

Submission on plan change DIS-2021-1 (Variation 2)

Thank you for the opportunity to submit on this plan change.

Well balanced plan changes promoting increased residential density in a targeted way are to be welcomed where they are integrated with complementary amendments to heritage provisions. More affordable housing is of course needed.

In recent decades the City hasn't done too badly, and has sometimes done very well, in recognising the value of its central city built heritage, and in developing supporting policy. Attention to residential and suburban heritage has been neglectful by comparison. The focus on the central city has reflected, among many other things, a recognition of development pressures there. In introducing additional pressures on heritage in the inner suburbs, similar focussing is needed. Without further amendment, the 2GP plan provides little beyond the slightest provisions for built heritage in these areas.

In the last Ted McCoy lecture, internationally respected heritage architect Jeremy Salmond noted that Dunedin has a lot of heritage buildings, but its planning controls seem relatively weak. With a relatively laissez-faire approach there is a risk that some of the best individual and collective examples will be lost where poorer ones might have taken their place.

The 2GP list of scheduled heritage buildings (Appendix A1.1) contains 303 listings that include standalone residential houses, with a further 52 listings for terrace houses or dwellings within terraces. A breakdown highlights the relative neglect of suburban heritage.

In suburban Dunedin (excluding Port Chalmers), only 41 houses are listed as scheduled heritage buildings, and there is only one residential heritage precinct (the Windle Settlement, Belleknowes), with no other heritage overlays.

Area	Standalone houses listed as scheduled heritage buildings	Includes residential heritage precinct/s
Central City (including City Rise and North Dunedin)	214	Yes
Port Chalmers	20	No
Roslyn	11	No
South Dunedin	8	No
St Leonards	5	No
Mornington and Belleknowes	4	Yes
Caversham	3	No
Wakari	3	No
Mosgiel	3	No
Musselburgh	2	No

Kaikorai Valley	1	No
Maori Hill	1	No
North East Valley	0	No
Andersons Bay	0	No
St Kilda	0	No
Other Dunedin suburbs	0	No
Outlying and semi-rural	28	No

It is noteworthy by way of comparison that Wellington City has greater suburban heritage recognition through precincts and overlays. This is not only in its existing form but in its proposed [reduced form](#).

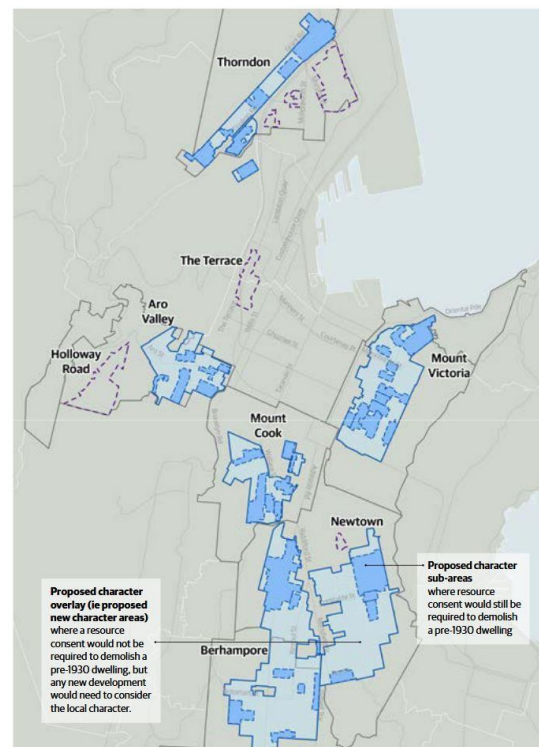
Character areas

Continue to recognise the special characteristics of the broader area and enable opportunities for sensitive, denser development, by:

- Re-focussing pre-1930 character controls to designated sub-areas that exhibit a cohesive streetscape character.
- Adjustment to the boundaries of the overall character areas, in which in these areas new developments would still be required to respect the local streetscape.
- Removing pre-1930 demolition controls where streetscape character has been compromised.
- Maximum heights of 3 storeys within the new character sub-areas (similar to current settings).
- Maximum height of 4-6 storeys in areas outside of the character sub-areas, with the opportunity to go higher along the future mass rapid transit route.

Proposed character areas + sub-areas

- Proposed character sub-areas
- Proposed new character areas
- Current pre1930 character areas
- Inner suburb boundaries



The last time the Dunedin City Council actively and explicitly asked for nominations for additions to the scheduled heritage buildings list was in 2004 (it did not through the 2GP process). It does not offer online advice about nominating a place, and the process is opaque. In contrast, Wellington City Council Me Heke Ki Pōneki invites nominations [on its website](#), and [recently actively sought](#) nominations of buildings and sites, including sites of significance to tangata whenua, which all cities in this country need to do more to recognise.

Retaining old buildings is good for sustainability – they can store energy and become carbon reservoirs. Nearly 40 percent all greenhouse gases are produced in the construction, demolition, and operations of buildings. Adaptive reuse, so well applied in the Warehouse Precinct, should be part of the solution to the housing problem.

Council needs to look better at the flow-on effects of its plan change. Reviewing suburban and residential heritage provisions should be part of this, allowing for densification in a way that better targets it to minimise the loss of the best built heritage and sites of cultural significance.

While there can be tension between built heritage and intensification, to view them as necessarily in opposition to each other is a false dichotomy. As one writer recently pointed out 'heritage isn't just an obstacle ... it has a diverse range of benefits to many communities and many more individuals'.

Nāku iti noa, nā,

David Murray
Dunedin
4 March 2021