrew Hawkeswood, Director of Jacks Ridge Ltd and Hawkeswood Mining Ltd

Contact person (if applicable):

Andrew Hawkeswood

Electronic address for service of submitter: andrew@hawkeswood.co.nz

Telephone: 021 784 675

Postal address (or alternative method of service under [section 352](#) of the Act):

119 Dunstan Road

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
 (give details, attach on separate page if necessary)

All

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

I support the moderately higher residential density sought by Glen Oir in its subdivision consent application.

We operate a workshop and storage yard in the commercial/industrial precinct at 119 Dunstan Rd. As

Council have committed to rezone Dunstan Rd to residential, it makes no difference to us whether the lots

along at 155, which is ~300m along the road from us, are of a 1500m² average (current rules) or slightly

smaller. The rezoning will increase traffic, but Glenoir's proposal is not of a scale that makes any difference.

Any potential noise sensitivity issues already exist as a result of the houses across the road.

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

We propose Council approve Glen Oir's consent application

I/We **support** / ~~oppose~~ / ~~neither support or oppose~~ the application (circle one)

I/We ~~wish~~ / **do not wish** to be heard in support of this submission (circle one)

I/We ~~am~~ / **am not*** a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

~~I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that~~

- ~~(a) adversely affects the environment; and~~
- ~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

~~*I/We will consider presenting a joint case if others make a similar submission.~~

~~*Delete this paragraph if not applicable.~~

R



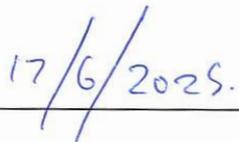
I/~~We request~~ **do not request** (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**



Signature of submitter

(or person authorised to sign on behalf of submitter)



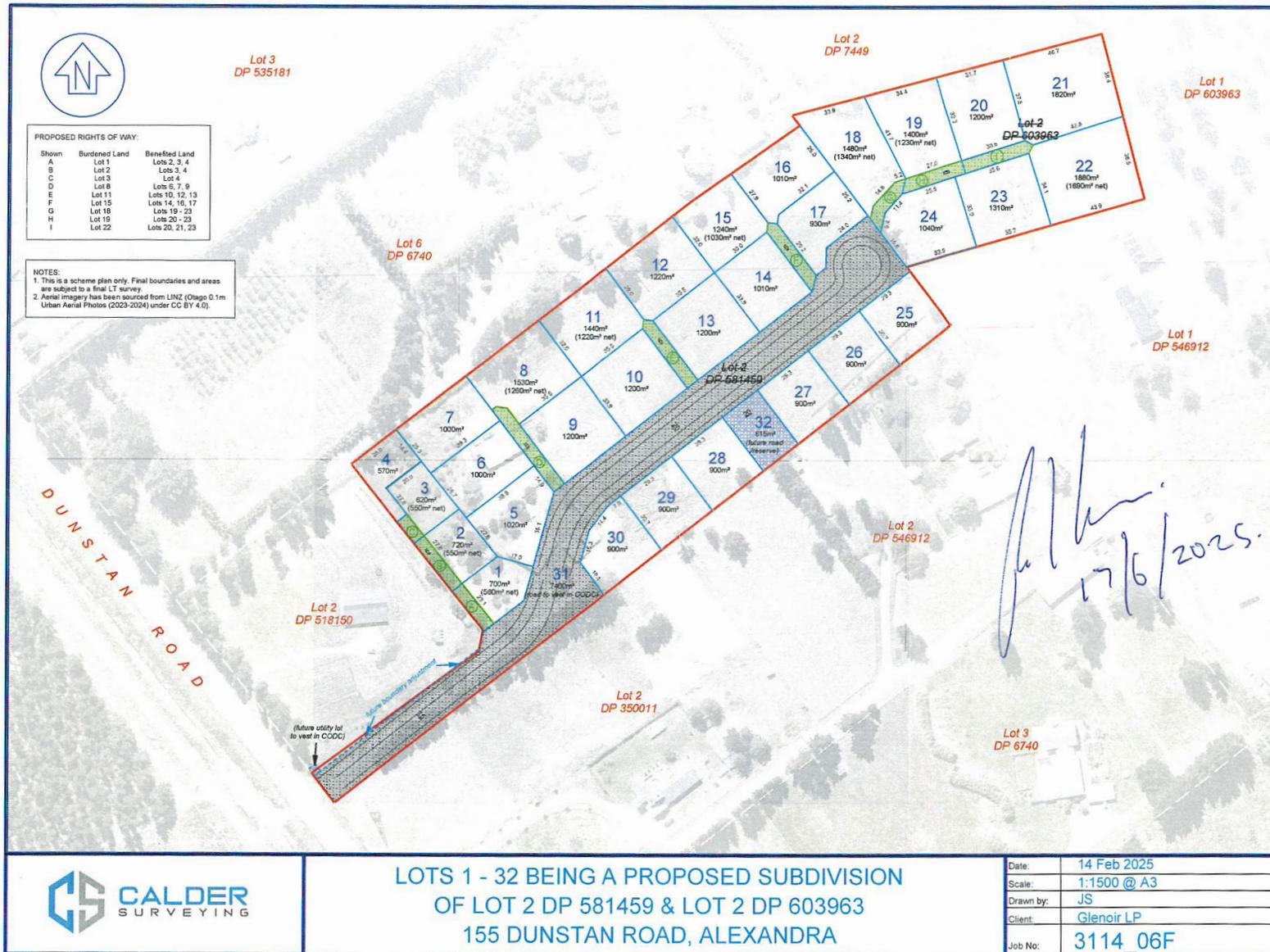
Date

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Notes to submitter

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Handwritten signature and date: 17/6/2025.

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

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Info@codc.govt.nz
www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Paddy Kilbride

Contact person (if applicable):

Electronic address for service of submitter: paddy.kilbride@gjgardner.co.nz

Telephone: 021331171

Postal address (or alternative method of service under *section 352* of the Act):
33 Reece Crescent, Wanaka, 9305

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

Ideal lot sizes for the Alexanra market

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

To support the subdivison into smaller lots

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We **support** / oppose / neither support or oppose the application (circle one)

I/We **wish** / **do not wish** to be heard in support of this submission (circle one)

I/We **am** / **am not** a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We **am** / **am not** (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

~~I/We will consider presenting a joint case if others make a similar submission.~~

***Delete this paragraph if not applicable.**



~~I/We request* / do not request (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.~~

***See note 4 below as you may incur costs relating to this request.**

P J Kilbride

17/06/2025

Signature of submitter

Date

(or person authorised to sign on behalf of submitter)

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
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New Zealand

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(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Andrew Little

Contact person (if applicable):
Anden

Electronic address for service of submitter: andrew.little@harcourts.co.nz

Telephone: 027 2294007

Postal address (or alternative method of service under [section 352](#) of the Act):

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

- ✓ The location of this subdivision is close to town and access to schools, sports fields etc.
- ✗ It's an interesting mix of m² and not postage stamp mentality.

This submission is: (attach on separate page if necessary)

Include:

- whether you support ~~or oppose~~ the specific parts of the application or wish to have them amended; and
- the reasons for your views.

- ✗ Need to future proof development and a blanket 1500m² so close to town boundary will be regretted in years to come. a) depend will increase for sections.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We support / ~~oppose~~ / neither support or oppose the application (circle one)

I/We ~~wish~~ / do not wish to be heard in support of this submission (circle one)

I/We ~~am~~ / am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We am / ~~am not~~ (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request* / do not request (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

[Handwritten Signature]
Signature of submitter
 (or person authorised to sign on behalf of submitter)

June 19th 2025
Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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08

Submission on Notified
Resource Consent
PL250649655



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz



Submission on Notified Resource Consent

Reference	PL250649655	Submitted	19 Jun 2025 02:02
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Notified Submission

SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A (public) Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

This is a submission on the following resource consent application:

Resource Consent Number	250095
Valuation Number	2853159704
Applicant	Glenoir LP
Location of Site	155 Dunstan Road, Alexandra
Brief Description of Application	Subdivision and land use consent to create 30 lots for residential activity
Submissions Close	4.00pm on Monday 23 June 2025

Writing a submission

Page 1 of 4

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The following will be required during this process:

- Your full name and address, telephone number and email address
- Whether you support or oppose the application for resource consent
- The reason for your submission
- The decision you wish the Council to make, including any conditions sought
- Whether you wish to be heard.

Important information so you don't lose your data

If you wish to take some time completing this form, we strongly recommend that you **create a [login](#) and log in to your account prior to starting to complete the form**. This gives you the ability to save a draft and return to it later.

If you are a club or organisation, please use an email that is associated with the club rather than your work or personal email.

Logging in before starting to enter information into the form also means you won't lose your information if the form times out, or if you accidentally navigate away from the screen you're working on.

You cannot save your information and return to it later unless you log in before you start the form.

Regardless whether you are logged in, once you have completed and submitted the form, you will receive a copy of your submission to the email address you specify in the form.

Either go to our [Online Services](#) page to create an account (or log in if you already have an account) or continue below to start without logging in.

Privacy

The information you provide is official information and is used to help process your application. The information is held and used in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 2020. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. Under the Privacy Act 2020 you have the right to see and correct any personal information that Council may hold about you.

Declaration

By continuing with this application you certify that: The Yes information you provide is true and correct to the best of your knowledge.

Notified Submission

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on

Page 2 of 4

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4. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically these costs range from \$3,000 - \$10,000.
5. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:

It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

In lodging this submission, your submission, including contact details, become public information and will be available for anyone to view.

DETAILS OF SUBMITTER

Full name	Dougal Laidlaw
Contact person (if applicable)	Dougal Laidlaw
Electronic address for service of submitter:	dougal.laidlaw@bayleys.co.nz
Phone number - day time	021339055
Postal address (or alternative method of service under section 352 of the Act):	24 The Mall Cromwell 9310

Your Application

Please select one regarding the application I support

Do you wish to be heard in support of this submission? No - I do not want to be heard

Are you a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991? I am not

I would consider presenting a joint case if others make a No similar submission

Details of submission

The specific parts of the application that my submission relates to are: Section size

The submission - include: I support this application

Page 3 of 4

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- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

The section size of 1200m2 is very good for public choice. Families would like a bit of room. Having most of the sections over 900m2 and a few down to 500m2 will not really make any difference but once again give a bit more flexibility to the buyers. Family budgets and affordability vary greatly.

Please upload any documents / photos that are relevant

I seek the following decision from the consent authority.

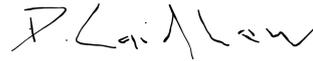
Give precise details, including the general nature of any conditions sought

Select below - Pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. "See note 4 (second tab) as you may incur costs relating to this request." I do not request

Any other comments?

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process. Yes

Please sign (click on the words CAPTURE)



Date signed:

19/06/2025

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23/06/2025
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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Ross & Alison Meldrum

Contact person (if applicable):

Electronic address for service of submitter: r.meldrum@xtra.co.nz

Telephone: 021 2578200

Postal address (or alternative method of service under [section 352](#) of the Act):

PO Box 134

Alexandra 9340

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

- _____
- Non compliant Lot size, Lot density
- _____
- Stormwater discharge
- _____

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

- _____
- Attached - one page
- _____
- _____
- _____
- _____

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

That the Application under it's Comprehensive Residential Development framework be declined.

I/We **support** ~~oppose~~ **neither support or oppose** the application **(circle one)**

I/We **wish** ~~do not wish~~ to be heard in support of this submission **(circle one)**

I/We **am** ~~am not~~ a trade competitor for the purposes of section 308B of the Resource Management Act 1991 **(circle one)**

~~*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:~~

- ~~(a) adversely affects the environment; and~~
- ~~(b) does not relate to trade competition or the effects of trade competition.~~

***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request* **do not request** (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

[Handwritten signature]

22 June 2025

Signature of submitter

Date

(or person authorised to sign on behalf of submitter)

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on Resource Consent Application RC No: 250095

Submission of: Alison and Ross Meldrum* - affected party.

- *Director Berryactives Ltd

This submission opposes the application on two counts:

Disproportionate loss of neighbour's present and future amenity values.

Health & safety concerns subsequent to stormwater discharge.

1. Disproportionate loss of neighbour's present and future amenity values

- (i) The north-western boundary to 165 Dunstan Rd proposes 7 lots directly abutting and 2m distant from an existing domestic/commercial driveway. Indicated lot size precludes "generous setback" of residences which will inevitably dominate the adjoining site along this 250m boundary (LLRZ-P1(3)). Driveway safety becomes a concern as do issues of reverse sensitivity associated with vehicle movement and business activity. The likelihood that this driveway becomes de facto pedestrian access to these properties compounds these concerns.
- (ii) To establish integration, outlook, and amenity value on its 250m north-west aspect, the proposed development is dependent on the existing and future characteristics of the adjacent property (165 Dunstan Rd).

Conversely the outlook and amenity value of future LLRZ development ("detached houses on large sites maintaining a high open space to built form ratio") at 165 Dunstan Rd is compromised by the non compliant built form density proposed on this boundary (LLRZ-P9 (3)).

2. Health & safety concerns subsequent to stormwater discharge

- (i) The application does not address the environmental monitoring or mitigation of possible aquifer contamination through stormwater discharge.
- (ii) The development proposal would discharge all stormwater (domestic drains and roadside swales) direct to ground. This implies 30+ additional stormwater discharge points within 150m of a water abstraction bore at 165 Dunstan Road (and other adjacent bores noted in the applicant's IE Environmental Site Investigation). In free draining alluvial gravel the risk of aquifer and hence abstracted water contamination rises proportionally. This is of particular concern to Berryactives Ltd – site registration no COD000337/1 operating under the Food Act (NP2) at 165 Dunstan Road.

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

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PO Box 122, Alexandra 9340
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(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: JOINT SUBMITTERS - AFFECTED PARTIES (see attached)

Contact person (if applicable): ROSS MELDRUM

Electronic address for service of submitter: r.meldrum@xtra.co.nz

Telephone: 021 2578200

Postal address (or alternative method of service under [section 352](#) of the Act):

PO Box 134

ALEXANDRA 9340

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

- SUITABILITY AND APPLICATION OF COMPREHENSIVE RESIDENTIAL DEVELOPMENT RULE
- MANAGEMENT OF STORMWATER DISCHARGE

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

ATTACHED - ONE PAGE

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

WE SEEK DISMISSAL OF THE APPLICATION

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

~~*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:~~

- ~~(a) adversely affects the environment; and~~
- ~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

~~*I/We will consider presenting a joint case if others make a similar submission.~~

~~*Delete this paragraph if not applicable.~~



I/We **request*** / **do not request (circle one)**, pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

A handwritten signature in black ink, appearing to read 'D. R. Miller', followed by a horizontal line.

Signature of submitter

(or person authorised to sign on behalf of submitter)

22 June 2025

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

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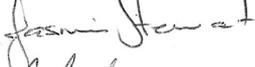
Joint Submission

Resource Consent Application RC No: 250095

In opposing the application this submission contends that the proposal fails to meet the rules or satisfy the objectives of the Comprehensive Residential Development pathway which it invokes. Moreover this submission contends that the CRD pathway is inappropriate to the site:

1. In establishing the LLRZ (the lowest density of all the residential zones) Council clearly indicates its intention to limit the density of residential development on the eastern aspect of Dunstan Road. The application is at odds with this intention.
2. The site, although greater than 2ha, is not a "larger site" in the context of the intended transitional function of the LLRZ between urban and rural land use as articulated in the Vincent Spatial Plan – which as the applicant notes has informed PC19. (LLRZ-P9)
3. Lot density exceeds that permitted in CRD rule LLRZ-R12.
4. The proposal offers no wider public benefits (reserves, public access, infrastructure improvements. (LLRZ-P9)
5. Notwithstanding a potential roading connection to the South East the rectilinear site offers no natural or planned connectivity with the surrounding area (LLRZ-02(4)).
6. The application does not address potential groundwater contamination resulting from ground discharge of stormwater from 30 residential drains and roadside swales.
7. This submission fully acknowledges that the site be seen in the context of the LLRZ framework however the non-conforming CRD lot size and concomitant intensity of built form will materially and unreasonably dominate adjoining sites proportionally more than a compliant LLRZ proposal (LLRZ-P1(3)).

This submission urges the Council to adhere to the policies, rules and objectives of Plan Change 19 (Appendix 5) in dismissing this application. This dismissal should be made both on the regulatory shortcomings of the application and to mitigate risk of precedent in which Comprehensive Residential Development provisions are further utilised solely to legitimise higher density development.

Greg & Shirley Davis	149b Dunstan Rd	
Paul & Angela Jacobson	36 Hillview Rd	
Jasmine Stewart	147 Dunstan Rd	
Ross & Alison Meldrum	165 Dunstan Rd	

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Submission on Notified
Resource Consent
PL250652790



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PO Box 122, Alexandra 9340
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www.codc.govt.nz



Submission on Notified Resource Consent

Reference PL250652790 Submitted 21 Jun 2025 10:48

Notified Submission

SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A (public) Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

This is a submission on the following resource consent application:

Resource Consent Number	250095
Valuation Number	2853159704
Applicant	Glenoir LP
Location of Site	155 Dunstan Road, Alexandra
Brief Description of Application	Subdivision and land use consent to create 30 lots for residential activity
Submissions Close	4.00pm on Monday 23 June 2025

Writing a submission

Page 1 of 4

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- The decision you wish the Council to make, including any conditions sought
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Notified Submission

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Page 2 of 4

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 - o it is frivolous or vexatious:
 - o it discloses no reasonable or relevant case:
 - o it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - o it contains offensive language:

It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

In lodging this submission, your submission, including contact details, become public information and will be available for anyone to view.

DETAILS OF SUBMITTER

Full name	Barry Thomas Mackie
Contact person (if applicable)	Barry Thomas Mackie
Electronic address for service of submitter:	mackiegc@xtra.co.nz
Phone number - day time	0211740492
Postal address (or alternative method of service under section 352 of the Act):	251 Letts Gully Road Alexandra

Your Application

Please select one regarding the application	I oppose
Do you wish to be heard in support of this submission?	No - I do not want to be heard
Are you a trade competitor for the purposes of section 308B of the Resource Management Act 1991?	I am not
I would consider presenting a joint case if others make a No similar submission	No

Details of submission

The specific parts of the application that my submission relates to are:	A non compliant activity A discretionary activity pursuant to rule 4.7.4[iii]
The submission - include:	I cannot believe the applicant has the temerity to ask for

Page 3 of 4

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- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

consent to set up a development of high intensity in an area which the Council has designated low intensity. A high intensity development in this Rural Residential location, outside the town boundary is ridiculous, and would look so out of place. If the applicant is successful this would set a precedent, allowing greedy developers to set up high intensity developments willy nilly and make the long term Councils Residential development plan a farce. This Application has to be declined, in a very emphatic way

Please upload any documents / photos that are relevant

I seek the following decision from the consent authority.

Give precise details, including the general nature of any conditions sought I demand that the authority decline this application

Select below - Pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. "See note 4 (second tab) as you may incur costs relating to this request." I do not request

Any other comments?

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process. Yes

Please sign (click on the words CAPTURE)



Date signed:

21/06/2025

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12



SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand



03 440 0056



(Form 13)

Section 95A Resource Management Act 1991

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To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Gregory Mark Davis & Shirley Brenda Davis

Contact person (if applicable):
Greg Davis

Electronic address for service of submitter: davisautoc@comcast.net

Telephone: 021 334104

Postal address (or alternative method of service under section 352 of the Act):
149B Dunstan rd
Alexandra

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glencor LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

Stormwater discharge
section size
Earthworks rev 2.6

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

attached
see attached pages

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

that the hearing authority decline
the application

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

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- (b) does not relate to trade competition or the effects of trade competition.

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*I/We will consider presenting a joint case if others make a similar submission.

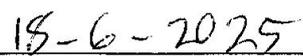
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I/We **request*** / **do not request (circle one)**, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**





Signature of submitter **Date**
 (or person authorised to sign on behalf of submitter)

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 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



Application RC No: 250095 - 155 Dunstan Road, Alexandra. Resource Consent

From Greg Davis <davisautocrom@gmail.com>

Date Mon 23/06/2025 10:31

To Resource Consents <Resource.Consents@codc.govt.nz>; craig@waveformplanning.co.nz
<craig@waveformplanning.co.nz>

1 attachment (1 MB)

Scan19062025-2.pdf;

Shirley & Greg Davis

149B Dunstan Road, Alexandra

We oppose the Application for the following reasons,

1 - Discharge of Stormwater

Our water bore is out on the land at 149 Dunstan Road and is 100 metres from the proposed subdivision. The proposal wants to discharge all stormwater off the 30 sections and roadways into the free draining alluvial gravel risking the contamination of our water bore. There is no mention of this being monitored in the proposal.

2 - Section Size

Plan change 19 has approved sections to be at least 1500 sq metres. These sections are going to be in the low 1300 sq metre size. This does not comply with the terms of this new plan change 19.

3 - 2.6 Earthworks

This states that the site is predominantly flat with a gentle uphill slope at the rear (North Eastern) end of the site. This gentle uphill is a gradient of 1 in 5 metre rise and is all sand with no sound base to build on. Sites 20 to 23 will require removing thousands of metres of sand to build platforms to put houses on. Each section will require retaining walls to stop sand movement. I have just built a 192 sqm shed beside these sections and that alone I needed to move 1800 cubic metres of sand and retaining wall had to be built, I feel these sections are uneconomic to be built on and are only included so to increase the average sqm of the overhaul section size, as these are the largest sections.

Shirley & Greg Davis

149B Dunstan Road,

Alexandra

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13



SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand
03 440 0056



(Form 13)

Section 95A Resource Management Act 1991

Info@codc.govt.nz
www.codc.govt.nz

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: JAN MANSON

Contact person (if applicable):
AS ABOVE.

Electronic address for service of submitter: janmanson@gmail.com

Telephone: 0272429947

Postal address (or alternative method of service under section 352 of the Act):
363 RACECOURSE ROAD
RD.
OHAKA 9376.

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

As attached

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

AS ATTACHED.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

AS ATTACHED.

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

~~*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:~~

- ~~(a) adversely affects the environment; and~~
- ~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

~~*I/We will consider presenting a joint case if others make a similar submission.~~

~~*Delete this paragraph if not applicable.~~



I/**we request*** do not request (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**See note 4 below as you may incur costs relating to this request.*

A handwritten signature in black ink, appearing to be 'J. [unclear]', written over a horizontal line.

Signature of submitter

(or person authorised to sign on behalf of submitter)

Date

20/06/2025

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

This is a submission on the following resource consent application:

RC No: 250095

Applicant:

Glenoir LP Valuation No: 2853159704

Location of site:

155 Dunstan Road, Alexandra

Brief description of application:

Subdivision and land use consent to create 30 lots for residential activity

Submissions close: 4.00pm on Monday 23 June 2025

Further Information with my submission form;**The specific part of the application that my submission relates to is;****CODC zoning the area under application at 1,500m2****This submission is;****In support of a 30 lot subdivision on 155 Dunstan Road because;**

It is within walking distance to schools/Sports fields/ Swimming pool and other sports amenities and that it is appropriate to have smaller lots closer to town

This area should be considered to be part of the Alexandra township going forward, because straight across the road the council land will be considered part of the Alexandra township. It is good to have a diversity of lot sizes. Smaller lots allow for lower cost housing.

The council themselves have zoned their own land directly across Dunstan Road at 200m2 and it is no closer to any of the amenities than this land.

It is inconsistent for Council to insist on such large lots on the other side of Dunstan Road when the walking distance to schools and recreational amenities is the same as the Council zoned 200m2.

1,500 m2 lots this close to town is unnecessarily large and represents poor and inefficient urban planning.

I seek the following decision from the consent authority;

Independent hearing commissioners consider the application.



20/06/2025

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14



SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz

(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: James William Pyle & Nikita Lea Pyle

Contact person (if applicable):

Electronic address for service of submitter: precisionworks@icloud.com

Telephone: 0274479822

Postal address (or alternative method of service under section 352 of the Act):

1802 IDA VALLEY ONAKAU RD, RD2, OTUREHUA

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request* / **do not request** (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

J. B. C. Naylor
 Signature of submitter
 (or person authorised to sign on behalf of submitter)

20.5.25
 Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B.
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 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

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(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Holly Patricia Saunders

Contact person (if applicable):

Electronic address for service of submitter: saundershairdressing@gmail.com

Telephone: 0276714199

Postal address (or alternative method of service under [section 352](#) of the Act):

138 Taylor Place, Alexandra

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:

(give details, attach on separate page if necessary)

It is inconsistent planning for council to insist on such large lots directly opposite their own zoning of 200m²

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

• this area should be part of the Alexandra township moving forward, particularly because the council zoned laned across the road is at 200m². However, the speed limit should be brought down to 50 km per hour
• efficiency of urban planning • close to schools + sports recreation

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

- support 30 lot subdivision
- support a speed limit of 50 km/ph

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

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~~*Delete this paragraph if you are not a trade competitor.~~

~~*I/We will consider presenting a joint case if others make a similar submission.~~

~~*Delete this paragraph if not applicable.~~



I/We request* **do not request** (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**



Signature of submitter

(or person authorised to sign on behalf of submitter)



Date

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

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www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: John Gerard Waldron

Contact person (if applicable):

Electronic address for service of submitter: ithiel@extra.co.nz

Telephone: 027 2272371

Postal address (or alternative method of service under [section 352](#) of the Act):
426 A Manuherikia Road
Springvale
Alexandra 9393

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:

(give details, attach on separate page if necessary)

- Proximity to schools and recreational facilities same as across ^{the} road.
- 1,500 m² lots this close to town is unnecessarily large and represents poor and inefficient urban planning.

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

1. The town Boundary should be extended to the edge of the gdf course on both sides of Dunstan Road.
2. It is inconsistent for the Council to Insist on such large lots on ~~either~~ ^{this} side of Dunstan Road when the walking distance to schools and recreational amenities is the same as Council zoned 200m².

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

I support this sub division at the lower lot size than plan change 19

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request* **do not request** (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**



Signature of submitter
 (or person authorised to sign on behalf of submitter)

20-6-2025

Date

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
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Info@codc.govt.nz
www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Caroline Tamblyn

Contact person (if applicable):

Electronic address for service of submitter: caroline-tamblyn@gmail.com

Telephone: 0274 802075

Postal address (or alternative method of service under section 352 of the Act):
3300 Fruitlands - Roxburgh Road
RD 1, Roxburgh
Central Otago 9571

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:
 (give details, attach on separate page if necessary)

 separate page attached

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

 I support Glenair LP with their application
 separate page attached

I/We seek the following decision from the consent authority:
 (give precise details, including the general nature of any conditions sought)

 Approve the land use consent sought by
 Glenair LP for a 30 lot subdivision
 at 155 Dunstan Road

I/We **support** / oppose / neither support or oppose the application (circle one)

I/We **wish** / **do not wish** to be heard in support of this submission (circle one)

I/We **am** / **am not** a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We **am** / **am not** (circle one) directly affected by an effect of the subject matter of the submission that:

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***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We **request* / do not request (circle one)**, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

A handwritten signature in blue ink, appearing to be 'D. [unclear]'.

Signature of submitter

(or person authorised to sign on behalf of submitter)

Date

18/6/25

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

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 - it contains offensive language:
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Caroline Tamblyn's submission continued.....

I support Glenoir LP in their resource consent application 250095 for a 30 lot subdivision at 155 Dunstan Road.

It doesn't make sense for planning rules to limit the number of smaller residential new build sections. Buyers should have a choice of options of section sizes, this includes smaller sections.

I note that a range of section sizes, right down to 200 m² are available for purchase on a nearby subdivision project on Dunstan Road. The reason for greater flexibility for that subdivision development appears to be that CODC itself is the developer. Is this correct? Are the rules being applied inconsistently in favour of CODC.

Regarding smaller sections, higher density housing options in Alexandra makes sense for many obvious reasons:

- Many people, especially Seniors do not want a large lawn or garden to mow or care for. They are seeking smaller houses and sections.
- Higher density helps to prevent urban sprawl with shorter distances to amenities in the centre of town
- A greater number of sections give better economies of land space and costs for expensive infrastructure like water, sewage and power.
- The population of Alexandra is predicted to increase substantially, this requires CODC to plan ahead now and provide more housing density and section size options now.

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

(Form 13)

03 440 0056

Section 95A Resource Management Act 1991

Info@codc.govt.nz
www.codc.govt.nz

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Graeme Bell

Contact person (if applicable):

Electronic address for service of submitter: graemerbells@gmail.com

Telephone: 0276502900

Postal address (or alternative method of service under [section 352](#) of the Act):
 42 Briangans Street
 Alexandra 9320

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are
(give details, attach on separate page if necessary)

- The town boundary should be extended on ^{both sides of} Dawson Road - to the edge of the golf course, not just on the southern side of Dawson Road
- It is a waste of utilisable land to be zoned at 1500m² & this close to town when smaller lots sizes are more desirable & affordable to potential purchasers

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

I support it because the town requires further expansion and this is close to your significant amenities of schools, recreational facilities and is within walking distance of schools on the rail trail. It is completely appropriate to have this subdivision proceed where there is land zoned across the road at 200m². In fact this land would be appropriately zoned at 1,000m².

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

- The consent is supported.
- The edge of town is moved to both sides of Dawson road opposite the council owned land adjoining the golf course.

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- adversely affects the environment; and
- does not relate to trade competition or the effects of trade competition.

*Delete this paragraph if you are not a trade competitor.

*I/We will consider presenting a joint case if others make a similar submission.

*Delete this paragraph if not applicable.



I/We request* I do not request (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**See note 4 below as you may incur costs relating to this request.*

A handwritten signature in blue ink, appearing to read 'M. Bell', written over a horizontal line.

Signature of submitter

(or person authorised to sign on behalf of submitter)

20-06-2025

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).
2. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.
3. You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
4. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.
5. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically, these costs range from \$3,000 - \$10,000.
6. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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PO Box 122, Alexandra 9340
New Zealand

03 440 0056

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www.codc.govt.nz

SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Matthew Hore

Contact person (if applicable):

Electronic address for service of submitter: matt.hore19@gmail.com

Telephone: 022 6525 909

Postal address (or alternative method of service under section 352 of the Act):
27 de Bettencor Place
RD 3
Cromwell

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

As per information provided.

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

Support the application.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

Approve as submitted

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request* (do not request (circle one)), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

*See note 4 below as you may incur costs relating to this request.


 Signature of submitter
 (or person authorised to sign on behalf of submitter)

21/6/25
 Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).
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 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

I support Glenoir LP in their resource consent application 250095 for a 30 lot subdivision at 155 Dunstan Road.

The subdivision is within walking distance to schools , swimming pool and other sports amenities. It makes sense to keep lot sizes smaller when it is within walking distance of the town.

This area should be considered part of the Alexandra township going forward. Straight across the road Council owned land is to be included in the Alexandra township .

It is good to have different lot sizes with smaller lots being able to be sold at a more affordable price.

The Council themselves have zoned their own land directly across Dunstan Road to lot sizes of 200m². This land is no closer to any of the amenities than the subdivision at 155 Dunstan Road.

It is inconsistent for Council to insist of such large lots on the other side of Dunstan Road when the walking distance to schools and amenities is the same as the Council owned land which is zoned at 200m².

Lot sizes of 1500m² is unnecessarily large and represents poor and inefficient urban planning

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
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Info@codc.govt.nz
www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Clifford Hiscock.

Contact person (if applicable):
as above.

Electronic address for service of submitter: cliffordthepiper@gmail.com.

Telephone: 0274338657

Postal address (or alternative method of service under section 352 of the Act):
28A Larch Crescent
Alexandra 9340

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:

(give details, attach on separate page if necessary)

* Their application has got a diversity of lot sizes that will cater for a range of buyers.

* This land should be considered part of the Alexandra township moving forward on the same basis as the council zoned land across Dunstan Zone.

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

* It is within walking distance of the major recreational & school facilities of Alexandra.

* It is very reasonable to have smaller lot sizes close to Alexandra and is the same distance to the above facilities, as the Council Zoned Land across the road which is we understand zoned as zone 2

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

That a 30 lot subdivision be granted. This is 3 extra lots above the current proposed council zoning.

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

*Delete this paragraph if you are not a trade competitor.

*I/We will consider presenting a joint case if others make a similar submission.

*Delete this paragraph if not applicable.



I/We request* **do not request** (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**See note 4 below as you may incur costs relating to this request.*



Signature of submitter

(or person authorised to sign on behalf of submitter)

17th June 2025

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B.
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 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
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(Form 13)

03 440 0056

Section 95A Resource Management Act 1991

Info@codc.govt.nz
www.codc.govt.nz

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Richard Naish Tamblyn

Contact person (if applicable):

Electronic address for service of submitter: rintamblyn@gmail.com

Telephone: 0274 802072

Postal address (or alternative method of service under section 352 of the Act):

3300 Fruitlands - Roxburgh Road
Rox
Roxburgh 9571

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

Separate page attached.

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

I support Glenoir LP with their application.
Separate page attached.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I would like Council to approve the land use consent sought by Glenoir LP for a 30 lot subdivision at 155 Dunstan Road.

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

*Delete this paragraph if you are not a trade competitor.

*I/We will consider presenting a joint case if others make a similar submission.

*Delete this paragraph if not applicable.



I/We request* / do not request (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

A handwritten signature in blue ink, appearing to read "Adam Murray".

Signature of submitter

(or person authorised to sign on behalf of submitter)

18th June 2025.

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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I support Glenoir LP in their resource consent application 250095 for a 30 lot subdivision at 155 Dunstan Road.

The subdivision is within walking distance to schools , swimming pool and other sports amenities. It makes sense to keep lot sizes smaller when it is within walking distance of the town.

This area should be considered part of the Alexandra township going forward. Straight across the road Council owned land is to be included in the Alexandra township .

It is good to have different lot sizes with smaller lots being able to be sold at a more affordable price.

The Council themselves have zoned their own land directly across Dunstan Road to lot sizes of 200m². This land is no closer to any of the amenities than the subdivision at 155 Dunstan Road.

It is inconsistent for Council to insist of such large lots on the other side of Dunstan Road when the walking distance to schools and amenities is the same as the Council owned land which is zoned at 200m².

Lot sizes of 1500m² is unnecessarily large and represents poor and inefficient urban planning



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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

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(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Shane Fulton

Contact person (if applicable):

Electronic address for service of submitter: shane@benchmarkconstruction.co.nz

Telephone: 021 196 2755

Postal address (or alternative method of service under [section 352](#) of the Act):
21 Old Bridge Road, Alexandra

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We **support** / oppose / neither support or oppose the application **(circle one)**

I/We wish / **do not wish** to be heard in support of this submission **(circle one)**

I/We am / **am not*** a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 **(circle one)**

~~I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:~~

~~(a) adversely affects the environment; and~~

~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

~~*I/We will consider presenting a joint case if others make a similar submission.~~

~~*Delete this paragraph if not applicable.~~



I/We request* / **do not request** (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

A handwritten signature in black ink, appearing to be "JA", written over a horizontal line.

Signature of submitter

(or person authorised to sign on behalf of submitter)

23-6-25

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

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PO Box 122, Alexandra 9340
New Zealand

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(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: David George Wilson

Contact person (if applicable):

David

Electronic address for service of submitter: KKimberley143@gmail.com

Telephone: 0272285347

Postal address (or alternative method of service under section 352 of the Act):

IASI 25 Steadman Rd

Broomfield

Christchurch 8042

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

size of lots at 1500m². A variety of lot sizes is beneficial to not only the council but also the general public.

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We **support** / oppose / neither support or oppose the application (circle one)

I/We **wish** / do not wish to be heard in support of this submission (circle one)

I/We **am** / am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We **am** / am not (circle one) directly affected by an effect of the subject matter of the submission that:

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~~***Delete this paragraph if not applicable.**~~



I/We request* do not request (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1, or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

[Handwritten Signature]

Signature of submitter

(or person authorised to sign on behalf of submitter)

22/6/25

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

subdivision I have previously been involved with.

I have been involved as a director of a 389 residential and a 20Ha Commercial subdivision. Plus several smaller subdivisions. In the large subdivision all sections had to be 750m².

On the outskirts of this subdivision, were several 2Ha and several 1500m² Lots. At the time many prospective buyers complained that 750m² was too much to look after. Since then the council has seen sense and a recent 272

section development range from 450m² to 650m².

Most of the 2Ha and 1500m² blocks have been subdivided into 2/3 blocks.

Council Subdivision Alexandra

It is unbelievable that the local council has a subdivision, over the road, with section sizes at 200m². Everyone will need to build a 2 story unit to achieve a 3 bedroom house. I can

see this subdivision being a disaster, where is the extra ^{parking} parking for visitors, Cars, boats and where could families put a tramoline up for there children

159 Dunstan Road Subdivision.

The 155 Dunstan Rd subdivision request with sections between 500m² (what many people prefer) up to 1800m²

This subdivision like the council one is close to Schools, sports fields and the town, and the Alexandra community.

Totally 1500m² lots limit potential buyers due to cost and cost again to put bigger houses on. extras include Fencing, landscaping, longer driveways and ride on mowers to help keep the block under control.

The waste water problem is clearly caused by the council with about 350 x 200m² puts huge pressure on the infrastructure, this could take some time as 350 ^{sections} 200m² section will take a long time to sell.

People will be forced to buy 2 lots so they can have some outdoor area.

Regards

David Wilson

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

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(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Jolyon Flannery (George)

Contact person (if applicable):

Electronic address for service of submitter: george.flannery@pkf.co.nz

Telephone: 034488060

Postal address (or alternative method of service under [section 352](#) of the Act):

PO Box 271 Alexandra

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity in the rural residential area**

Submissions close: **4.00pm on Friday 6 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

The application to 30 Lots at 155 Dunstan Road, Alexandra.

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

I support this submission because there is a shortage of sections in general in the Aleandra area and the trades people of Alexandra need more houses to build in our area.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

For consent to be given for the land at 155 Dunstan Road to be allowed to be divided into 30 Lots.

I/We **support** /oppose / **neither support or oppose** the application **(circle one)**

I/We **wish** / **do not wish** to be heard in support of this submission **(circle one)**

I/We **am** / **am not*** a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 **(circle one)**

*I/We **am** / **am not** **(circle one)** directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

****Delete this paragraph if you are not a trade competitor.***

*I/We will consider presenting a joint case if others make a similar submission.

****Delete this paragraph if not applicable.***



I/We **request*** / **do not request (circle one)**, pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

A handwritten signature in black ink, appearing to be 'John', is written over a horizontal line.

23 June 2025

Signature of submitter

(or person authorised to  on behalf of submitter)

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).
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5. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically, these costs range from \$3,000 - \$10,000.
6. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

(Form 13)

03 440 0056

Section 95A Resource Management Act 1991

Info@codc.govt.nz
www.codc.govt.nz

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz



DETAILS OF SUBMITTER

Full name: Rhys Toit

Contact person (if applicable):

Electronic address for service of submitter: thefivetaits@outlook.com

Telephone: 021478669

Postal address (or alternative method of service under section 352 of the Act):
16 Earnsclough Rd, Alexandra 9320

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

lot size average from 1500m² -> 1200m²

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

I support the submission to reduce the average lot size @ 155 Dunstan Road.

The proposed 1200m² average lots are ample in size and will provide the opportunity to increase the number of "new builds" in a well located area.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

~~I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:~~

~~(a) adversely affects the environment, and~~

~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

~~*I/We will consider presenting a joint case if others make a similar submission.~~

~~*Delete this paragraph if not applicable.~~



I/We request* / **do not request** (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

A handwritten signature in black ink, appearing to be 'Ave'.

Signature of submitter

(or person authorised to sign on behalf of submitter)

Date

23/6/25

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

CENTRAL DISTRICT COUNCIL

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand



03 440 0056

Info@codc.govt.nz
www.codc.govt.nz

(Form 13)

26

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Peter Silveira & Tracy Blackmore

Contact person (if applicable):

Electronic address for service of submitter: peter@silveira.com.nz

Telephone: 027 380 5671

Postal address (or alternative method of service under section 352 of the Act):

13 Ridgeway Lane
R.O.S
Alexandra 9393

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glencor LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**





The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request **do not request** (circle one), pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**See note 4 below as you may incur costs relating to this request.*



Signature of submitter
(or person authorised to sign on behalf of submitter)



Date

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Notes to submitter

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz

(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name:

Contact person (if applicable):

Electronic address for service of submitter: _____

Telephone:

Postal address (or alternative method of service under [section 352](#) of the Act):

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We **support** / oppose / neither support or oppose the application (circle one)

I/We **wish** / **do not wish** to be heard in support of this submission (circle one)

I/We **am** / **am not*** a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

~~I/We **am** / **am not** (circle one) directly affected by an effect of the subject matter of the submission that:~~

~~(a) adversely affects the environment, and~~

~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

~~*I/We will consider presenting a joint case if others make a similar submission.~~

~~*Delete this paragraph if not applicable.~~



I/We request* / **do not request** (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**



Signature of submitter

(or person authorised to sign on behalf of submitter)

23/06/2025

Date

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Simon Johnston, employee, Jacks Ridge Ltd and Hawkeswood Mining Ltd

Contact person (if applicable):

Electronic address for service of submitter: simon@hawkeswood.co.nz

Telephone: 021 784 675

Postal address (or alternative method of service under [section 352](#) of the Act):
119 Dunstan Road

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

All

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

I support the subdivision consent application by Glen Oir.

What they are proposing will not affect us. The area surrounding us is already residential. There are already houses directly across the road. Its a fact that council's rezoning will have some increase in traffic. but this will happen anyway. Glenoir's proposal appears to be pretty close to what Council has zoned. It makes sense to have some smaller lots at the town end of Dunstan Rd.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I/We **support** / ~~oppose~~ / ~~neither support or oppose~~ the application **(circle one)**

I/We ~~wish~~ / **do not wish** to be heard in support of this submission **(circle one)**

I/We ~~am~~ / **am not*** a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 **(circle one)**

~~*I/We **am** / **am not** (circle one) directly affected by an effect of the subject matter of the submission that:~~

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~~***Delete this paragraph if not applicable.**~~



I/~~We request~~ **do not request (circle one)**, pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

A handwritten signature in black ink, appearing to be 'S. Smith', is written over a horizontal line.

17/6/25

Signature of submitter

Date

(or person authorised to sign on behalf of submitter)

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Notes to submitter

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

info@codc.govt.nz
www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Grant Porter

Contact person (if applicable):

Electronic address for service of submitter: grantporter@xtra.co.nz

Telephone: 021 447 268

Postal address (or alternative method of service under [section 352](#) of the Act):

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

See Attached.

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

Four horizontal lines for providing details.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

Three horizontal lines for providing details.

I/We support / oppose / neither support or oppose the application (circle one)

I/We wish / do not wish to be heard in support of this submission (circle one)

I/We am / am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

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- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

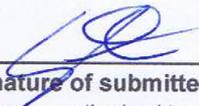
*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**



I/We request* / do not request (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**



Signature of submitter
(or person authorised to sign on behalf of submitter)

23/6/25

Date

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 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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The Chief Executive
Central Otago district Council
P O Box 122
Alexandra 9340

Submission on Notified Application Concerning Resource Consent (RC 250095)

Glenoir LP – 155 Dunstan Road Alexandra.

Name of Submitter: Grant Porter
Address for Service: G Porter
1460 Tarras Cromwell Road
RD3
Cromwell 9383

Information additional to Form 13

Specific Parts of the Application this Submission Relates to:

The submitter **SUPPORTS:**

- The 30 lot subdivision for the number and size of lots as lodged for consent.

Reasons for Supporting application:

The growth of Alexandra and the councils own subdivision with smaller lot sizes on the west side of Dunstan Road set a precedent and should mean that this subdivision is treated similarly and fairly by the council.

Further Dunstan road is already well developed and it would do well to be the logical expansion of Alexandra. It would enhance a number of blocks down this road if they were to be further developed to a higher standard.

Having a number of higher quality smaller developments on the edge of town would not impact the commercial zone which is mainly commercial yards / storage of gear and are not high use commercial properties.

Dunstan Road is already busy and would support a lower speed limit even without this subdivision and mainly due to the large council subdivision meaning the horse had already bolted down this end of town due to traffic numbers.

Decisions Sought from the Consent Authority

I support the application by **Glenoir LP**.

I confirm I am not a trade competitor for purposes of section 308B of the Resource Management Act 1991.

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz



DETAILS OF SUBMITTER

Full name: Blair Fieldes

Contact person (if applicable):

Electronic address for service of submitter: fieldes4@xtra.co.nz

Telephone: 0274458011

Postal address (or alternative method of service under [section 352](#) of the Act):

48 Domain Rd

R D 2

Cromwell

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

Logical and consistent urban intensification that will provide future affordable housing options.

Planning once so infrastructure is installed at the outset for all future requirements instead of ruling large sections then 5-10 yrs later Council get requests for infill requiring increased services at Council cost.

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

Fully support the application;

Logical extension of the fully inbuilt urban area of Alexandra. (It is directly opposite the

Councils own recently consented high density urban area. Decline of this application

must lead to questions being asked about the decision made on Councils subdivision.

Application area is in easy walking distance to schools , sports areas, Swimming pool etc.

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

Approval of the application.

I/We support / ~~oppose~~ / ~~neither support or oppose~~ the application (circle one)

I/We wish / ~~do not wish~~ to be heard in support of this submission (circle one)

I/We am / ~~am not~~* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We am / ~~am not~~ (circle one) directly affected by an effect of the subject matter of the submission that:

- adversely affects the environment; and
- does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

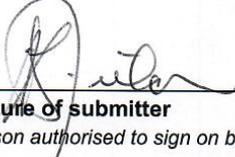
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***Delete this paragraph if not applicable.**

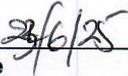


I/We request* / **do not request (circle one)**, pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**



Signature of submitter
 (or person authorised to sign on behalf of submitter)



Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

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 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

Info@codc.govt.nz
www.codc.govt.nz



(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Tane Russell, director at Highlands Scaffold Ltd

Contact person (if applicable):
Tane

Electronic address for service of submitter: office@highlandsscaffolding.co.nz

Telephone: 027 527 7167

Postal address (or alternative method of service under [section 352](#) of the Act):
119 Dunstan Road

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

[Subdivision consent for 30 lots](#)

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

I am involved in the building industry in Alex. I support the subdivision consent application by Glen Oir.

Alexandra needs a range of affordable lots for housing. The 155 Dunstan Rd site is close to town. It makes

sense that it can be developed to a higher density than the lots at the far (north) end of Dunstan Rd.

Glenoir's scheme allows for a range of lot sizes, mostly large lots. This mix is what is needed.

It does not make sense to have small lots on the south side of Dunstan Rd while forcing unnecessarily large

lots on the north side of the road

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

[Approve](#)

I/We **support** / oppose / neither support or oppose the application (circle one)

I/We **wish** / do not wish to be heard in support of this submission (circle one)

I/We **am** / am not a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We **am** / am not (circle one) directly affected by an effect of the subject matter of the submission that:

- (a) ~~adversely affects the environment; and~~
- (b) does not relate to trade competition or the effects of trade competition.

***Delete this paragraph if you are not a trade competitor.**

~~*I/We will consider presenting a joint case if others make a similar submission.~~

***Delete this paragraph if not applicable.**



I/We **request** / **do not request** (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**

[Handwritten signature]

Signature of submitter

(or person authorised to sign on behalf of submitter)

23/10/25

Date

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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Cameron Fin Rutherford

Contact person (if applicable):

Electronic address for service of submitter: cameron@clca.co.nz

Telephone: 0276632086

Postal address (or alternative method of service under section 352 of the Act):
69 Tarbert Street, Alexandra

This is a submission on the following resource consent application: RC No: **250095**

Applicant: **Glenoir LP** Valuation No: **2853159704**

Location of site: **155 Dunstan Road, Alexandra**

Brief description of application: **Subdivision and land use consent to create 30 lots for residential activity**

Submissions close: **4.00pm on Monday 23 June 2025**



The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

please find attached

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

please find attached

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

Approval

I/We support oppose / neither support or oppose the application (circle one)

I/We ~~wish~~ do not wish to be heard in support of this submission (circle one)

I/We am / am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

I/We am / am not (circle one) directly affected by an effect of the subject matter of the submission that:

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A handwritten signature in blue ink, appearing to be "John".

Signature of submitter

(or person authorised to sign on behalf of submitter)

23/6/25

Date

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Reasoning for approval of subdivision at 155 Dunstan Road, Alexandra

- 1) Lot sizes of 1,500m are unnecessarily large in this location, which is within walking distance to schools, sports fields, swimming pools and other sports amenities
- 2) Directly across Dunstan Road appears to be a high-density zoning. It is inconsistent and unjust for Council to insist on such large lots on the other side of Dunstan Road when the walking distance to schools and recreational amenities is largely the same as the Council zoned 200m²
- 3) Areas for growth in housing in Alexandra are limited, with this location in Dunstan Road being close to amenities listed above and the township
- 4) There is no basis to zone the 1.6km strip along Dunstan Rd the same. It's appropriate to have smaller lots close to town and larger lots further out. It is good to have a diversity of lot sizes as smaller lots allow for lower cost housing and options for homeowners
- 5) This will not create any further burden on wastewater or water supply as the council have committed to supply this all along Dunstan Road
- 6) The 50km traffic speed zone should be considered for extension into this area given the likelihood of people walking across the road to access the rail trail to lead to schools and amenities listed above



Cameron Rutherford
23 June 2025