

18 December 2024

Dunedin City Council

Via email: districtplansubmissions@dcc.govt.nz

Submission on Dunedin City 2GP Plan Change 1

Business South welcomes the opportunity to submit the business community's view on the Dunedin City Second Generation District Plan (2GP), Plan Change 1 – Minor Improvements.

Business South represents over 1,300 businesses across the region and appreciates the opportunity to submit on Plan Change 1 of the Dunedin City Second Generation District Plan (2GP). The proposed changes impact heritage buildings and urban development, which are crucial to Dunedin's character but also pose economic and practical challenges for property owners, developers, tenants and businesses.

1. **Heritage Building Protection:**

1.1. Balancing Heritage Protection with Economic Realities

While we support heritage protection, there must be a balance that avoids excessive financial and compliance burdens, which risk creating underutilised, unattractive buildings.

1.2. Practical Approaches to Heritage Management

Solutions such as retaining facades while modernising interiors should be encouraged to preserve heritage without stifling development or restricting usability.

1.3. Clarity and Transparency

The council must clarify heritage assessment criteria and provide transparency in decision-making. The subjective nature of current processes creates uncertainty for property owners.

1.4. Resource Consent Process

Simplifying and streamlining the resource consent process is essential to encourage appropriate redevelopment while maintaining heritage features.

1.5. Seismic Strengthening and Financial Support

Seismic strengthening and maintenance costs are prohibitive. Financial incentives, compensation, or toolkits should be made available to property owners to ensure buildings remain viable and fit for purpose.

2. **Live Music and Acoustic Insulation**

2.1. Impact on Businesses:

While this change is positive for live music venues and entertainment businesses, it introduces additional costs for developers and property owners involved in inner-city residential projects. These costs may discourage investment in central city housing, affecting urban revitalisation goals.

2.2. Business Recommendations:

2.2.1. Shared Responsibility for Noise Management:

- o Advocate for a balanced approach where both live music venues and residential developers share the responsibility for managing noise impacts.

- Recommend that existing live music venues are provided legal protections (e.g., through a “right-to-operate” framework) where appropriate acoustic measures have been taken.

2.2.2. Cost Mitigation for Developers:

- Propose council incentives or support (e.g., grants, waivers of consent fees) to help offset the additional costs of acoustic insulation for developers of inner-city residential projects.
- Encourage clear, standardised acoustic requirements to provide certainty for developers during planning stages.

2.2.3. Collaboration Between Stakeholders:

- Suggest the formation of a working group including live music venues, property developers, council representatives, and community stakeholders to ensure acoustic standards meet the needs of all parties.
- Promote tailored noise management plans for new developments near entertainment precincts, balancing residential comfort and business sustainability.

3. **Feedback from members:**

Business South’s members have provided the following feedback specifically related to owning, renovating and maintaining heritage buildings:

- Economics of conservation – a full conservation management plan is costly, not practical and resulting in buildings sitting there longer.
- Costs to do upgrades are prohibitive.
- Non-commercially viable businesses are in buildings where the building is not fit for purpose.
- If council want to retain a building, then they need to compensate the owner.
- The degree of subjectivity on how buildings are categorised as a heritage.
- The number of buildings added to the proposed Plan Change 1 are not category-listed with NZ Heritage. What criteria is used to determine their placement?
- Emphasise the need for a practical approach to balancing heritage protection and commercial viability of buildings.
- Highlight concerns around the financial burden of compliance, strengthening, and heritage classification for building owners and developers.
- Suggest clarity and transparency in how buildings are assessed and categorised as heritage assets.
- Recommend council compensation or incentives for property owners required to maintain or upgrade heritage buildings.
- Encourage solutions such as retaining building facades while allowing flexibility for redevelopment or extensions.
- Address the risk of creating underutilised buildings that deter businesses and tenants due to excessive restrictions.
- Call for simplification of the resource consent process to support modernised heritage buildings and ensure changes (e.g., shop fronts) remain practical.
- Stress the importance of ensuring that heritage regulations do not add unnecessary bureaucracy or barriers to development.
- Advocate for ongoing collaboration between the council and business community to find workable solutions for heritage preservation and economic growth.

4. **Conclusion**

Business South encourages the council to work collaboratively with the business community to balance heritage preservation and alterations to live music and insulations requirements with economic growth, ensuring Dunedin remains vibrant, liveable, and commercially attractive.

Contact for Further Information

For further information, contact the Chief Executive Officer, Mike Collins, 03 479 0181.

Regards

Mike Collins

