

Roxanne Davies

From: Andrew Robinson <Andrew.Robinson@ppgroup.co.nz>
Sent: Thursday, 4 March 2021 01:22 p.m.
To: District Plan Submissions
Subject: Midas Ltd
Attachments: Mornington Road supporting information.docx; Midas Ltd - Submission Form.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Roxy

Hi,

Please find attached, a submission from Midas Ltd regarding 179-183 Mornington Road. They could not gain a trade advantage as a result of this submission. They would like to speak at a hearing and they would consider a joint submission.

Thanks, Andrew

VARIATION 2 – ADDITIONAL HOUSING CAPACITY

SUBMISSION FORM 5



CLAUSE 6 OF FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

This is a submission on Variation 2 to the Second Generation Dunedin City District Plan (2GP). Your submission must be lodged with the Dunedin City Council by midnight on 4 March 2021. **All parts of the form must be completed.**

Privacy

Please note that submissions are public. Your name, organisation, contact details and submission will be included in papers that are available to the media and the public, including publication on the DCC website, and will be used for processes associated with Variation 2. This information may also be used for statistical and reporting purposes. If you would like a copy of the personal information we hold about you, or to have the information corrected, please contact us at dcc@dcc.govt.nz or 03 477 4000.

Make your submission

Online: www.dunedin.govt.nz/2GP-variation-2 | **Email:** districtplansubmissions@dcc.govt.nz

Post to: Submission on Variation 2, Dunedin City Council, PO Box 5045, Dunedin 9054

Deliver to: Customer Services Agency, Dunedin City Council, Ground Floor, 50 The Octagon, Dunedin

Submitter details (You must supply a postal and/or electronic address for service)

First name: Midas Limited

Last name: Midas Limited

Organisation (if applicable):

Contact person/agent (if different to submitter): C/- Paterson Pitts Group

Postal address for service: PO Box 5933 Moray Place

Suburb:

City/town: Dunedin

Postcode: 9058

Email address: Vyvienne.Evans@ppgroup.co.nz

Trade competition

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

I could gain an advantage in trade competition through this submission: ☐ Yes ☐ No

If you answered yes, you could gain an advantage in trade competition through this submission, please select an answer:

☐ Yes ☐ No

My submission relates to an effect that I am directly affected by and that:

a. adversely affects the environment; and

b. does not relate to trade competition or the effects of trade competition.

Submission

Submissions on Variation 2 can only be made on the provisions or mapping which are proposed to change, or alternatives that are clearly within the scope of the 'purpose of the proposals', as stated in the Section 32 report. Submissions on other aspects of the 2GP are not allowed as part of this process.

You must indicate which parts of the variation your submission relates to. You can do this by either:

- making a submission on the Variation Change ID (in which case we will treat your submission as applying to all changes related to that change topic or alternatives within the scope of the purpose of that proposal); **or**
- on specific provisions that are being amended.

The specific aspects of Variation 2 that my submission relates to are:

Variation 2 change ID (please see accompanying Variation 2 – Summary of Changes document or find the list on www.dunedin.govt.nz/2GP-variation-2)

A1, A2, A3, B1, B3, B4, B6, E9, A1-Alt1, A2-Alt3 and a change with no ID as of yet.

For example: D2

Provision name and number, or address and map layer name (where submitting on a specific proposed amendment):

As relate to the above Change IDs, and the mapped area at 179 and 183 Mornington Rd.

For example: Rule 15.5.2 Density or zoning of 123 street name.

My submission seeks the following decision from the Council: (Please give precise details, such as what you would like us to retain or remove, or suggest amended wording.)

- ☐ Accept the change
- ☒ Accept the change with amendments outlined below
- ☐ Reject the change
- ☐ If the change is not rejected, amend as outlined below

Accept all of the changes proposed by the following Change ID's: A1, A2, A3, B1, B3, B4, B6, E9.

Accept Council's proposal to reject the following Change ID's: A1-Alt1, A2-Alt3.

Amend the 2GP maps so that the Urban Biodiversity Mapped Area (UBMA) encompassing 179 and 183 Mornington Rd follows the extent of the existing forest cover on these sites.

Reasons for my views (you may attach supporting documents):

If you wish to make multiple submissions, you can use the submission table on page 3 or attach additional pages.

We believe that the proposed changes to the minimum size, density and family flats standards will be effective in addressing the projected shortfall in Dunedin's residential development capacity over the short and medium term.

Regarding the UBMA at 179 and 183 Mornington Rd, these sites have some forest cover where they border Caversham Valley Forest Reserve. The reserve is the area of this UBMA with the highest biodiversity values; under its exotic canopy secondary growth māhoe (whiteywood) and remnant kōtukutuku (tree fuchsia) are thriving, and it is home to a population of the endemic velvet worm (*Peripatus* species). However, most of 179 and 184 Mornington Rd lack any forest cover, and their unforested area is unlikely to hold any biodiversity values. Furthermore, the UBMA in its current form reduces the feasibility of residential development on these sites, as resource consent will be required even if

Hearings

Do you wish to speak in support of your submission at a hearing: ☐ Yes ☐ No

If others make a similar submission, would you consider presenting a joint case at a hearing: ☐ Yes ☐ No

Signature:

Date:

Multiple Submissions Table

Variation 2 change ID or provision name and number or address and map layer name	Decision Sought a. Accept the change b. Accept the change with amendments outlined c. Reject the change d. If the change is not rejected, amend as outlined	Reasons for my views

Residential Density Policy Provisions

The submitter is supportive of all of the proposed residential policy changes, including an increase to density of the GR1 zone, the provision for duplexes, and the replacement of family flats with ancillary residential units. This support does not extend to NDMA and infrastructure matters, as discussed later in this submission.

The submitter has several suggestions-

1. There should be a requirement that subdivision of duplex developments can only be completed once the new units have been constructed. This will avoid subdivisions being undertaken on empty land, and owners then attempting to seek consent for stand-alone houses on the subsequent sites (which may be as small as 200m²). The submitter suggests that there is a provision inserted into Variation 2 that requires the framing of both duplex units to be complete before the s224c certificate can be issued for an associated subdivision.
2. Duplex developments should be enabled through a suitable planning provision to share foul and stormwater drains (e.g. a drain in common). Without this provision it may be difficult to obtain a building consent for the duplex unit construction (in a duplex pair) while the site is still a single site (i.e. prior to the subdivision being completed). A drain in common between two duplex units is consistent with certain types of subdivision (e.g. Unit Title) and has the benefit of reducing house construction costs. Christchurch City Council allows shared drains for up to 4 residential units, and this seems to operate reasonably well.

The submitter also supports the decision to reject the A1-Alt1, A2-Alt1, A2-Alt2 and A2-Alt3.