

289-299 Castle Street, Dunedin – Preens Dry Cleaners Ltd

SUBMISSION TO THE DRAFT DUNEDIN FUTURE DEVELOPMENT STRATEGY 2024-2025

TO: FDS Hearings Panel
Dunedin City Council
PO Box 5045
Dunedin 9054

BY ONLINE FORM: <https://www.dunedin.govt.nz/do-it-online/have-your-say/draft-fds-submission-form>

SUBMISSION ON: Submission on Draft Dunedin Future Development Strategy 2024-2025

SUBMISSION SEEKS: Submission on Inner City Residential Infrastructure Upgrades

NAME OF SUBMITTER: Preens Dry Cleaners Ltd

SPEAK: Wishes to speak in support

ADDRESS FOR SERVICE: Preens Dry Cleaners Ltd
C/- SLR Consulting New Zealand Limited
77 Stuart Street, Level 1
Dunedin 9016

Attention: Chris Pearse-Smith

PHONE: 027 712 3934

1.0 INTRODUCTION

- 1.1 Preens Dry Cleaners Limited wishes to provide feedback and recommendations on the Draft Dunedin Future Development Strategy with respect to the identified infrastructure upgrades, particularly with respect to Wastewater. A detailed summary of the context and background is provided below to outline the reasoning for this feedback.
- 1.2 Preens Dry Cleaners Limited owns the properties at 289 and 299 Castle Street, Dunedin which comprises a combined land area of approximately 474m². The sites are legally described as Lot 1 Deposited Plan 7624 (Record of Title OT366/73); Part Section 19 Block XXII Town of Dunedin (Record of Title OT284/223).
- 1.3 The site is located within the Inner City Residential Zone under the Proposed 2GP and adjoins the Campus Zone to the west. The site is within close proximity of the existing Dunedin Hospital and is located on the edge of the University Campus as well as along State Highway 1.

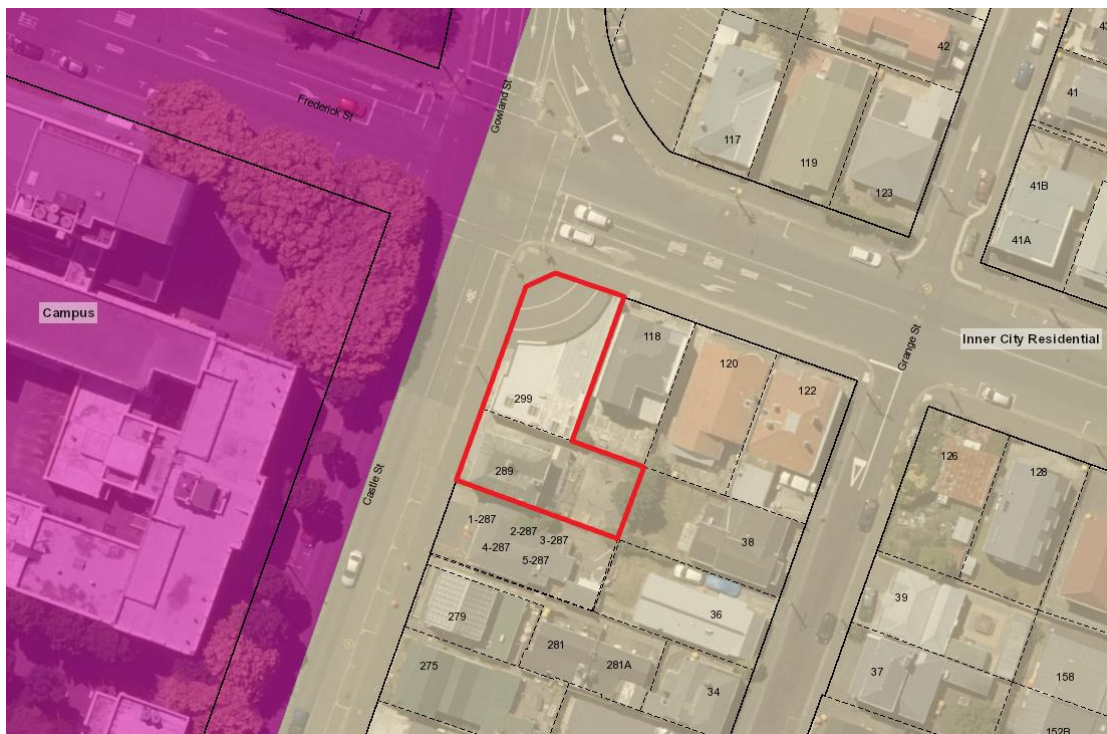


Figure 1: Site Location and Zoning on Proposed 2GP Planning Maps

- 1.4 This site currently contains one building at 299 Castle Street which operates as a Preens Dry Cleaning business while 289 Castle Street remains as a vacant site. In October 2021, resource consent was lodged with the Dunedin City Council to undertake a multi-unit development and subdivision for the construction of 14 residential apartments within one building complex.
- 1.5 The resource consent application was looked upon favourably by Council's Planning team and Waka Kotahi (NZTA) have provided their written approval. The application has however remained on hold as Council's 3-Waters Department opposed the proposal.
- 1.6 The reason for the proposal relates to the density of residential development proposed. For context, Rule 15.5.2.1(e) states provides for residential activity at a density of 1 habitable room per 45m² of site (in this regard, the site permits just over 10.5 habitable rooms (or 11 rooms rounded up). Furthermore, Rule 15.5.2.5(d) provides for residential activity at a density of up to 1 habitable room per 30m² which provides for 15.8 (or 16 rooms rounded up) as a restricted discretionary activity. Overall, 14 total habitable rooms were proposed as part of this proposal.

- 1.7 Council's 3-Waters Department opposed the proposal as they noted that the density of development was too great in relation to the condition of Council's existing wastewater infrastructure. Again, to provide context, the permitted number of habitable rooms is 11 or otherwise the number of habitable rooms anticipated by the 2GP under Rule 15.5.2.5(d) is 16. The resource consent application has therefore been suspended by Council due to the applicant seeking 14 habitable rooms (three above the permitted threshold, and two under the anticipated threshold).
- 1.8 The reasoning for 3-Waters opposition was that the existing wastewater infrastructure within the nearby wastewater network is old and in disrepair and is unable to function during high rainfall events due to the system flooding. It is understood that this failing wastewater infrastructure is not actually directly within Castle Street, but rather further down on Anzac Avenue. A number of suggestions and potential solutions were put forward in response to 3-Waters which included undertaking hydraulic modelling to understand the impact of an additional three bedrooms beyond the permitted baseline, as well as offering methods for on-site wastewater attenuation (areas in which Preens Dry Cleaners are experienced in dealing with) which would allow for a slow release into the system and appropriately respond during high rainfall events. Latest technology low flow water fixtures were also volunteered. 3-Waters was reluctant to accept any of these options.

2.0 Comments on the Draft Dunedin Future Development Strategy (FDS)

- 2.1 The FDS provides details of future wastewater network infrastructure upgrades across the city and details that these works will be advanced via the Long Term Plan.
- 2.2 Section 6.3.1.5 sets out the following summary in relation to wastewater network constraints across Dunedin:

There are significant constraints across the city's wastewater network. These are caused primarily by stormwater and groundwater getting into the wastewater network when it rains (called 'inflow and infiltration') due to older, damaged pipes and connections. This becomes a particular problem during large rainfall events. During these events, the wastewater network become overloaded – to relieve pressure and prevent wastewater spilling within dwellings, contaminated water is discharged into water bodies and occasionally exits manholes and spills onto the street. The DCC is working towards reducing the frequency and volume of wastewater overflows. Additional development can both increase stormwater flows (due to an increase in impermeable surfaces) and add more wastewater into the system. As we replace pipes to address these system failures, we are also providing additional capacity to support the growth anticipated for the affected areas. However, as the issues are catchment-wide, they will not be resolved until the entire programme of works is complete for each catchment, meaning we cannot provide for additional urban development beyond that provided for in the 2GP until works are complete. Resolving these constraints will depend on funding, programming and contractor availability and will vary by catchment area.

Some of Dunedin's existing medium density areas are subject to 3 waters (particularly wastewater) constraints that mean they cannot currently be developed to their full capacity. Infrastructure upgrades needed to remove these constraints are identified in sections 6.7 and 6.8.

- 2.3 As per the above, the FDS identifies that there are number of wastewater infrastructure issues, and it also notes throughout the document that medium density housing areas have been identified with a 'wastewater constraint mapped area'. It is noted that the sites owned by Preens Dry Cleaners Ltd at 289 and 299 Castle Street are not subject to this overlay.

2.4 Section 6.7.3.2 identifies the key areas where wastewater network upgrades to address wastewater constraints are programmed or underway. These areas include:

- *Kaikorai Valley – expected completion 2028*
- *Corstorphine – expected completion 2028*
- *Andersons Bay – 2028 – 2038*
- *North East Valley – 2033-2038*
- *South Dunedin – expected completion 2038.*

2.5 Details for Mosgiel wastewater infrastructure upgrades are also discussed in Section 6.8.3.1.

2.6 The FDS does not provide any commentary or detail of any proposed upgrades to Inner City Residential Zones that appear to be subject to these same constraints and does not identify any intentions or timeframes to upgrade wastewater infrastructure such as the wastewater network in Anzac Avenue which was significantly impacting development opportunities on Castle Street.

3.0 SUBMISSIONS

RELIEF SOUGHT

3.1 Preens Dry Cleaning Ltd requests that existing medium density residential areas are prioritised for wastewater infrastructure upgrades prior to future medium density residential zones. The reasons for this relief sought is outlined below.

3.2 Areas that have been identified for higher density residential and are not subject to infrastructure constrained mapped areas should be adequately serviced. In the case of 289-299 Castle Street the Proposed 2GP specifically provides for higher density residential (beyond the permitted density) as a restricted discretionary activity. It is unhelpful that applicant's applying for resource consent under this rule are being opposed by 3-Waters when no known infrastructure constrained mapped areas have been included. This can have significant financial implications for developers who are unable to obtain consent through a restricted discretionary pathway.

3.3 Council is actively encouraging medium density residential infill across multiple residential zones to meet housing targets. This has most recently been identified via Variation 2 to the Proposed 2GP.

3.4 The site is located within 150m of the Dunedin Hospital and is located on the fringe of the Campus Zone along a State Highway and does not have adequate wastewater infrastructure. It is Preens Dry Cleaning Ltd's view that an area in this location should not be subject to such significant infrastructure constraints, particularly within proximity of the new Dunedin Hospital development.

4.0 CONCLUSION

4.1 Preens Dry Cleaning Ltd request that existing medium density residential areas are prioritised for wastewater infrastructure upgrades prior to future medium density residential zones.

4.3 Preens Dry Cleaning Ltd wish to be heard in support of this submission.

4.4. If others make a similar submission Preens Dry Cleaning Ltd would consider presenting a joint case with them at any hearing.

4.5 Preens Dry Cleaning Ltd cannot gain an advantage in trade competition through this submission.

**Signature on behalf of
Preens Dry Cleaners Ltd:**



Chris Pearse-Smith
Senior Planning and Policy Consultant
SLR Consulting New Zealand Limited

Date: 28 February 2024

Address for Service: Preens Dry Cleaning Ltd

C/- SLR Consulting New Zealand Limited
77 Stuart Street, Level 1
Dunedin 9016

Attention: Chris Pearse-Smith

Phone: 027 712 3934

E-mail: chris.pearse-smith@slrconsulting.com