

THIS 4 NOVEMBER 2021

BEFORE THE 2GP HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

The Second Generation Dunedin City District Plan (2GP)

**HEARING 2 TOPIC: VARIATION 2, ADDITIONAL HOUSING CAPACITY –
INTENSIFICATION ZONING**

UNDER Clause 6 of First Schedule, of the Resource Management Act 1991

STATEMENT OF BARRY JAMES DOUGLAS

Dunedin Resident, of 14 Jubilee Street, Belleknowes, Dunedin, 9011

PROPOSED CHANGE IN05: Rezoning from GR1 to GR2 – Mornington (North)
(being the area identified in Appendix 10 (p.22) 2GP Map Amendments).

1. INTRODUCTION

My name is Barry James Douglas. I am a long time Dunedin resident, residing on the eastern slope of Hawthorn Hill, in the Mornington -Belleknowes suburb. I have previously provided a written submission on this 2GP Variation 2 matter, dated 3 March 2021.

My Submission and this Statement primarily relates to the Mornington zone change from General Residential 1 to General Residential 2 (Proposed change IN05), more specifically, regarding the detrimental impact the policies and rules associated with this change could have on the built environment and residents.

While my comments primarily relate to the Mornington rezoning proposal, they are also generally applicable to other rezoning changes, IN06 – Roslyn (south); IN08 – Roslyn (north); and IN09 – Maori Hill. These areas all share a similar topographic aspect, generally (though not exclusively), sloping eastward (toward the harbour), between the Kenmure – Highgate ridgeline and the Town Belt.

My written submission (March 2021), accepted in part the proposed rezoning Change IN05, but notably requested the following significant amendment – to exclude the northern area of this zone, being the suburb more generally identified as Belleknowes as bounded to the south by Hawthorn Avenue and to the west by Kenmure Road. Alternatively, my concerns could be satisfied by planning policies and rules that mitigate the detrimental effects from new infill builds on the existing built environment.

2. CHARACTER AND AMENITY VALUES OF MORNINGTON NORTH – (BELLEKNOWES)

- 2.1 The built environment of Belleknowes is generally of a higher quality housing stock and the newer replacement housing is similarly of higher quality. Many of the older (heritage) homes in Belleknowes have been significantly restored to include warmer home provisions.
- 2.2 Gardens, mature trees, hedges, shrubs and tree lined streets are valued and common through the suburb and provide a welcome roost and source of food for birds, particularly native species (tui, bell birds, kereru and NZ fantail) venturing from the nearby Town Belt. Many of the streets are tree lined.
- 2.3 This is a peaceful suburb, close to the inner City where spatial privacy, afforded by site size, sunshine and often uninterrupted views of the City are highly valued. These amenity values of the natural environment, as preserved by the present 500m² minimum section site size, will be placed under pressure, and for some unfortunate residents, will, to various degrees, diminish from the overshadowing effects of additional housing units on smaller lots.
- 2.4 It is desirable suburbs like Belleknowes and those suburbs to the north immediately above the Town Belt, that contribute to make Dunedin a special place to live.
- 2.5 The proposed DCC planning led change to increase the density of housing infills on smaller lots (minimum 300m²) in this suburb and those further north in Roslyn and Maori Hill is (in my opinion), tampering with the vision and values of Dunedin's earlier planners and will not have the blessing of many ratepayers in this area!

3. CONCERNING EFFECTS OF THE PROPOSED INTENSIFICATION REZONING CHANGES FOR MORNINGTON NORTH.

- 3.1 The proposed 2GP Plan Variation 2 to enable additional housing encourages the highest development densities in the most accessible locations, being in the central city and suburban centre zones that include the proposed rezoning areas IN05, IN06, IN08, IN09 (Mornington to Maori Hill (Policy 2.2.2.4c; Variation 2 Proposed Plan Amendments, February 2021).
- 3.2 The existing operative plan allows for smaller non-complying site sizes within the Mornington – Belleknowes area through resource consent approval after correctly

considering the opinions of deemed affected neighbouring parties. In my opinion, there is no need for change.

- 3.3 The rezoning of this area to General Residential 2 and the implementation of change to a reduced minimum site size (amending Rule 15.7.4) and density (amending Rule 15.5.2) will, in many cases, negate the opportunity of neighbouring affected parties to voice their concerns to Council on a significant matter that might detrimentally affect the environmental amenity values they presently enjoy on their property. The right of deemed affected parties to be heard before a planning committee on important fundamental matters such as noncompliant lot size issues is embedded in the RMA consenting process. That process is negated in the 2GP Plan by the proposed rezoning from GR1 to GR2 that provides for compliant minimum site areas of 300m² where subdivision applies. There is no right of redress from affected parties. This is a position that disenfranchises property owners from voicing their concerns.
- 3.4 The benefits of rezoning Mornington (north) (IN05) are summarized in the DCC Variation 2 Section 32 Report (p.170, February 2021), but there is limited identification of the detrimental effects that housing intensification will have on existing residential living and amenity standards and environmental values that make Mornington (north), Roslyn and Maori Hill desirable residential suburbs. My concerns follow in sections 3.5 – 3.13.
- 3.5 The overshadowing effects of new infill housing builds under new height to boundary controls on smaller lot sizes will, to varying degrees, impact on the immediate neighbouring dwelling and yards limiting solar access. Already, low winter sun reduces hours of direct solar access and the benefits of the sun to heat buildings in much of this area. This is more particularly so for homes located on lower eastern slopes and gully areas without a northerly aspect, and on those other properties with very limited solar access during the coldest winter months due to overshadowing effects from existing buildings and trees. For those homes, housing intensification will compound those solar access limitations during winter months, impacting on home energy requirements, natural light, and the well-being of affected occupants. The loss or reduction of natural ventilation (air flow) causing damp – wet surfaces, both on the ground and on buildings will occur in some situations where infill builds are located close to boundaries and existing homes.
- 3.6 No specific detail is given to the effects on the existing housing properties of the

bulk, height, location standards for General Residential 2 infill housing on the new allotments (as diagrammatically identified Figure 15 6F-2; GP2 District Plan). The conditions provide for inbuilt house development up to 1m from the property boundary, and objectives and rules for new site design that encourage maximising solar access, enhance environmental performance and energy resilience as outlined in Objective 2.2.2 (2GP Proposed Plan Amendments – February 2021). However, there is little, if any, consideration of the overshadowing effects of new house builds on the existing housing stock, and there is no opportunity for redress by the detrimentally affected party. Alarming, it would seem these concerns will be magnified under the policy proposals in the 'Enabling Neighbouring Housing Supply Amendment' to the RMA, where new housing builds up to 3 levels and supplementary tiny homes are permitted without resource consent.

- 3.7 The loss of usable and sunny garden or yard space for outdoor living and gardens, for interaction with neighbours and outdoor privacy due to overshadowing building effects.
- 3.8 The loss of trees, and green yard spaces that are the habitat of birds that regularly feed and roost, including the many native species that daily venture from the adjacent town belt. How will council plan to appropriately mitigate for the loss of mature trees and vegetation and maintain an existing neighbourhood green streetscape character? Relief may be in Council's recent (October 2021) announcement to consider introducing rules to mandate planting of native trees to compensate the loss of green space related to housing intensification.
- 3.9 The loss of local heritage identity values. All suburbs of the City have their own heritage identity values and characteristics. They may be buildings or sites; these are valued by historians and local residents, although I expect often not well known to Council staff. For example, my own residential block bounded between Kenmure Road and Jubilee Street is the site of George Matthew's Hawthorn Hill nursery that for many years from the mid-1850's provided trees and shrubs for the city. His house built, about 1870, still stands on Hawthorn Hill. Nearby, in the same block, is the gracious large villa built for the then mayor of Mornington, Mr. Herbert Le Cren. It is still standing in full splendor, set in an expansive landscaped garden (within the Matthew's nursery area). Adjacent to that property is the grand Mornington Manor House (built 1898) on the corner of Hawthorn Avenue and Jubilee Street, where Captain Scott dined in 1912 before setting sail the next day in the Terra Nova for the South Pole. I believe Council have a role to manage and protect at the very least, the visual heritage amenity values of neighbourhoods

subject to housing intensification. It is my hope that this panel will follow up on the recommendation of Dr Andrea Farminer, DCC Heritage Advisor (in the Section 32 Part 1 Report, 22 August 2021, Section 4.1.6) to consider “--- a rule requiring resource consent for the demolition of buildings older than a specified age.” The suggestion, (in that Section 32 Report), to at least undertake targeted detailed assessments on specific buildings to enable protection of heritage values prior to otherwise inappropriate subdivision and development, is a sensible approach.

- 3.10 It is the built heritage homes, their link to the history of the neighbourhood, their open yards, trees, gardens and green spaces, and wildlife that contribute to make the elements of Mornington (north), Roslyn and Maori Hill the desirable residential environment for residents and visitors to appreciate and enjoy. It is likewise the health and well-being of these suburbs, their place within the visual streetscape of the city, nestled above the town belt that appeal and contribute to the wider city landscape and aesthetic appreciation of the city for residents and visitors to enjoy.
- 3.11 Housing intensification will further impact on parking and road transport issues that already affect residential amenity values due to an increase in traffic noise, and issues of road safety for other users and pedestrians. In addition to the arterial routes through Mornington, namely Mailer Street, Hawthorn Avenue, Kenmure Road, the short-cut route Hawthorne Avenue – Jubilee Street – Napier Street – Stone Street is a preferred busy and at times very noisy, heavy traffic route, linking the City to industrial sites in Kaikorai Valley. Jubilee Street is comparatively narrow, with parking limited to one side. Although desirable, Council rules no longer include onsite residential parking requirements. Housing intensification resulting from Change IN05, will, in the vicinity of this busy route, impact further on road safety and the already localized street parking shortage, mostly resulting from casual visitor parking.
- 3.12 The loss of green spaces and reduction of permeable ground space from additional housing capacity within a residential zone identified for Mornington as a stormwater constraint area (Appendix 10, p.22 2GP Map Amendments) may also place further issues with an aging, strained stormwater drainage network.
- 3.13 I believe it is the responsibility of Council to mitigate some of the effects of residential intensification by ensuring that housing density, site coverage, height in relation to boundary and architectural design of infill builds contribute to a

sympathetic development which does not detrimentally affect the well-being and values of neighbouring residents. Where necessary, Council should be proactive to manage off street parking, and streetscape vegetation.

4. ADDRESSING RELEVANT POINTS IN THE COUNCIL REPORTS

- 4.1 The Section 32 Report '*Variation 2 – Additional Housing Capacity*' (section 20.4.20.1, paragraph 906 – 908) identifies the fitness '*benefits*' of the area for additional housing capacity. The mentioned benefits of elevated views to the harbour, positive streetscape, quality housing, and good market desirability are all existing prevailing amenity values, that result from the preserved natural environment and debated development under planning rules that have more generously provided for the views of affected parties to be heard by Council. Personally, I take strong issue with the Section 32 Report claim (section 20.4. 20.1, paragraph 907) that intensification of housing capacity will not overly affect the character of the area. I have little confidence that Council recommended guidelines will "*ensure new housing respects the build form and scale of existing development*". I am of the view that infill housing development will, in many instances, detract on the existing heritage values, and impact negatively on the well-being of neighbours cast into shadowy gloom during winter months.
- 4.2 The DCC Section 32 Report (section 20.4.20, paragraph 903), estimates the rezoning of Mornington North will provide additional development potential for approximately 25 dwellings. Potential development of a large section directly near to my residence in, Belleknowes, could, by the demolition of the existing large, beautiful, historic character residence, under the proposed rules provide for up to 6 – 10 units. Given this situation, I think the scope for additional housing from rezoning of the area may be significantly higher than the 25 dwellings estimated in the Section 32 Report.
- 4.3 The summary of "*Assessment Criteria*" identified in the DCC Variation 2 Section 32 Report – Appendices; p.67 (February 2021), identifies for Mornington North, the solar access aspect as "*good*", being generally east facing. I take issue with that DCC planning assessment. No mention is made to the real detrimental overshadowing effects housing intensification can have on limiting solar access to

the existing built environment.

- 4.4 There is little, if any, consideration in the rezoning proposal of the overshadowing effects of new house builds on the existing housing stock, and no opportunity for redress by the detrimentally affected party.
- 4.5 The evidence of the DCC Urban Design Officer in the Section 42A Report (Part 2a Intensification Zoning) p.52 makes the point in addressing my submission that “--
- There has been a reasonable amount of historic subdivision and redevelopment without appearing to impact on the suburb’s character.” I generally agree with that comment, but significantly, that historic subdivision occurred under the present Residential Zone I rules that provided for a larger section footprint than provided for in this 2GP zoning plan variation, and under a resource consenting process that enabled deemed affected persons to be heard. The Urban Design officer further suggests the built architectural design character could, if necessary, be preserved by rules. I support that suggestion, but again, looking forward, I am concerned that what is being proposed to enable greater housing intensification will, in time, have a radically different effect on the built character, heritage values and green amenity spaces both private and public within our suburbs. In that respect, I am also partially foreseeing the downstream consequences of the more radical proposed legislation in the *‘Enabling Neighbouring Housing Supply Bill’* that could (and probably will) at some stage apply to Dunedin, if it can demonstrate it is needed. Now is the time, before that Bill takes effect, to voice concerns about the effects of housing intensification, the associated changes to the natural and built environment, and the implications for our established amenities, our built heritage, our infrastructure services and our general well-being.