

29 April 2025
Long Term Plan
Dunedin City Council
50 The Octagon
DUNEDIN

Tēnā koe

SUBMISSION ON DUNEDIN CITY COUNCIL'S 9 YEAR PLAN

1. The Otago Regional Council (ORC) welcomes the opportunity to submit on the Dunedin City Council's (DCC) Long Term Plan (LTP).
2. The ORC has a strong interest in the proposed LTP, particularly in areas that align with our Strategic Directions 2024-34.
3. Specifically, the ORC's focus areas of Climate and Transport are relevant in the context of the proposed LTP, and thus, these areas are the focus of this submission.
4. The submission also highlights areas where the LTP intersects with the joint ORC/DCC Dunedin Future Development Strategy.

Support for the DCC's climate ambition

5. In 2022, ORC and others (including DCC) formed the Zero Carbon Alliance because the parties have a shared interest in reducing both organisational and city-wide greenhouse gas emissions, and wish to collaborate on emissions monitoring and reduction initiatives.
6. The ORC remains supportive of the DCC's climate ambitions, as outlined in the Zero Carbon Plan 2030. This includes the target of net zero carbon by 2030 (excluding biogenic methane).
7. Key to achieving this ambitious target is investment in initiatives that will reduce emissions from transportation, stationary energy and waste, being the categories of emissions that DCC has the most direct influence over.
8. DCC's climate-positive work aligns with the ORC's strategic goal that "The carbon footprint of our organisation is reduced in line with our climate change strategy, and we are supporting and collaborating with others to do the same." Improvements that will make active and public transport more accessible to ORC staff and others will contribute to ORC achieving this goal.

Support for climate-positive aspects of the LTP

9. The ORC is supportive of the climate-related projects and programmes in the LTP.
10. This includes a series of commitments with a climate resilience and adaptation focus, such as upgrades to stormwater infrastructure in South Dunedin and Mosgiel to reduce flood risk, and improvements to wastewater management and water supply projects across the city. While these individual projects will build resilience for the communities serviced by this infrastructure in the face of predicted increases in both the incidence of drought and increasing frequency and intensity of wet weather events, ongoing investment (including any/all of the following as appropriate; network reviews, maintenance, upgrades) in the city's wider water supply and wastewater infrastructure

servicing both smaller and larger communities needs to remain a priority to ensure good and equitable outcomes for Dunedin's communities.

11. Improved management of stormwater inflows into the network, future proofing the stormwater network against the effects of climate change, and assessment of wastewater capacity (and overflows) under future scenarios, will likely have benefits for the environment, mana whenua and community.
12. The ORC welcomes the long-term commitment to the South Dunedin Future Programme, which is a joint programme between the DCC and ORC and is pleased to see this programme included as a Level of Service through to the delivery of a climate change adaptation plan for South Dunedin in years 3-9.
13. It is also pleasing that a climate resilience framework will be developed for the city. The process of developing the framework and the framework itself will facilitate a proactive approach to developing climate challenges across the city. This project includes a city-wide climate change risk assessment and climate change adaptation planning, both of which will inform future collaborations between the DCC and ORC.
14. The ORC welcomes the series of investments that will reduce emissions associated with waste. These include the initial phase of establishing a bioresources facility linked to wastewater processing, improvements to resource recovery facilities, and improving gas capture at the Green Island Landfill. These investments will have environmental benefits through the reduction in the volume of waste disposed at landfills and the promotion of renewable energy generation.
15. There are several investments that will deliver reductions in transport emissions. Funding of the implementation of the DCC Transport Plan includes some active transport works (e.g. some footpath improvements, upgrade to Princes Street) and improving access to public transport through the establishment of a park and ride facility in Mosgiel. The ORC also supports the completion of the Te Awa Ōtākou Peninsula Connection programme (shared cycle and footpath).
16. The ORC welcomes the continued focus on reducing DCC's organisational emissions (LoS targets being 30% reduction relative to 2018/19 baseline by 2026/28 and 42% reduction by 2030/31). This will be achieved by transitioning the DCC vehicle fleet to electric vehicles (reducing transport emissions), and transitioning DCC buildings to clean energy (reducing emissions from stationary energy).
17. The ORC considers that these projects will assist with achieving important objectives in the proposed Otago Regional Policy Statement 2021 and Otago Regional Policy Statement 2019, including:
 - enhancing social and economic resilience to the adverse effects of climate change
 - contributing to minimising the adverse environmental effects of stormwater and wastewater discharges, thereby improving the health, integrity, functioning and resilience of freshwater, estuarine and coastal ecosystems.

Implications of excluding the Climate Investment Package

18. Whilst supportive of the investments noted above, the ORC is concerned that DCC's decision to exclude either of the Climate Investment Packages will compromise progress towards the Zero Carbon Plan and the ORC's Strategic Directions 2024-34.

19. The ORC notes the DCC's admission that the exclusion of the Climate Investment Package could affect DCC's ability to meet its own emissions-reduction targets (both organisational and city-wide). The consultation document states, "While our Zero Carbon targets were always ambitious, it is almost certain that we won't reach our city's 2030 goal without additional investment."
20. In addition to their alignment with the Zero Carbon Plan, several projects included in the Climate Investment Packages also address the Future Development Strategy 2024 (a joint ORC/DCC strategy) and the Ōtepoti Dunedin Pathways Plan.
21. The ORC encourages the DCC to continue making improvements to the active transport network over the period of the LTP, despite the implications of the 2024 Government Policy Statement for transport that no co-funding for new walking and cycling improvements is included in the 2024-2027 National Land Transport Plan.
22. The ORC considers that the projects listed below will contribute meaningfully to the development of a well-functioning urban environment (NPS-UD Policy 1) by enhancing public and active transport options, improving safety, reducing emissions, and fostering more connected, accessible communities.

City to Waterfront bridge

23. The City to Waterfront bridge is a critical project in terms of increasing connection, promoting active transport for short trips and reducing congestion in the city centre.
24. The project would involve constructing a new pedestrian and cycling bridge connecting the central city with the waterfront.
25. Currently the navigation under the Jetty Street overbridge and across the rail lines is hazardous and convoluted, which deters some people from using active transport for their commutes. The bridge would address a key active transport node, linking the central city with the Otago Harbour walking and cycleway.
26. The bridge has been identified in several reports and business cases as being an opportunity that will enhance connection between adjacent and developing parts of the city: the Queen's Gardens area and Steamer Basin.
27. The Future Development Strategy (FDS) 2024 envisages the provision of safe, convenient, and attractive walking and cycling infrastructure to support growth, and access to opportunities as a key aspect of a well-functioning urban environment.
28. The bridge is listed in the FDS as an infrastructure improvement that is required to service existing development capacity and proposed future development areas and support a well-functioning urban environment in the main urban area.
29. ORC's report Te Awa Otakou (2025) on issues and opportunities in the Otago Harbour area identifies waterfront development as a key opportunity. The main issue preventing this development was identified as the lack of access across the highway and railway.
30. The Ōtepoti Pathways Business Case identified the 'City Centre Cluster' (including the City to Waterfront Bridge) as a priority for the city, delivering benefits to health, safety, and travel time.
31. The high emissions reduction potential of this investment, achieved by moving people to active transport, aligns with the DCC Zero Carbon Plan.
32. The bridge would also align with three of ORC's strategic goals:

- a. [Climate] The carbon footprint of our organisation is reduced in line with our climate change strategy, and we are supporting and collaborating with others to do the same.
 - b. [Transport] Active transport is the preferred mode for short journeys in urban areas; and,
 - c. [Transport] Congestion is reduced and connection is increased throughout the region.
33. The ORC acknowledges the funding commitment to this project (part funding in Year 9) but urges DCC to consider funding this critical project in its entirety sooner, given it delivers on many strategies in addition to the Zero Carbon Plan.

Dunedin urban cycleways tunnels trail

34. The LTP signals a reduction of funding for the Dunedin urban cycleways tunnels trail (\$1M in Yr 9), in contrast to the \$11.2M funding commitment DCC made to this project in the 2022 Annual Plan.
35. The Ōtepoti Pathways Business Case identified the 'Tunnels Trail City Link Route' (between Caversham and Central City) as a priority for the city.
36. The Tunnels Trail is listed in the FDS 2024 as an infrastructure improvement that is required to service existing development capacity and proposed future development areas, by connecting Dunedin with Mosgiel and communities along this route. The trail will help to reduce congestion on the Southern Motorway and southern entrance to the city and increase connection throughout the city bounds and thus aligns with ORC's strategic goals as outlined in paragraph 32.
37. The ORC would like DCC to reconsider its investment in this critical project, while acknowledging the constrained fiscal environment.

Improvements to the Shore Street/Portsmouth Drive

38. Similarly, the improvements to the Shore Street/Portsmouth Drive intersection would reduce congestion and enhance connection.
39. This would be achieved by improving traffic flow through this intersection, and by providing a safe road crossing for pedestrians and cyclists to join the shared cycle and walking path along the harbourside.
40. The ORC notes the proximity of Bayfield High School, several primary schools and a sports ground to this intersection. The improvements would support these schools with their travel planning by improving road safety for tamariki and rangitahi.
41. The project will deliver on the ORC goals outlined in paragraph 32, and with the goals of the Zero Carbon Plan.

Transport investment in the city centre upgrades

42. Transport investment in the city centre upgrades would assumably increase uptake of public transport and make active transport an easier and safer option for short journeys in the urban area.
43. It is difficult to comment further on the impact of excluding this project from the LTP as scant information is provided.
44. It is likely however that this project aligns with the ORC goals outlined in paragraph 32, with the goals of the Zero Carbon Plan, and the Ōtepoti Dunedin Pathways Plan.

Concluding remarks

45. The ORC thanks the DCC for the opportunity to submit on the 9 Year Plan.
46. The ORC commends the DCC for investing in climate-positive projects and suggests the DCC reconsider funding the elements in the Climate Investment Packages outlined in this submission.
47. The ORC wishes to be heard in support of this submission if the opportunity arises.

Nāku iti nei, nā

A handwritten signature in blue ink, appearing to read 'Gretchen Robertson'.

Cr Gretchen Robertson

Chairperson