

## Resource Management Act 1991

### Submission on Notified Proposed Plan Change to Central Otago District Plan

*Clause 6 of Schedule 1, Resource Management Act 1991*

#### (FORM 5)

To: The Chief Executive  
Central Otago District Council  
PO Box 122  
Alexandra 9340

### Details of submitter

Name: **Shanon Garden**

Postal address: **1535 Teviot Road, Millers Flat, RD2 Roxburgh 9572**  
*(Or alternative method of service under [section 352](#) of the Act)*

Phone: **021 414 664**

Email: **shanon@navigateproperty.co.nz**

Contact person: **Shanon Garden, Director, One Five Five Developments LP**  
*(Name & designation, if applicable)*

**This is a submission on proposed Plan Change 19 to the Central Otago District Plan (the proposal).**

**I am not a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991**

**The specific provisions of the proposal that my submission relates to are:**

*(Give details, attach on separate page if necessary)*

Relating to the proposed Large Lot Residential (LLR) rezoning on the north side of Dunstan Road, between  
131 and 157 Dunstan Road

**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.

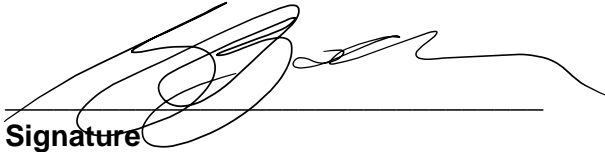
**I / We seek the following decision from the consent authority:**

*(Give precise details, including the general nature of any conditions sought)*

To rezone this area into either Low Density Residential (LRZ), or apply the alternative Large Lot Residential (P1) zoning.

- **I oppose the application *(of the currently proposed zoning)***
- **I wish to be heard in support of this submission**

**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.**

  
Signature

2<sup>nd</sup> September 2022  
Date

## **Submissions close at 4pm on Friday 2 September 2022**

Submissions can be emailed to [districtplan@codc.govt.nz](mailto:districtplan@codc.govt.nz)

**Note to person making submission:**

*If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.*

*Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that a 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.*

## 1. Introduction and Background

My name is Shanon John Garden.

I am a local land developer, with knowledge of the Central Otago property sector.

I grew up in Central Otago. I live and work here. I particularly want to see the bottom half of our District, between Alexandra and the Teviot Valley, continue to grow and prosper.

I am a shareholder in, and I am making this submission on behalf of One Five Five Developments LP.

## 2. Land to which this submission relates

One Five Five Developments has contracted to purchase the 3.1Ha block at 155 Dunstan Road, Parcel ID 7875761, LOT 1 DP 518150 (the *Symons block*).

We have a further contract to acquire ~1.0Ha of the bottom of the neighbouring 129 Gilligan's Gully Road property (Parcel ID 7078812, LOT 3 DP 399742), owned by Pip and Aidan Helm (*the Helm block*), which would be amalgamated into 155 Dunstan Rd by way of boundary adjustment.

We are in ongoing discussions with the owners of 157 Dunstan Road (Parcel ID 7875762, LOT 2 DP 518150), Chis Cameron and Carolyn Patchett, to acquire ~5800m<sup>2</sup> of their property (*the Patchett/Cameron block*) to include it in our development, or possibly to undertake some joint venture with those owners to develop a portion of that block in conjunction with ours.

The arrangements relating to the Helm and Cameron/Patchett blocks are both subject to the outcomes of Plan Change 19.

Together, this would aggregate a parcel of approximately 4.7Ha for development of residential sections.

This submission should be read in conjunction with the submissions of:

- a) Carolyn Patchett and Chris Cameron of 157 Dunstan Road; and
- b) Aidan and Pip Helm of 129 Gilligan's Gully Rd

This aggregated area (referred to herein as the "Subject Land") is shown in Figure 1, below.



**Figure 1: Aggregated property to be developed by One Five Five Developments LP**

### 3. Overlay of Currently Notified Plan Change 19 Rules on the Subject Land

155 and 157 Dunstan Rd (the Symons and Cameron/Patchett blocks) are within the area proposed by the notified plan Change 19 to be re-zoned to Large Lot Residential (LLR).

The 1.0Ha portion of contracted land in 129 Gilligan's Gully road (the Helms block) is rurally zoned and is presently outside of the area currently proposed to be re-zoned as LLR.

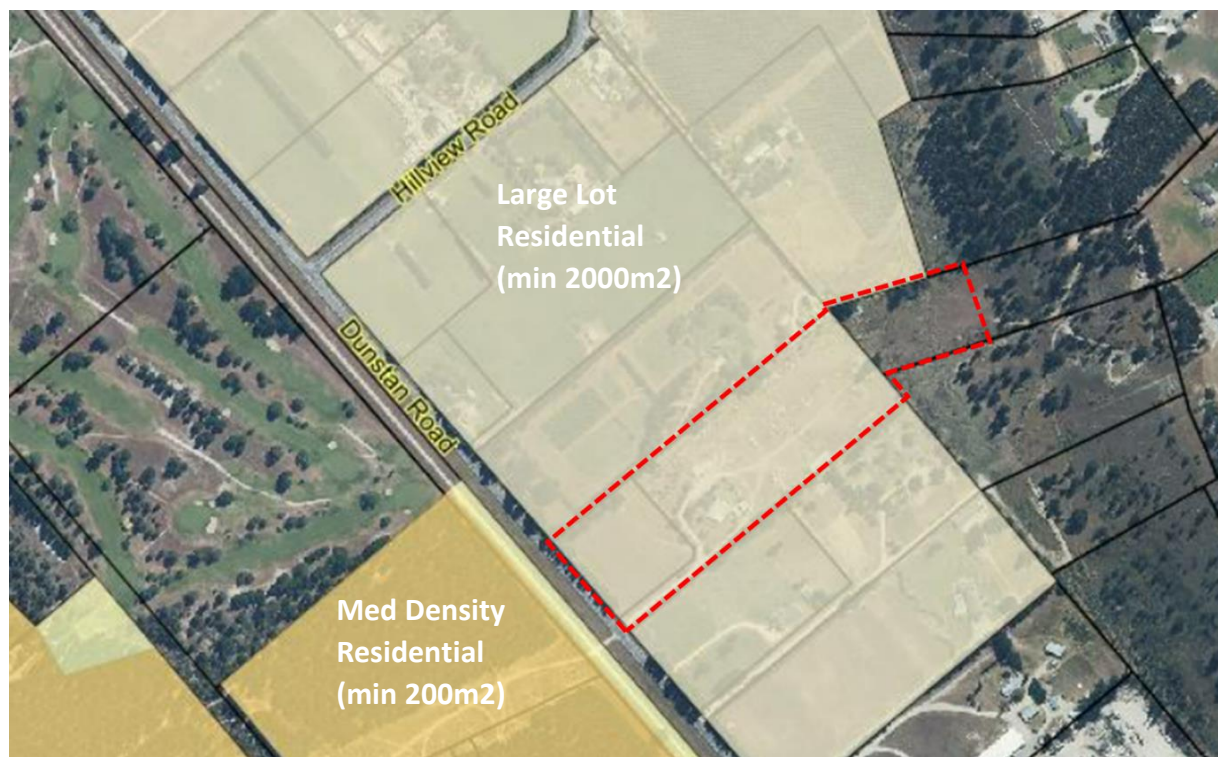


Figure 2: CODC Plan Change 19 notified map with overlay of subject land

### 4. Changes we seek to the residential zoning rules notified in Plan Change 19

We ask that Council:

- a) rezone the Subject Land to **Low Density Residential** (500m<sup>2</sup> min lot size), EITHER
  - i. From the boundary of the Fulton Hogan/Otago Bees industrial blocks to the east, up to and including the Subject Land, OR
  - ii. Solely the Subject Land, excluding the properties between the industrial blocks and the subject Land.

OR ALTERNATIVELY

- b) rezone the Subject Land to **Large Lot Residential (P1)** (1000m<sup>2</sup> min lot size), EITHER
  - i. From the boundary of the Fulton Hogan/Otago Bees industrial blocks to the east, up to and including the Subject Land, OR
  - ii. Solely the Subject Land, excluding the properties between the industrial blocks and the subject Land.
- c) In conjunction with intensifying the zoning as proposed in (a) and (b) above, it may be appropriate to maintain some **buffer zone** to the north-west of the industrial zone (the Fulton Hogan and Otago Bees blocks), within 131 Dunstan Rd. This would minimise issues of reverse sensitivity. See Section 7.7, below, for further discussion.

- d) Provision in its **roading infrastructure** planning for suitable intersections onto Dunstan Road. One from the north, out of the Subject Land. The other being from the south, out of Council's Dunstan Pines area. See Section 9.2, below, for further discussion.
- e) Ensure that some suitable neighbourhood-scale **retail/hospitality activity** is enabled within the predominantly residential land use along Dunstan Road to serve the population that will become established there. See Section 10, below, for further discussion.

## 5. Aspects of Plan Change 19 that we support

We are in general support of the intent and proposed rules contained in Plan Change 19, notably:

- The provisioning for growth in the township area of Alexandra;
- Enabling intensification in areas with suitably infrastructure and amenity;
- Varied lot sizes; and
- The objective of establishing clear rules.

## 6. General Observations

Two general observations we make (not directly related to the specific changes we seek in Section 3 above) are:

- a) We observe that Council is putting itself and Ngai Tahu in the position of being the sole landowners and developers of greenfields medium density residential development.

We question why Council has not found fit to provide areas/opportunities for the private sector to deliver greenfields medium density development?

Council planners have indicated to us that lower densities are appropriately provided for on large greenfields sites (coincidentally owned by Council/Ngai Tahu). But we would contend the opposite is in fact the case.

Larger lot sizes are able to be efficiently organised on large greenfield areas. Large lots sizes ARE NOT able to be efficiently created across the disaggregated 1-4Ha privately owned lots along the north of Dunstan Road, involving irregular lot sizes and existing infrastructure.

To best utilise available land, Council's large landholding might best accommodate lower density and existing small blocks on the north of Dunstan Road would be best utilised in a higher density zoning?

- b) Further to the point above, the only greenfields area north of Dunstan Road presently zoned as Low Density Residential (500m<sup>2</sup>) is also Council owned. Again, why does Council consider it needs to deliver all greenfields higher density urban housing in this area?

## 7. Rationale for the re-zoning we seek of the Subject Land along the north side of Dunstan Road

The basis upon which we contend it is appropriate to zone the Subject Land to either Low Density Residential or Large Lot Residential (P1) are as follows:

### **7.1 Consistency with surrounding zones and land use:**

Immediately across Dunstan Road, opposite the Subject Land, is a large area of proposed Medium Density zoning allows for lot sizes down to 200m<sup>2</sup>.

And further to the east, along Dunstan Road, the proposed zoning is Low Density (500m<sup>2</sup>).

The zoning of the subject land to a minimum of 2000m<sup>2</sup> is incongruous adjacent to these areas.

The only obvious reason that the Low Density zone on the North side of Dunstan Road, to the east, stops where it does at the boundary of the Fulton Hogan site is one of (arbitrary) interruption by the Fulton Hogan yard at 113 Dunstan Rd. We contend that this is not a reason to drop down from a 500m<sup>2</sup> minimum density to a 2000m<sup>2</sup> density on the other side of that two-lot wide industrial area.

Were it not for that interruption of that industrial land it can be reasonably assumed the low density zoning would have continued west along the north side of Dunstan Rd up to or past the Subject Land.

### **7.2 Promoting efficient land use in what will become “central” Alexandra**

The future growth of Alexandra township will be to the north-west, along the corridor created by SH8 and Dunstan Road, incorporating the Subject Land.

In the future, when looking back in hindsight, we suggest that zoning the Subject Land to a 2000m<sup>2</sup> minimum will be seen as an inefficient or even wasteful use of land.

Relying on further infill subdivision of this land in the future to address that excessive lot size is poor planning. We suggest it is appropriate to zone to a more likely final scale now.

### **7.3 The Subject land IS NOT consistent with the purposes offered for the proposed Large Lot Residential zone**

The LLR zone references being located in “outer residential areas”. We submit that the Subject Land is not today, and certainly won’t be in the future, an *outer area*.

Refer Figure 3, below, showing concentric circles of 500m from the town centre (taken as Countdown for this purpose). This enables a comparison of where the Subject Land sits in relation to other parts of the town.

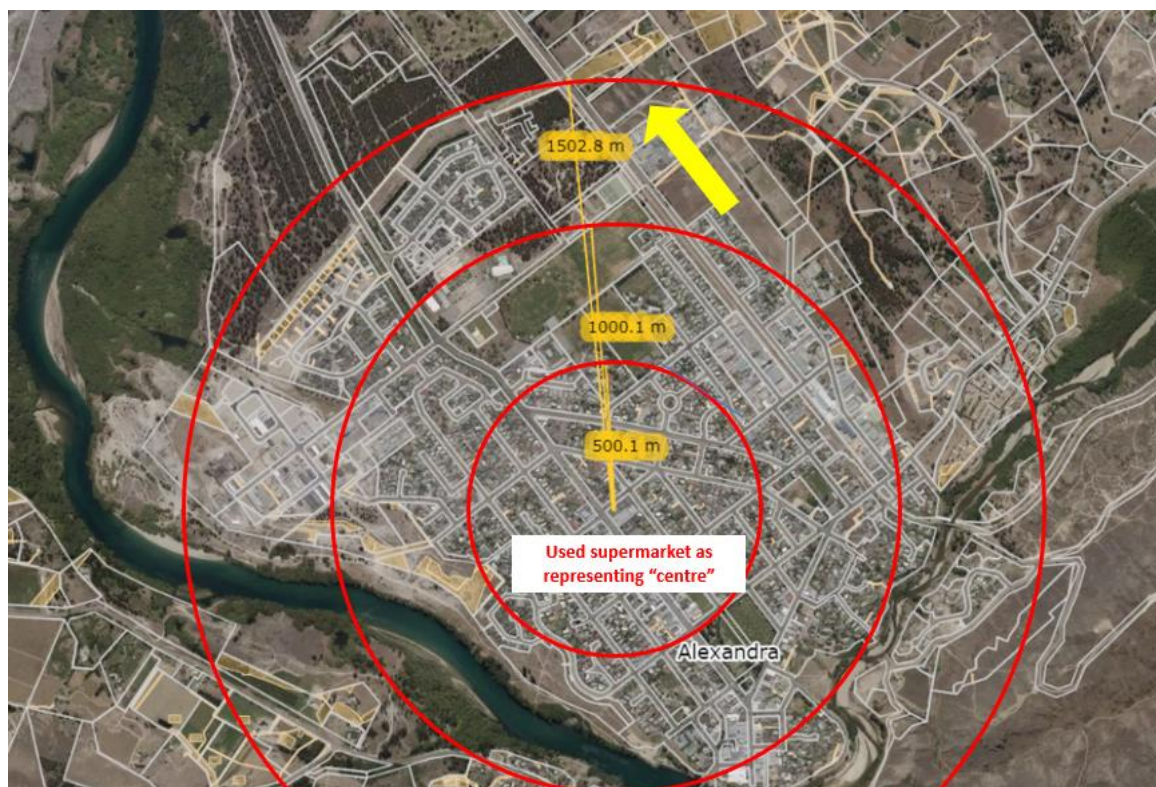


Figure 3: concentric radius from town centre

Being the “lowest [density] of all of the residential zones”, LLR is intended to provide a “high open space to built form ratio” (Plan Change 19 – Residential Chapters: Appendix 5).

The drivers for this higher degree of open space in the LLR zone are assumed to include:

- a) landscape values (i.e. the incongruity of seeing higher density built form within the receiving environment); and
- b) the need for more private open space around peoples’ houses due to an absence of public open space.

Dealing first with *visual impact and coherence of built form in the receiving environment*: It cannot be said that preserving openness and landscape values in this particular area is a planning imperative. Directly opposite is a large block of Council land that will be turned into medium density housing. Next door is an industrial area. Adjacent to the Subject Land is a high voltage power line with large lattice towers and multiple conductors. This area is helpfully framed by a green belt rising up behind. Plan Change 19 seeks to preserve this green face. We support that notion. That natural green backdrop and the amenity it provides can be argued to enable a higher density. We suggest it will in fact become more visually coherent to have it used at a higher density than the lower 2000m<sup>2</sup> density.

Dealing with *open space*: There is no planning rationale to provision >2000m<sup>2</sup> lots in this location for the purposes of private amenity. With the cycle trail, tennis courts, netball courts, sports fields, the local swimming pool, a golf course, a squash club, and both primary and high schools, all on the doorstep, there is arguably no place in Alexandra better served by public space and amenities. This area is extremely well suited to higher density urban living.

Finally, the lower density of the LLR zoning is described in Appendix 5 as being “to maintain the existing amenity and character of these areas.”

Amenity is dealt with above – there is ample open space and amenity in this location. In fact, Council’s focus should be on enabling more people to access and enjoy the amenity provided by the Molyneux Park area rather than fewer.

Likewise, we contend that this area is not one where existing “character” demands the lowest version of residential density. A significant aspect of the existing character of this area is created by the band of trees on the face to the north of Dunstan Road, behind the subject land. Appropriate intensification of this Subject Land will have no adverse impact the character of that treed backdrop.

Moreover, the “character” of this area will be heavily impacted by the medium density (200m2 lot) housing on the other side of the road. It may well be that this inconsistency of zoning on either side of the road will define the character of the area more than anything else, but not in a good way.

#### 7.4 The Subject Land IS consistent with the purposes of the Low Density residential zone

The notified Plan 19 Residential Chapter Provisions – Appendix 5 state that:

*“The Low Density Residential Zone covers the majority of the residential areas in the townships of Alexandra, Clyde and Cromwell, as well as all of the residential areas in the townships of Roxburgh, Ettrick, Millers Flat, Omakau, Ophir, St Bathans, Naseby, Ranfurly and Patearoa.”*

Considering this statement, it is seemingly appropriate to have 500m2 lots in say Ettrick, Millers Flat, and Patearoa, where space is plentiful, and yet, in this subject area, which is fast becoming a central Alexandra residential precinct, and is 300m from the largest recreational facility in central Otago, with primary and secondary schools within *safe* walking distance, it is considered necessary to require a minimum of 2000m2 lots? That does not make sense.

Furthermore, the higher density zonings are stated in Appendix 5 as being appropriate where they are “within a walkable distance of commercial areas or other key community facilities”. This is certainly the case for the Subject Land.

#### 7.5 Proximity to amenity

We offer several visual representations in Figures 4 and 5 below, which highlight how the subject land is both central and very well connected to local amenities for recreation, work, hospitality and education. These images speak for themselves.



Figure 4: Distance of Subject Land to notable local amenities and services



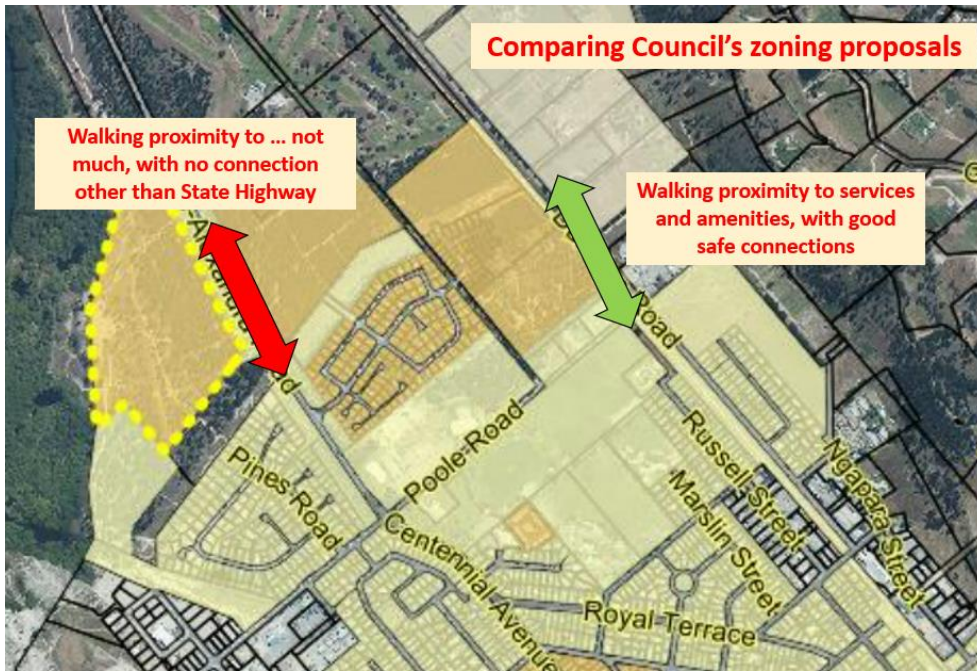


Figure 5: CODC Comparison of Subject Land and proposed medium density area

### 7.6 Picking a suitable transition point from Low Density Residential to Large Lot Residential

It is acknowledged that it is appropriate to transition to a lower density at some suitable location along the north side of Dunstan Road.

It appears that Council have used the convenience of the interruption of industrial land at 113-129 Dunstan Road (Fulton Hogan and Otago Bees) to force that transition from LRZ to LLR.

This transition point is not supported by sound planning logic, and rather seems to be driven by a desire not to force winners and losers by defining a more suitable transition point further to the north-west. Figure 6 offers some context.

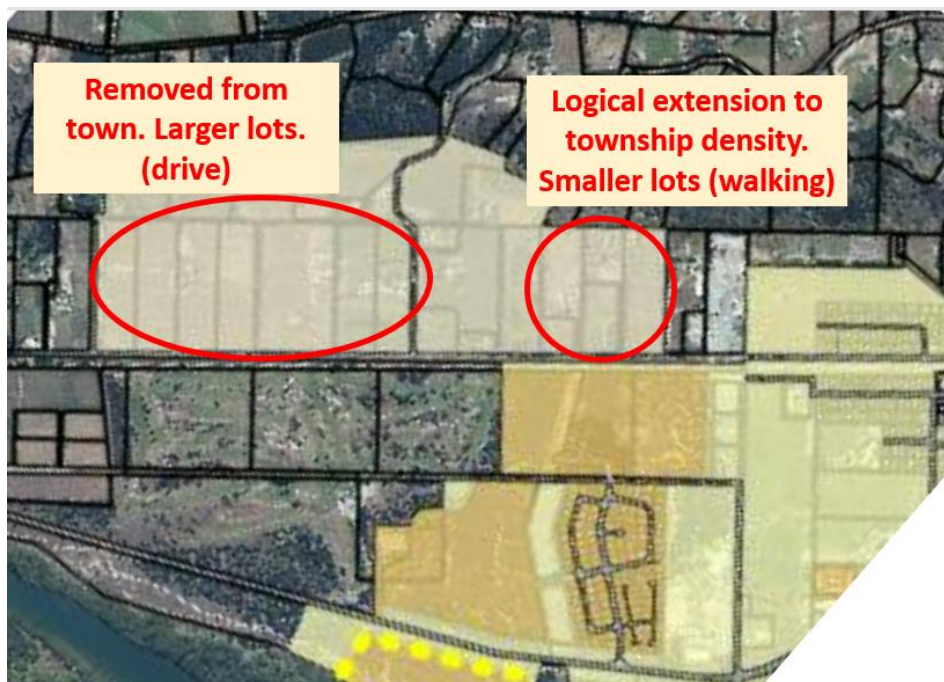


Figure 6: Evaluating where along Dunstan Road a transition between housing density might be appropriate

## 7.7 Addressing the impact on yield arising from the proposed re-zoning

It has been suggested by Council's planners that Plan Change 19, as notified, already has enough yield (i.e. number of potential houses) to accommodate forecast growth over the chosen planning horizon. This was offered as a reason to **not** extend a more suitable higher density zoning along the north of Dunstan Road to the Subject Land.

We cannot comment on whether or not the notified Plan Changes for Alexandra township and the Vincent Ward will create enough yield. However, we make several observations:

- a) It is virtually impossible to achieve theoretical yield when re-zoning brownfields areas. Small land holdings, existing infrastructure, and preferences of existing private owners, all hinder the conversion of land into smaller sections.
- b) Seldom has any District Council Plan Change over provisioned. Where it does, so long as infrastructure is not put at risk, what is the problem with letting the market address the rate at which that potential yield is realised?
- c) Addressing housing affordability demands a somewhat generous approach to provisioning for future growth. As opposed to choking appropriate land and housing supply.
- d) And if it is correct that Council have provisioned adequately, we note that Council have deemed it appropriate to propose zoning all of its approximately 47ha of adjacent land and 18Ha of nearby Ngai Tahu land to minimum 200m<sup>2</sup> lots. If over-supply of land were an issue which needs to be managed, surely some of that Council-owned land would be appropriately zoned for a more typical 500m<sup>2</sup> typology, thus dramatically reducing total forecast yield from the Plan Change?

A numerical analysis of the yield differences arising from our proposed rezoning is given in Section 11, below.

## 7.8 Addressing concerns around reverse sensitivity next to the Industrial Area

We have been advised by Council's Planners that Council is sensitive to the concerns of the industrial occupiers of 113-129 Dunstan Road (Fulton Hogan and Otago Bees). More residential land use immediately adjacent to those properties creates the potential of reverse sensitivity.

We understand Council is intending to address this on the eastern side of the Fulton Hogan block by creating a reserve on its land, to act as a buffer.

If, to support higher density on the western side of the industrial block, a buffer is deemed necessary, then there would be a variety of planning mechanisms Council could employ. This might be achieved by requiring a strip of 2000m<sup>2</sup> lots along that western boundary of 127-129 Dunstan Road? Or by mandating a larger than normal building set-back? Or by some other planning mechanism?

This issue of reverse sensitivity is not itself a sound reason that all land to the north-west, including the Subject Land, must have LLR status rather than LRZ or LLR (P1) status.

### 7.9 Addressing the stated objective of creating a mix of typologies and lot sizes

A stated objective of Plan Change 19, as captured from community feedback, is to create a mix of typologies (lot sizes) and encourage a mix of house types. The images in Figures 7-9 below illustrate Council's response to this objective, showing the relative areas provisioned for each of Large Lot Residential (LLR) at 2000m<sup>2</sup> minimum, Large Lot Residential (P1) (LLR1) at 1000m<sup>2</sup>, and Low Density Residential (LRZ) at 500m<sup>2</sup> minimum area. It is notable that LLR (P1) is used, other than in two small existing precincts.



Figure 7: proposed LLR areas



Figure 8: proposed LLR (P1) areas

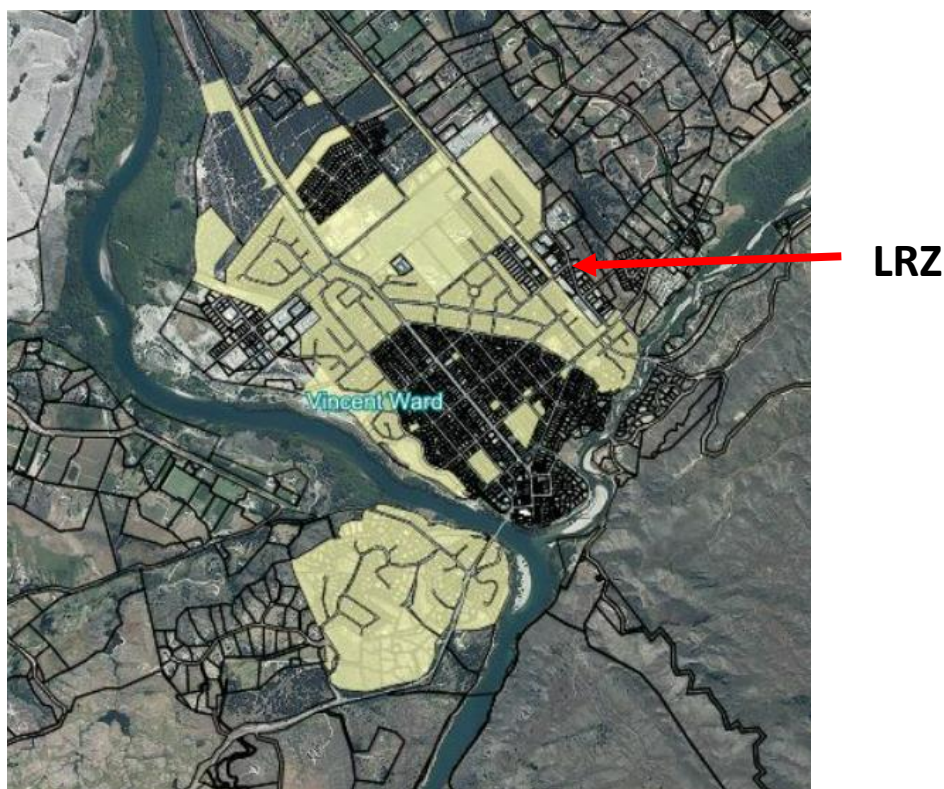


Figure 9: proposed LRZ areas

We suggest that either a 500m<sup>2</sup> or 1000m<sup>2</sup> minimum density across the Subject Land is consistent with providing variety. This is particularly the case where the underlying land is made up of small 1-4Ha lots with a significant amount of existing infrastructure. Subsequent subdivision will necessarily have to take into account small irregular parcels, and have to work around existing buildings and accessways. There will have to be a variety of lot sizes created within that area.

#### 7.10 Assisting to minimise CO<sub>2</sub> Emissions

A lot is being said presently about the need to promote denser townships and encourage less use of vehicles, reducing CO<sub>2</sub> emissions. This subject area is within walking and biking distance to services and amenities. Why waste the opportunity to have more population in this area in the future by mandating over-sized lots, and limiting the number of families who are in walking and biking distance of schools, recreation and sports facilities, as well as town services.

### 8. Incorporating the Helm Block into the residential zone

We seek that Council incorporate a 1.05Ha portion of 129 Gilligan's Gully Road, adjacent to 155 Dunstan Road, (the Helm block), presently zoned Rural, into the neighbouring proposed residential zone. A Surveyed presentation of this area is included as Figure 10, below.

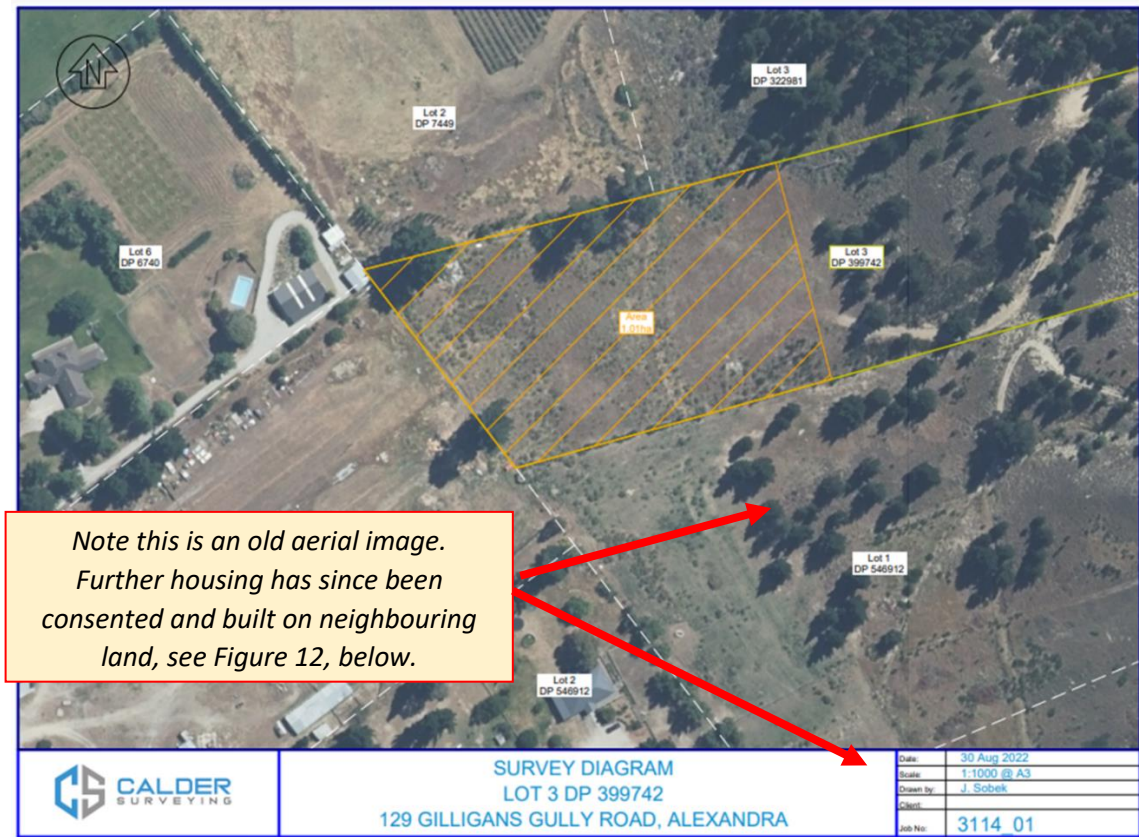


Figure 10: Surveyed area to include in neighboring residential zone

This area is shown, with blue shading, in Figure 11 below, being a map taken from Council’s earlier Vincent Spatial Plan document.

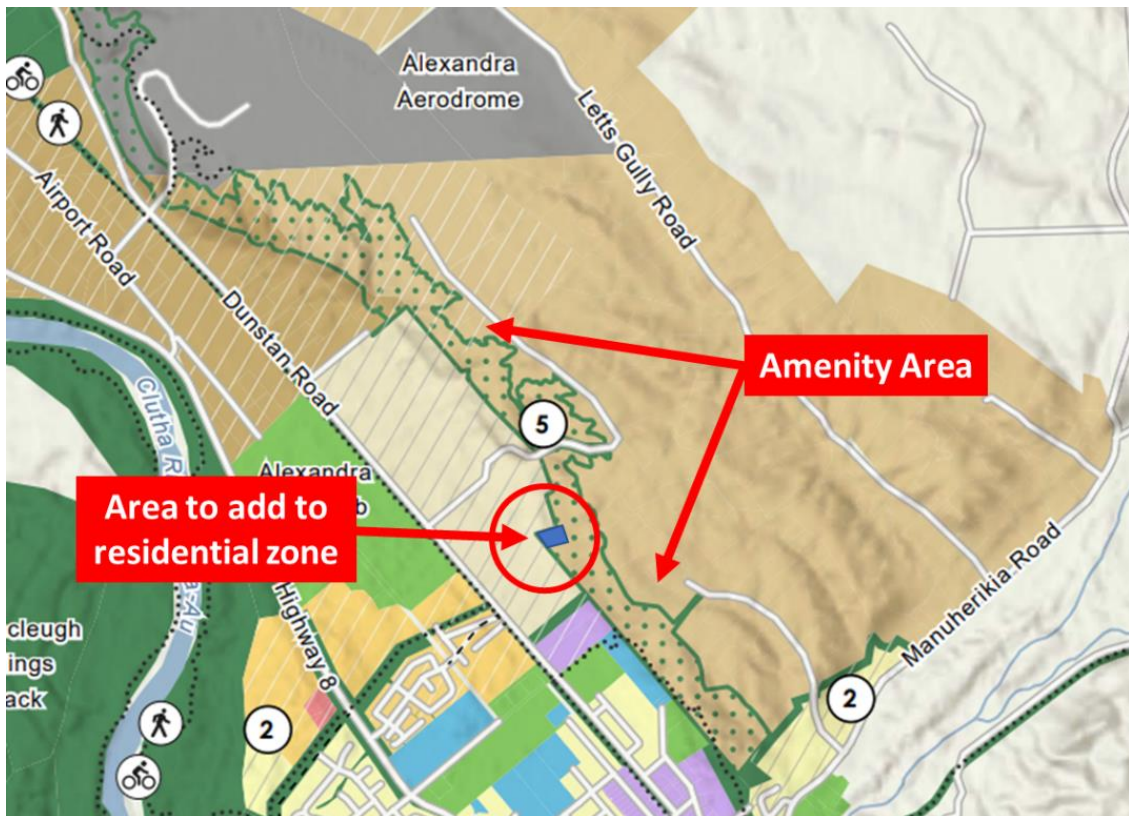


Figure 11: Vincent Spatial Plan map, showing land in proposed amenity area

It is presently within an amenity area (green spots), described in the earlier Vincent Spatial Plan document as follows:

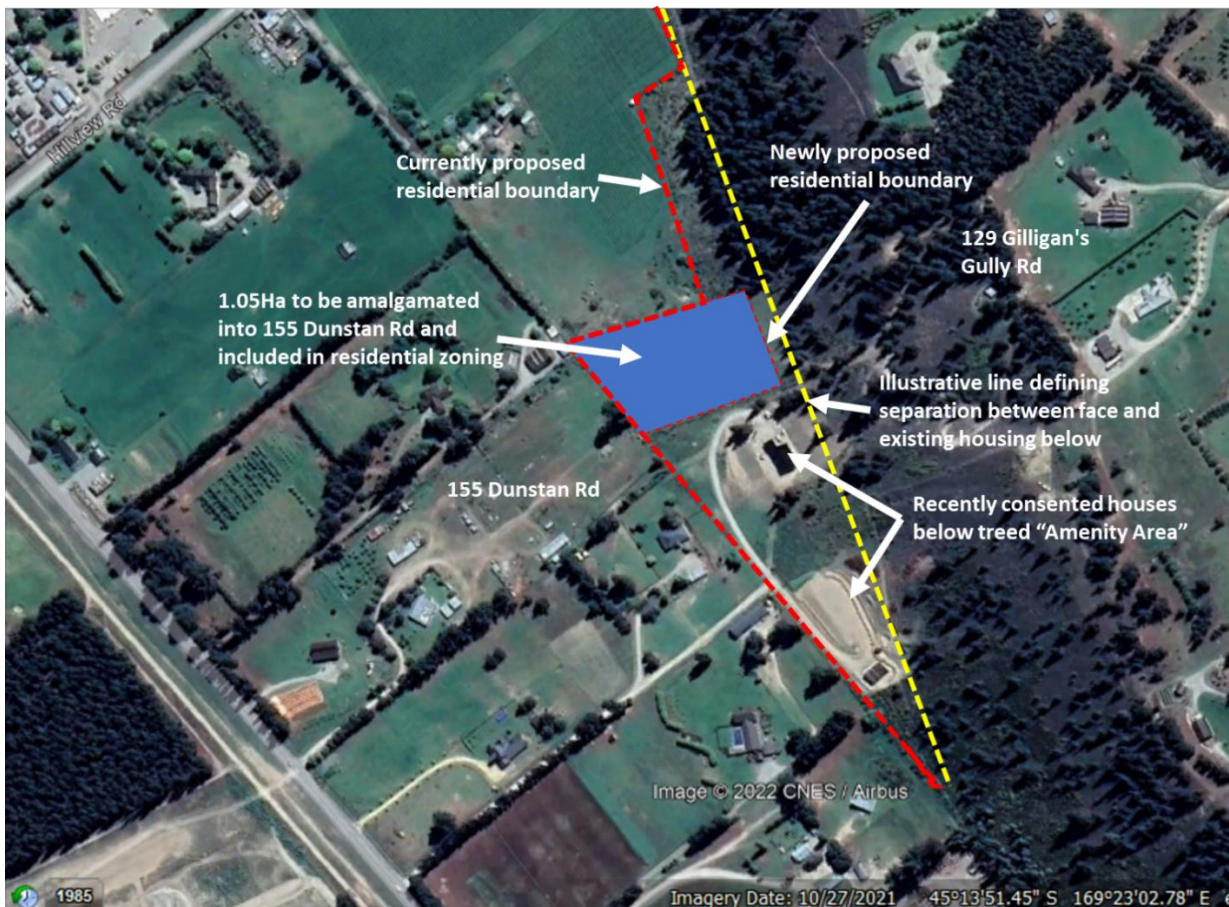
*“an amenity area would be added along the eastern terrace embankment providing opportunities for a stronger natural landscape backdrop to Alexandra, Clyde and recreation links.*

The 1.0Ha area we describe as the *Helm block* (I e. not the entire existing title) is only excluded from the residential zoning proposed by Plan Change 19 because there has not been a suitable boundary to define it.

One Five Five Developments has a contract to purchase this land and amalgamate it into 155 Dunstan Road. This amalgamation will create a suitable boundary at the bottom of that treed face, with the face above remaining within the rural zoning, thus maintaining its treed character and desired amenity, with the lower (flatter/open) portion being made available for a suitable residential use.

The 1.05Ha Helm block has been specifically and deliberately defined, in agreement between the Helms and One Five Five Developments LP, as being outside of the line of trees and of a grade suitable for inclusion in the residential zone.

A more recent aerial image is shown in Figure 12 below, illustrating residential housing on neighbouring land to the south-east.



**Figure 12: Recent Google Earth map showing relationship of area proposed to be brought into residential zone, with adjacent houses**

As can be seen from Figure 12, there is existing built form up to the bottom of the treed slope to the south, in line with any residential housing that would be created by rezoning the Helm block as residential.

Moreover, this land is physically separated from the balance of 129 Gilligan’s Gully Road, and is practically unusable to the present owners.

It makes good sense, and efficient use of land, to bring it into the adjacent residential zone, and to realign the green belt amenity area as generally indicated by the yellow dotted line in Figure 12.

## 9. Access and roading

### 9.1 Road Speeds

The section of Dunstan Road adjacent to the Subject Land is about to transition from a connecting road (our layperson’s description) to more of an urban street, with considerably more residential lots feeding directly onto it from the north side.

This section of roading could, in the future, support some small-scale hospitality or retail offerings.

There will be a considerable amount of foot traffic and car parking, with people utilising the adjacent sports facilities.

We consider it would be desirable that a 50km speed limit applied to this section of road, out to the golf course boundary to the north-west.

Unfortunately, Council’s recent road speed review process has left this section of road at 80km (<https://lets-talk.codc.govt.nz/proposed-speed-limit-bylaw-2022>). See Figure 13, below.

We are presently engaging with Council roading personnel to see if there is any further road speed review process where this speed limit could be revisited.

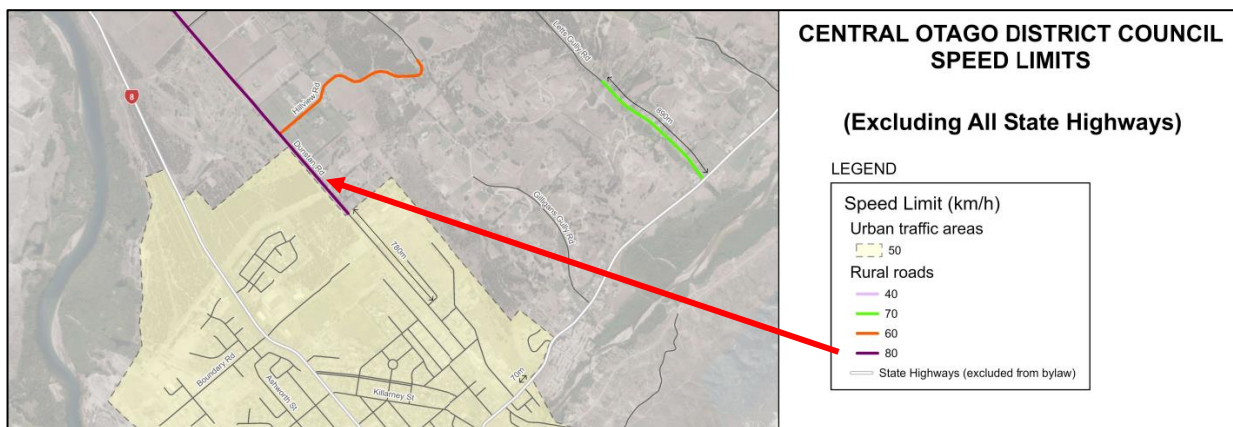


Figure 13: Vincent Spatial Plan map, showing land in proposed amenity area

### 9.2 Planned Intersections

The exit from 155 Dunstan Road, and associated T-intersection, will be vested road (as it will serve >6 lots). The shape of the 155 Dunstan Road title, with a pre-existing leg-in off Dunstan Road, defines the fixed location of that intersection.

We understand that Council may, in the future, create an access and T-intersection, exiting from the Dunstan Pines area to the south onto Dunstan Road. This intersection will need to be established with

the support of DoC, who control the Cycle Trail. We note that the high voltage power lines also cross Dunstan Road in this vicinity.

We have made some preliminary inquiry with a roading engineer. That engineer confirmed that there will have to be some offset between the exit from 155 Dunstan Road (fixed location) and any exit from the Pines area on the other side. See Figure 14, below.

The scale of that offset is not known. However, we think it prudent to bring this design constraint to the attention of Council’s infrastructure and roading personnel as early as possible.

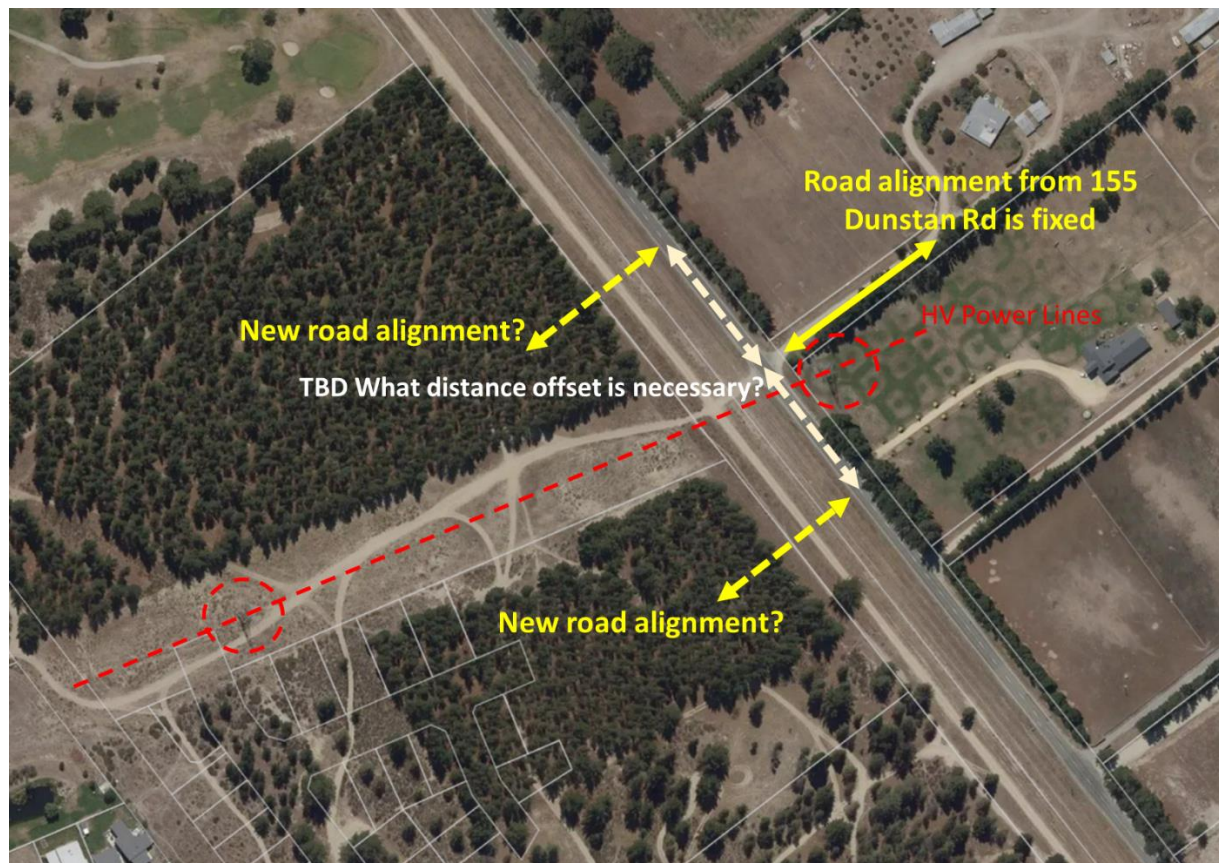


Figure 14: Illustration of intersection alignment and placement along Dunstan Road

## 10. Provisioning for appropriate small scale urban “convenience” retail along Dunstan Road

Another factor that we consider speaks to the desirability of extending a higher density LRZ or LLR (P1) density to the Subject Land is to provision for some appropriate small-scale retail or commercial activity along Dunstan Road.

This may be appropriate at those future intersections, referred to in Section 9 above.

Retail or commercial may also be a suitable use for land in close proximity to the adjacent HV power lines, where residential houses will not be well suited.

The LLR zoning does not anticipate any form of retail activity.

The Low Density Residential (LRZ) zoning we propose be applied provides that convenience retail is a restricted discretionary activity (LRZ-R11).

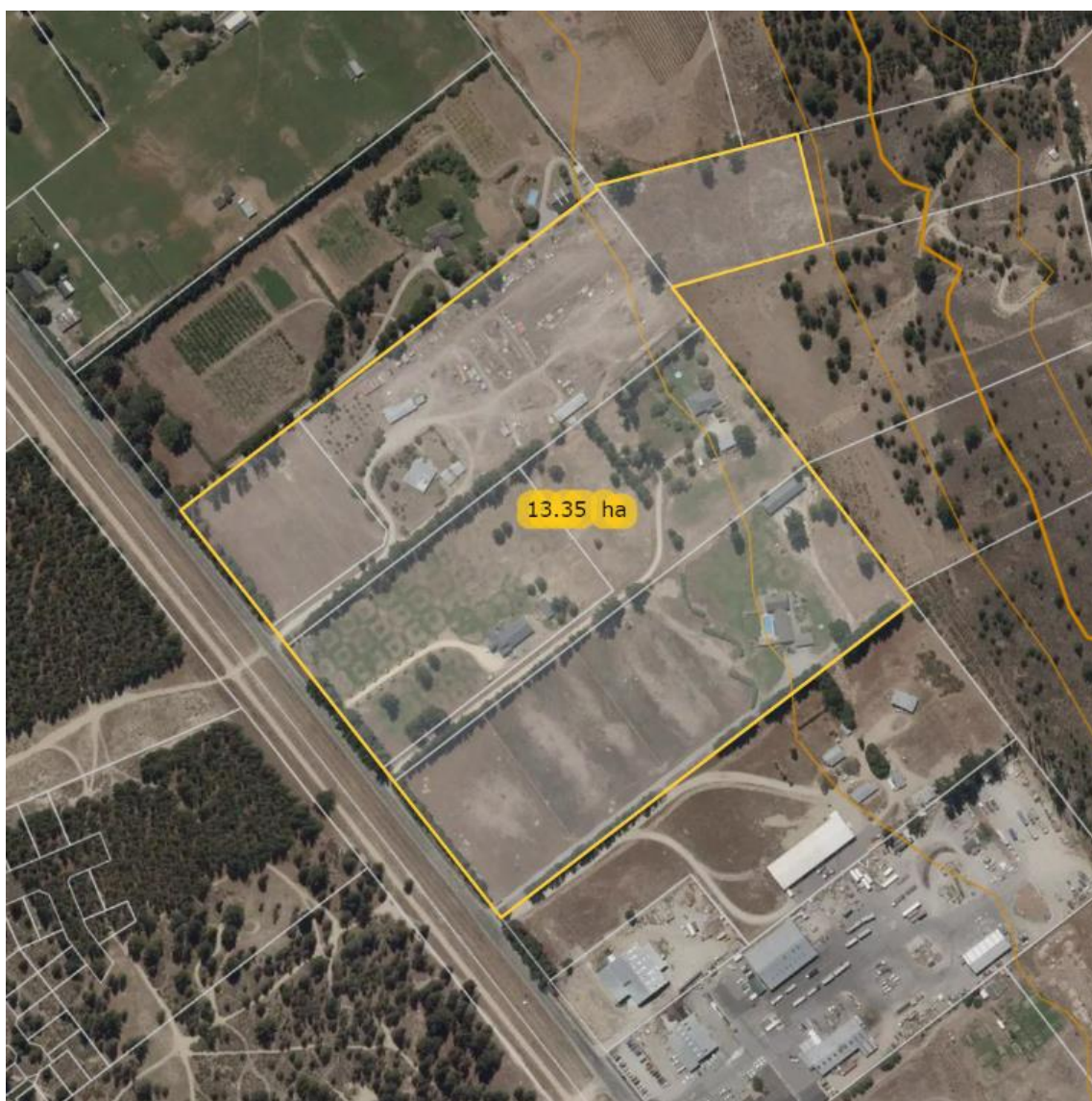


We further propose that some retail activity might also be appropriate for this area if it were zoned to a Large Lot Residential (P1) 1000m<sup>2</sup> scale along Dunstan Road.

Although the Medium Density zoning on the south side of Dunstan Road does anticipate this type of activity in its rules (MRZ-R12), that area is physically separated from Dunstan Road by the Cycle Trail, and so that south side of Dunstan Road is less likely to be suitable for retail.

### 11. Yield analysis of switching from LLR to LRZ or LLR (P1)

We have undertaken some high-level comparisons of the theoretical yield that could arise from rezoning the Subject Land and the three titles between the Industrial Zone and the Subject Land (inclusive), totalling 13.4Ha, as shown in Figure 15, below.



*Figure 15: Aggregate area, if all land back to Otago Bees was re-zoned*

This calculation is set out in Figure 16, below.

155 Dunstan Rd Review of Impact of Reducing Lot Size						LLR	LLR(P1)	LRZ	
Ref	Legal Description	Address	Owners	Total Ha	Available Ha	Min Lot Size	0.2 Ha	0.1 Ha	0.05 Ha
						Effective Area	80%	75%	70%
1	Lot 3 DP 6740	131 Dunstan Rd	Annette & Rex McDonald	4.102	2.460		9	18	34
2	Lot 2 DP 350011	147 Dunstan Rd	Blair & Jasmine Stewart	2.060	0.650		2	4	9
3	Lot 2 DP 546912	149 Dunstan Rd	Jennah and Joseph Hughes	2.060	0.430		1	4	7
4	Lot 1 DP 518150	155 Dunstan Rd	Garden/Collier/O'Docherty	3.125	2.600		10	19	36
5	Lot 3 DP 399742	129 Gilligans Gully Rd	Pip and Aidan Helm	1.000	1.000		4	7	14
6	Lot 2 DP 518150	157 Dunstan Rd	Chris Cameron & Carolyn Patchett	1.070	0.550		2	5	8
				13.417	7.690		28	57	108
				Ratio of Dev Area	57%		Additional Lots	29	80
<i>Available Ha = Area available that can reasonably expect is developed into additional lots, working around existing infrastructure</i>						<i>% Effective Area reduces as lot size reduces due to greater proportion of roading required</i>			

Figure 16: Yield Calculation

Available Ha are calculated for each separate title, as shown in the example of 131 Dunstan Rd in Figure 17, below



Figure 17: Example of effective area calculation

We estimate that this total 13.4Ha aggregated area could yield as follows:

LLR (min 2000m2)	28 Lots
LLR (P1) (min 1000m2)	57 Lots
LRZ (min 500m2)	108 Lots.

This would be reduced if a buffer was introduced along the boundary of 131 Dunstan Road and the industrial zone.

Looking solely at the Subject Land (reference 4, 5 & 6 in Figure 16):

LLR (min 2000m2)	16 Lots
LLR (P1) (min 1000m2)	31 Lots
LRZ (min 500m2)	58 Lots.

We feel this additional population, in this area close to town and all the amenities described, will make a positive contribution to Alexandra progressing as a resilient community. In particular, we feel that the local primary and high schools will be well served by the strong local community that Plan Change 19, with this proposed zoning modification, will deliver.

## **12. Infrastructure Impacts**

We acknowledge that infrastructure, particularly waste water, along Dunstan Road is a current constraint.

There will need to be developer-led constriction of suitable infrastructure to give effect to any rezoning to residential along Dunstan Road.

We have made initial inquiries of Fluent Solutions (Anthony Steel), who has undertaken an engineering options evaluation for William Hill and Council. We are advised by Fluent that there are feasible engineering solutions to having additional capacity as a result of higher density zoning being applied to the Subject Land.

Further analysis of the scale of that infrastructure, and of how it will be delivered, will be required. We would engage Fluent to further evaluate the additional infrastructure required to serve the Subject Land and our development.

One consequence of higher density being applied to the Subject Land is that the additional lots and housing will contribute greater development contributions and subsequently rates to fund the required water and waste water services.

## **13. Competence and Cooperation**

We consider ourselves a competent and responsible developer. We want to make a positive contribution to our community and the Alexandra township through the appropriate development of the Subject Land.

We will assist in the implementation of suitable infrastructure. We understand the need to cooperate with Council and other developers in achieving this.

## **14. Conclusions**

The Subject Land is not an outer area, it is in the heart of Alexandra's growing residential precinct.

There are a range of compelling reasons, set out in Section 7 above, why it is appropriate to give a higher density zoning to the Subject Land than the proposed LLR zone.

There are few compelling reasons why not to adopt this change.

Accordingly, we ask that the subject land be zoned for a more efficient, smaller lot size than the LLR (2000m<sup>2</sup> min) proposed. We seek that the zoning conferred to the subject land Low Density (500m<sup>2</sup> min) or Large Lot Residential (P1) (min 1000m<sup>2</sup>).

We understand that infrastructure issues to be addressed, in particular in regard to roading and wastewater. But we also understand that viable options have been identified. Infrastructure is not a reason to not utilise this land area well.

Thank you for the opportunity to make this submission in support of Plan Change 19. We trust you find the information presented here is helpful.

We note that we wish to present this submission to the Hearing in person. Full size A4 copies of each of the maps and figures shown here will be made available to parties at the Hearing.