

17th December 2024

City Planning
Dunedin City Council
PO Box 5045
Dunedin

SUBMISSION ON PLAN CHANGE 1

This is a submission on Plan Change 1 to the Partially Operative Dunedin City Second Generation District Plan (2GP). This submission has been prepared by Patersons, on behalf of the Submitter named in the information below.

Submitter details:

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It is advised that the Submitter will not gain an advantage in trade competition through this submission.

Submission (multiple submission table):

PC1 ID:	All of PC1
Provision Name:	All proposed changes.
This submission seeks:	Accept the changes (in part). Reject the changes (in part).
Reasons:	This submission item relates to all of the proposed PC1 changes, including those that are not specifically discussed in the submission table below. The Submitter has an interest in the whole of the Plan Change given the interrelatedness between each provision. The Submitter seeks to reserve the ability to provide a further submission on any matters raised by other submitters.

Withdrawn

PC1 ID:	CP4
Provision Name:	Rule 17.10.4.1.X Rule 19.10.5.1.X Rule 28.8.4.6.X

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	<p>Rule 31.9.4.6.X Rule 34.10.5.1.X</p>
This submission seeks:	If the change is not rejected, amend as outlined below.
Reasons:	<p>This submission item relates to the issue of stormwater management.</p> <p>The rules noted above should be rejected, unless the target provisions, being those contained in Rule 9.6, can be adjusted to provide for more efficient and effective outcomes.</p> <p>Rule 9.6 includes Rule 9.6.2.2.b, which links to Objective 9.2.1 and Rule 9.9.3.</p> <p>Rule 9.9.3.7 currently states: <i>“Stormwater management information required outside a new development mapped area must demonstrate how Policy 9.2.1.7 will be achieved by:</i></p> <ul style="list-style-type: none"> <i>a. providing a stormwater management proposal prepared by a suitably qualified person, which:</i> <ul style="list-style-type: none"> <i>i. contains a level of detail commensurate with the scale of the subdivision, land use or development activity;</i> <i>ii. reflects the scale of any stormwater management issues in the catchment and any capacity constraints in the public infrastructure network; and</i> <i>iii. where available, follows any relevant guidance on acceptable stormwater management solutions for similar activities in a similar context; and</i> <i>b. for subdivision activities that result in more than six lots, or development areas greater than 1ha, providing an integrated stormwater management plan where requested by Council.”</i> <p>The Submitter seeks an adjustment to be made to Rule 9.9.3.7 so that it instead reads (adjustments shown using strikeouts and underlines): <i>“Stormwater management information required outside a new development mapped area must demonstrate how Policy 9.2.1.7 will be achieved by:</i></p> <ul style="list-style-type: none"> <i>a. providing a stormwater management proposal <u>assessment</u> prepared by a suitably qualified person, which:</i> <ul style="list-style-type: none"> <i>i. contains a level of detail commensurate with the scale of the subdivision, land use or development activity;</i> <i>ii. reflects the scale of any <u>published</u> stormwater management issues that apply in the catchment and any capacity constraints in the public infrastructure network, <u>as are known to affect the site or any infrastructure within a 1km distance downstream of the site</u>; and</i>

- iii. *where available, follows any relevant guidance on acceptable stormwater management solutions for similar activities in a similar context; and*
 - iv. *determines whether on-site stormwater detention is necessary or not, and if necessary, the overall volume of stormwater detention storage required and the design maximum stormwater discharge rate for the overall site.*
 - v. *in the event that stormwater detention is necessary, then a method, such as a set of proposed consent conditions, to ensure that the proposed development will implement and maintain the necessary infrastructure.*
- b. *for subdivision activities that result in more than ~~six~~ twenty lots, or development areas greater than 1ha, providing an integrated stormwater management plan where requested by Council.”*

The proposed adjustment at 9.9.3.7.a is intended to improve interpretation of the stormwater evaluation provisions by removing the reference to ‘management’. Management is tool that will occur as a consequence of the evaluation, during implementation of the stormwater solution. At the time that Rule 9.9.3.7.a is applied, the better terminology is ‘assessment’, as the Submitter has proposed. This will reduce the current level of interpretation issues that the land development profession finds commonly associated with terms such as ‘stormwater management’, ‘stormwater management plan’ and ‘stormwater assessment’.

The proposed adjustment to Rule 9.9.3.7.a.ii is intended to provide better direction to users of the 2GP, in respect to stormwater assessments. It is important that the City’s stormwater issues are well understood and that this information is made available to applicant and to land development professionals. Where there are no clearly published issues, applicants and professionals must be able to adopt a position that there are no issues. The second part of the proposed change to Rule 9.9.3.7.a.ii is intended to localise the assessment to a reasonable catchment for assessment purposes. For instance, it is unreasonable, in the Submitter’s opinion, for Council to ask an applicant of a site at the top of Brockville to assess the effects of stormwater discharge from the site on the land at the lower end of Kaikorai Valley. There needs to be a clear and sensible understanding of where the geographical limits of a stormwater assessment are applied.

The proposed additional provisions at Rule 9.9.3.7.a.iv and Rule 9.9.3.7.a.v are designed to ensure that the assessment identifies the appropriate information and that it provides a suitable method for implementation of any necessary stormwater solutions.

The proposed adjustment to Rule 9.9.3.7.b seeks to adjust the size at which an integrated stormwater management plan might be required by Council. An integrated stormwater management plan is

	<p>understood to be a significantly larger evaluation than a stormwater assessment, and the Submitter agrees that there are times that this is an appropriate requirement. However, applying this to a small site of six lots is not reasonable. The 1ha trigger is considered reasonable. A 1ha block of land in the General Residential 1 zone is capable of being development into 20 lots (1 hectare, less 20% for roads and reserves, divided by 400m² minimum site size = 20). Therefore, the reference to six lots should be adjusted to twenty lots, which would bring an improved level of consistency and reasonableness to this provision.</p> <p>If the suggested changes to Rule 9.9.3.7 can be accommodated within PC1, the Submitter would be supportive of the changes proposed by CP4 to Rule 17.10.4.1.X, Rule 19.10.5.1.X, Rule 28.8.4.6.X, Rule 31.9.4.6.X and Rule 34.10.5.1.X.</p> <p>If the suggested changes to Rule 9.9.3.7 are not introduced with PC1, the Submitter will seek to reject CP4 in its entirety.</p>
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PC1 ID:	CP8
Provision Name:	<p>Rule 15.7.6 Rule 16.7.5 Rule 17.7.6 Rule 18.7.5 Rule 19.7.5 Rule 20.7.5</p> <p>(And all other provisions connected to the above Rules, as listed in the PC1 Summary of Changes document).</p>
This submission seeks:	Accept the change.
Reasons:	<p>This submission item relates to the proposed changes to the shape performance standards for new sites that contain existing development.</p> <p>The Submitter supports the changes proposed by CP8, to the extent of the manner in which the provisions have been notified.</p> <p>Should these provisions be adjusted as a consequence of the PC1 submission process, the Submitter may alter this position to instead seek to reject the proposed change.</p> <p>This is because the proposed changes under CP8 are relatively complex and even a small adjustment to the structure of the proposed provisions has the potential to create quite a different interpretation of the new requirements.</p>

PC1 ID:	CP15
Provision Name:	<p>Rule 15.10.1.4 Rule 15.11.1.6 Rule 15.11.1.X Rule 15.12.1.4</p>

	<p>Rule 15.12.1.6 Rule 17.10.1.6 Rule 17.11.1.4</p>
This submission seeks:	<p>Reject the change (in part). Accept the change (in part). Introduce new changes into the 2GP).</p>
Reasons:	<p>This submission item relates to the proposed restriction on the discretion of planners to use a permitted baseline evaluation. The Submitter has concerns that the proposed change in respect to the concept of 'permitted baseline' may be ultra vires. Section 104(2) of the Resource Management Act 1991 (RMA) states:</p> <p><i>When forming an opinion for the purposes of subsection (1)(a), a consent authority may disregard an adverse effect of the activity on the environment if a national environmental standard or the plan permits an activity with that effect.</i></p> <p>Proposed Rule 15.10.1.4 states:</p> <p><i>With respect to section 104(2), Council will not consider ancillary residential units as part of the permitted baseline in considering residential density effects in the residential zones.</i></p> <p>Proposed Rule 15.11.1.X states:</p> <p><i>With respect to section 104(2), Council will not consider potential permitted new buildings and structures or compliance with the maximum building site coverage and impermeable surfaces performance standard (Rule 15.6.10) as part of the permitted baseline in considering the effects of subdivision activities on stormwater management in the residential zones.</i></p> <p>The concern held by the Submitter is that the proposed rule appears to contradict an express directive imposed by a high-order regulation.</p> <p>The purpose of clause 104(2) of the RMA is to provide discretion to the processing planner to apply an established planning practice. The planner is able to choose whether or not to apply the permitted baseline test, as a method to reach a fair and balanced decision. A district plan cannot, in the Submitter's opinion, impose a rule that overrides the permitted baseline method the is provided for in the RMA.</p> <p>For this reason, the Submitter seeks rejection of the CP15 change where this seeks to introduce new rules that constrain the application of the permitted baseline test.</p> <p>With respect to the aspect of CP15 that seeks to remove existing Rule 15.11.1.6, existing Rule 15.12.1.4, existing Rule 17.10.1.6 and existing Rule 17.11.1.4 from the 2GP, the Submitter is supportive of these changes.</p>

	<p>Furthermore, the Submitter seeks the removal of all other elements of the 2GP in which the district plan contains similar rules that are designed to override the permitted baseline provisions of the 2GP. These elements include-</p> <ul style="list-style-type: none"> • Rule 15.4.4 • Rule 15.13.1.3 • Rule 16.4.6 • Rule 16.10.1.6 • Rule 16.11.1.4 • Rule 16.12.1.4 • Rule 17.4.6 • Rule 17.10.1.6 • Rule 17.12.1.4 • Rule 18.4.5 • Rule 18.11.1.2 • Rule 18.12.1.2 • Rule 19.4.4 • Rule 19.11.1.2 • Rule 19.12.1.2

PC1 ID:	CP16
Provision Name:	Rule 6.11.2.7 Rule 6.14.2
This submission seeks:	If the change is not rejected, amend as outlined below.
Reasons:	<p>This submission item relates to the discretion for Council to require an ITA for subdivision.</p> <p>The Submitter is generally agreeable to this change, however wishes to stress that this provision should remain a '<u>may</u> require' provision (as proposed) and should not become a '<u>will</u> require' provision.</p> <p>The Submitter also seeks the inclusion of additional guidance notes that describe when a subdivision activity might be expected to trigger the requirement for an ITA. Some suitable guidance in this respect will reduce the potential for disagreement between applicants and Council on whether an ITA is needed. As a starting point, the Submitter suggests the following thresholds might be used to guide this provision-</p> <ol style="list-style-type: none"> 1. For proposed subdivision that comprises more than twenty lots, and/or 2. Where there are published transportation issues that exist within the roading network in close proximity to the subdivision site.

	The Submitter is open to discussing the nature of these thresholds with Council's Transport department prior to the PC1 hearing phase if that would be helpful.
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PC1 ID:	D18
Provision Name:	Definition 1.4.1
This submission seeks:	Accept the change.
Reasons:	This submission item relates to the definition of ground level. The proposed definition of ground level is excellent. This looks to be clear and easily interpreted, and we expect that implemented of this definition will be straight-forward.

PC1 ID:	NU2
Provision Name:	Rule 5.6.2 Rule 5.6.2B (note)
This submission seeks:	Accept the change with amendments outlined below.
Reasons:	This submission item relates to the issue of earthworks in proximity to network services. The Submitter seeks the inclusion of an exemption that allows earthworks to be undertaken at, or behind, a boundary line where the boundary line exists within the setback distance. For instance, if a Council sewer pipe is located in the road reserve at a distance of 1.0m from a property boundary, the owner of the adjoining land should not be required to obtain an earthworks consent when looking at undertaking earthworks on their private land up to the boundary line (in this instance the setback distance of 1.5m will technically extend over the boundary by 0.5m). If Council needs to protect infrastructure from possible future earthworks, where the infrastructure is located close to property boundaries, then this should be managed by way of a negotiated easement in favour of Council. The Submitter supports the element of this rule change that reduces the setback distance from 2.5m to 1.5m. The Submitter supports the proposed exemptions listed under Rule 5.6.2.y.

PC1 ID:	NU3
Provision Name:	Definition 1.4.1 (building utilities) Definition 1.4.1 (network utility structures) Rule 5.6.2.1
This submission seeks:	Accept the change with amendments outlined below.
Reasons:	This submission item relates to the issue of earthworks in proximity to network services. Proposed Rule 5.6.2.1 reads-

	<p><i>“Earthworks must be set back at least 1.5m from network utility structures, except where the network utility structure is located on a privately owned property that it exclusively serves.”</i></p> <p>The Submitter seeks a further expand the ‘except where...’ portion of this Rule so that it captures network utilities that are privately owned (by an individual owner or by a collection of owners) and where i) the infrastructure services more than one property, and ii) there is a management regime in place for the infrastructure. An example of a suitable management regime might be a body corporate arrangement, a formal residents association or a legal instrument such as an easement, covenant or consent notice that stipulates management and maintenance responsibilities.</p> <p>Essentially, where there are already suitable protective measures in place, it would seem reasonable and efficient not to impose provisions that would require a specific resource consent to be obtained.</p>
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PC1 ID:	PHS1
Provision Name:	Rule 9.3.3.2 (And all other provisions connected to the above Rule, as listed in the PC1 Summary of Changes document).
This submission seeks:	Accept the change with amendments outlined below.
Reasons:	<p>This submission item relates to the requirements for adequate water supply for fire-fighting purposes.</p> <p>The Submitter seeks the inclusion of an additional provision, to be located between 9.3.3.2.d and 9.3.3.2.e, allowing for an applicant to apply an alternative fire-fighting solution, provided that the applicant can supply Council with written approval for the solution from Fire and Emergency New Zealand.</p> <p>This additional clause will enable the design and implementation of bespoke solutions, where the more standard fire-fighting methods are challenging to apply.</p>

PC1 ID:	PHS2
Provision Name:	Rule 9.3.1 Appendix 9A
This submission seeks:	Accept the change with amendments outlined below.
Reasons:	<p>This submission item relates to the issue of acoustic insulation for management of noise from music venues.</p> <p>Council’s strategy to address the reverse sensitivity issues that arise between music venues in the CBD zone and residential activities in the same zone is to require residential activities to achieve a higher level of acoustic insulation as is currently required.</p> <p>The Submitter has concerns around the effectiveness of this approach to managing reserve sensitivity between incompatible activities in the CBD area. The difficulty with this solution is that it</p>

	<p>will take a very long time to achieve a meaningful degree of improvement. While the new provisions will be able to be applied to new residential developments, the only way that these will be able to be applied to existing residential units is through the building consent process when owners of those units elect to seek a consent for renovation works. It is fair to say that the very fact that these provisions will trigger potentially expensive work, will likely lead to some owners choosing not to renovate existing units. It is the Submitter's opinion that with a handful of renovations occurring every year, it could take many years for a noticeable proportion of existing residential units to be improved in this manner.</p> <p>The Submitter proposes that Council consider a broader range of methods for addressing the issue of reserve sensitivity between music activities and residential activities in the CBD area. As an example, the method of separation, as discussed in the expert evidence report by Styles Group, suggests that a credible option to reduce reverse sensitivity issues would be to enable these activities to occur within zones that do not allow the other activity to be undertaken. In these zones, the issue of reverse sensitivity between these particular activities could be avoided altogether.</p>
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PC1 ID:	Res1
Provision Name:	Rule 15.6.6.2 Rule 15.6.13.1.a
This submission seeks:	Accept the change.
Reasons:	This submission item relates to the height of garages in boundary setbacks. This change makes sense and is supported by the Submitter.

PC1 ID:	Res3
Provision Name:	Policy 15.2.3.1 (And all other provisions connected to the above Policy, as listed in the PC1 Summary of Changes document).
This submission seeks:	Accept the change with amendments outlined below.
Reasons:	This submission item relates to amenity character effects from development. The Submitter notes that the proposed change seeks to replace the term 'sunlight access' with the term 'amenity'. It is suggested that the original term should be retained, as this is more easily interpreted than a general 'amenity' term. The term 'amenity' is vague and may trigger a level of assessment that is unreasonable and potentially unintended by the policy-composers. The inclusion of the part of the clause that brings in consideration of reserves is supported by the Submitter. The Submitter seeks modification of Policy 15.2.3.1 to read:

	<i>“Require buildings and structures to be of a height and setback from boundaries that ensures there are no more than minor effects on the sunlight access of current and future residential buildings and their outdoor living spaces, or on the sunlight access of reserves.”</i>
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PC1 ID:	Res7
Provision Name:	Definition 1.4.1
This submission seeks:	Accept the change with amendments outlined below.
Reasons:	<p>This submission item relates to the definition of building and the inclusion of movable homes and caravans.</p> <p>The Submitter seeks the amendment of the proposed definition of ‘Building’ so that this excludes movable homes and caravans where these structures/vehicles are not being actively used for residential housing.</p> <p>For instance, it is common practice for homeowners to store caravans on their property, for use as holiday vehicles. These owners should not be required to obtain a resource consent, or otherwise relocate their caravan in order to comply with a new rule. It is suggested that a minor change to the proposed definition could be implemented to exclude storage of movable homes and caravans.</p>

PC1 ID:	Res13
Provision Name:	<p>Rule 10.3.3.W</p> <p>Rule 10.3.3.X</p> <p>(And all other provisions connected to the above Rules, as listed in the PC1 Summary of Changes document, including the information shown on the Planning Maps).</p>
This submission seeks:	Accept the change with amendments outlined below.
Reasons:	<p>This submission item relates to the proposed setbacks from open watercourses.</p> <p>Existing Rule 10.3.3.X requires-</p> <p><i>“...new buildings and structures, additions and alterations, earthworks - large scale, storage and use of hazardous substances, and network utility activities must be set back a minimum of 5m from a stormwater open watercourse mapped area.”</i></p> <p>Proposed Rule 10.3.3.W requires-</p> <p><i>“...new buildings and structures, additions and alterations, earthworks - large scale, storage and use of hazardous substances, and network utility activities must be set back a minimum of 20m from a stormwater open watercourse mapped area in the rural zones.”</i></p> <p>Proposed Rule 10.3.3.X requires-</p>

“...new buildings and structures, additions and alterations, earthworks - large scale, storage and use of hazardous substances, and network utility activities must be set back a minimum of 5m from a stormwater open watercourse mapped area in all other zones.”

Additionally, this proposed change seeks to amend the Planning Maps so that these include numerous open watercourse mapped area features.

The Submitter seeks the following adjustments to these provisions. First, the Submitter requests that the setback distances imposed by these rules are reduced-

- In Rule 10.3.3.W, from 20.0m to 7.0m, and
- In Rule 10.3.3.X, from 5.0m to 2.5m.

The suggested reduced distances are considered sufficient to achieve suitable protection from high water flows and to protect the water conveyance function of the watercourse feature, along with enabling any necessary maintenance works to be carried out.

The reduced 7.0m width in the Rural Zones is consistent with the setback standards that Otago Regional Council apply to their drainage channel network. This demonstrates that 7.0m is sufficient for protection and maintenance purposes.

The reduced 2.5m width in other zones is consistent with the 3-Waters approach to setbacks from piped drainage infrastructure, which typically required an easement to be created at 1.5m on each side of the pipe and then a further 1.0m setback from the edge of the easement to any new structures. This 2.5m setback distance is deemed sufficient to enable the maintenance of drainage pipe infrastructure, and the Submitter suggests that this is reasonable for this same setback distance to be applied to the new rules.

Second, the Submitter has concerns around the definition of where the setback distances are to be measured from. Currently, the rules suggest that the setback is to be measured from the mapped area itself, implying that the mapped feature is the starting point for measuring the setback. I highly doubt that the feature mapping that has been used to populate the Planning Maps is particularly accurate, and this could lead to the required setback distances ending up being quite different to the actual distance between the determined setback line and the watercourse feature as it sits on the ground. To resolve this, the rules should be updated to include a reference to where the setback distance is measured from. The easiest way to do this would be to tweak Rule 10.3.3.7 which provides a starting point for measuring setback from water bodies, so that this rule can also be applied to open watercourse mapped areas. The headings for Figure 10.3.3A and Figure 10.3.3B should also be adjusted to include open watercourse mapped areas.

The amended Rule 10.3.3.7 might then read (my amendment underlined)-

“For the purposes of this standard, setbacks will be measured from the bank of the water body or open watercourse mapped area at the point of its annual fullest flow or annual highest level without overtopping its bank (see Figure 10.3.3A and Figure 10.3.3B).”

Third, the Submitter seeks the inclusion of the following exemptions from the new open watercourse mapped area provisions-

1. Where open watercourse features exist close to a property boundary, they should not apply to the adjoining property. I.e. an exemption should be made for the adjoining property, so that the adjoining property owner is not adversely affected by the setback provisions. For example, if a watercourse feature was constructed within say 1.0m of a property boundary, the new setback should extend over the 1.0m distance between the feature and the boundary but should cease at the boundary.
2. An exemption should be made for properties that are subject to recently consented and/or approved developments, and where anticipated land use activities have not yet been fully implemented. For instance, where a stormwater detention swale has, or will be, constructed but houses are yet to be established. In various instances, there are already protective measures in place to manage open watercourses, such as easements, covenants and consent notices, which already serve to address the outcomes sought by the proposed rule changes. Without this exemption there is a risk that approved development may be unreasonably compromised before it can be completed.

Lastly, the Submitter seeks the removal of all open watercourse mapped area features from the Planning Maps where these features relate to large properties of undeveloped land in the residential zones. Potentially any block larger than 1.0 hectares could be seen in this light. The reason for this is that these blocks of land, of which there might be a relatively small number, will almost certainly all be subject to comprehensive future resource consenting processes, at the time that owners seek to pursue development. In many cases, these properties are also subject to New Development Mapped Area (NDMA) provisions. These existing provisions will provide sufficient methods and opportunities for Council and landowners to collectively consider the most appropriate means of managing and protecting any open watercourse features. Such management might often include activities such as replacing open watercourses with piped drainage systems and/or relocating open watercourse to more convenient alignments. These activities are more easily managed through the resource consent pathway than by imposing the proposed open watercourse mapped area features, which then may need to be unpacked from the property at a later date. This would also avoid the need for the Planning Maps to be updated as changes are made to the watercourse features.

PC1 ID:	Res20
Provision Name:	Rule 12.2.1.1 Rule 12.3.1
This submission seeks:	Accept the change.
Reasons:	This submission item relates to the 3-Waters agreements in the RTZ regions. This adjustment appears to be sensible.

PC1 ID:	Res22
Provision Name:	Rule 15.5.2.4 Rule 15.5.2.X Rule 15.10.3.1
This submission seeks:	Accept the change.
Reasons:	This submission item relates to the application of performance standards to existing buildings. The Submitter would have concerns is the exemption offered under proposed Rule 15.5.2.X was to be removed as a consequence of the PC1 submission process. The Submitter supports proposed Rule 15.5.2.X and seeks that this provision is retained in the decision for PC1.

PC1 ID:	Trans1
Provision Name:	Rule 6.6.3.2.c Rule 6.6.3.2.d Rule 6.6.3.2.e Rule 6.6.3.4.c Figure 6B.13 Figure 6B.17
This submission seeks:	Accept the change with amendments outlined below.
Reasons:	This submission item relates to the proposed adjustments to the minimum sight distance provisions. The Submitter seeks retention of the exemption provided under the existing Rule 6.6.3.2.c: <i>“Except, where a site is unable to conform with the minimum sight distances in rules 6.6.3.2.a and 6.6.3.2.b, one vehicle crossing per site is allowed in the position which most nearly complies with rules 6.6.3.4.a or 6.6.3.4.b (minimum distances of new vehicle crossing from intersections).”</i> The existing Rule 6.6.3.2.c serves an important function of protecting the entitlements of existing properties that are unable to comply with the sight distance provisions.

	<p>The Submitter seeks retention of the exemption provided under the existing Rule 6.6.3.4.c:</p> <p><i>“Except, one vehicle crossing only may be constructed to provide for access to the site, in the position that most nearly complies with rules 6.6.3.4.a or 6.6.3.4.b.”</i></p> <p>The existing Rule 6.6.3.4.c serves an important function of protecting the entitlements of existing properties that are unable to comply with the sight distance provisions.</p> <p>Where new subdivision is proposed, the Submitter accepts that the sight distance provisions should be applied, so as to require any proposed new sites that breach the sight line standards to obtain consent as a restricted discretionary activity. Accordingly, retention of the existing Rule 6.6.3.2.c and Rule 6.6.3.4.c could occur on the basis that these exemptions only apply to existing sites.</p> <p>The Submitter is satisfied that the other changes proposed by Trans1 are acceptable.</p>
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I wish to speak in support of this submission at a hearing. If others make a similar submission, I will consider presenting a joint case at a hearing.

I trust that the above submission is helpful. I look forward to hearing from Dunedin City Council in due course.

Yours faithfully
PATERSONS



Kurt Bowen
Registered Professional Surveyor
17/12/2024