

BEFORE A PANEL APPOINTED BY THE DUNEDIN CITY COUNCIL

IN THE MATTER **of the Resource management Act 1991 (RMA)**

AND

IN THE MATTER OF **Proposed Variation 2 of the Second Generation
Dunedin District Plan – Appeals Version (2GP)**

**BY CONRAD ANDERSON ON BEHALF OF HELEN THOMAS, SUBMITTER
OS35.001**

DATE: 26 OCTOBER 2021

Anderson & Co (Otago) Limited
Planning and Resource Management
Dunedin

CS Anderson

PO Box 5933
Dunedin 9058
www.RMApro.co.nz

Ph (03) 479 0005
Cell 027 252 0141

Qualifications and experience:

1. My name is Conrad Anderson, and I am a director of Anderson & Co (Otago) Limited.
2. I hold a Masters in Planning from the University of Otago. I have over 9 years of professional experience in planning, and I am a member of the New Zealand Planning Institute. I have experience working with the private sector as a consultant planner.

Extent of Evidence

3. This does not constitute Expert Witnesses evidence, as the matters are outside my area of expertise. This has been completed as a 'lay person', providing comment on behalf of Helen Thomas, who made a submission on the 2GP Var 2.

Background:

4. IN09 seeks rezoning from General Residential 1 zone to General Residential 2 zone at Maori Hill, and associated changes.
5. The area of IN09 covers approximately 59 hectares (590,000m²) of residential land.
6. Helens submission (OS35.001) seeks that IN09 be declined.

Var 2 Reports:

7. The area associated with IN09 has the greatest number of pre 1940 dwellings (being 326¹ dwellings) when compared to the other areas identified for intensification (i.e. IN01-IN08, IN10-IN13). The quantum of pre 1940 dwellings is likely to assist to differentiate the character of IN09, along with the existing level of mature green space and narrower streets.
8. In the Variation 2 s32 Report Appendix 9 Medium Density character assessments (Feb 2021), the report notes (on page 35) the subject area is:
“Capable of absorbing some intensification of development without a detrimental effect on the area’s character, but streetscape amenity may be threatened. Design guidelines may be required to mitigate the potential effects of intensification.”
9. Please note the emphasis associated with the underlining of the word 'some' is from the report. Such emphasis is not used in any other part of the Appendix 9 report, which may suggest that the acceptable level of intensification may be less within IN09 than that of other areas.
10. In terms of the anticipated change in density for the IN09 area, the Variation 2 s32 Report, Feb 2021 (page 178, para 961) states:

¹ For comparison the number of pre 1940 dwellings in the other IN areas range from 0 to 248, with an average of just 69 dwellings. Refer page 27 of the S42A report, 12 Oct 2021.

“It is estimated that the rezoning will provide additional development potential for approximately 45 dwellings.”

11. We requested copies of Council modelling which identified that IN09 would result in 45 dwellings. However, the information available is aggregated data at a level much higher than each identified area i.e. the aggregated data uses an area defined as ‘Inner Suburbs’, which includes Anderson Bay, South Dunedin, Roslyn, Maori Hill and more (refer Housing Capacity Assessment Dunedin City, July 2021). In addition, the actual model is not available for examination. As a result it is impossible to review the conclusion that IN09 will result in an additional 45 dwellings.
12. While I have no expertise in urban design, I am assuming that Council staff have generally concluded that an additional 45 dwellings over a residential area of 55 hectares would have limited impact. This seems to support the conclusion at Para 971 of the S32 Report (Feb 2021) that the rezoning would provide a “reasonable increase” in feasible development capacity.
13. Therefore, can it be assumed that development beyond 45 dwellings would be considered an unreasonable increase?

What could potential development look like?

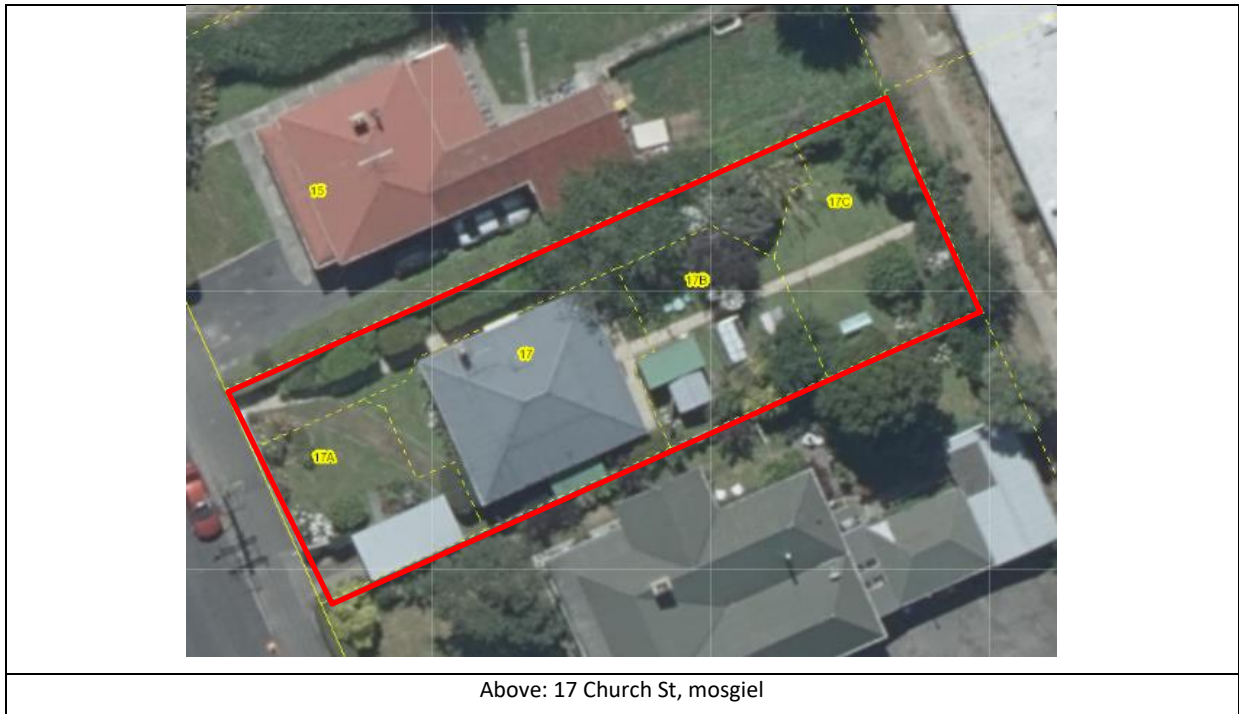
14. Dunedin is well experienced with the GR2 zone, with the largest GR2 areas being South Dunedin and a large part of Mosgiel. Some recent ‘real world’ GR2 developments include the following:

Address	Site Size	Number of units	Average land area per unit
21 Irvine St, Mosgiel	809m ²	6	135m ²
1 Dey St, Mosgiel	603m ²	5	121m ²

15. Below is the layout for 1 Dey Street which provides for 4 x 1 bedroom units and 1 x 2 bedroom unit (and the Irvine St layout is similar, with the one bedroom units having a floor area of 45m²).



16. The above are examples of where the original dwelling had been removed, allowing for redevelopment of the full site. The following example is at 17 Church Street Mosgiel, which was a 895m² site with an existing dwelling. Development was infill, in front and behind the original dwelling, followed by subdivision. The resulting average site size is 234m², with the front site being just 98m².





Above: Development at 17 Church St

17. Please note, the use of the above examples is not a criticism of those developments. They are included solely to provide real examples of density in the GR2 zone.

18. As shown by the Mosgiel examples, significant intensification is possible in the GR2 zone. To reach 45 new units, only 10 sites would need to be redevelopment.

19. Examples on possible infill sites in the IN09 area could include:

- The front parts of 14-18 Como St.
- The 'internal area' between Falkland St, Lothian St and Pollock St.
- Within rear yards, such as 84-90 Grendon St (4 lots, around 770m² each).
- The large sites with developed land, such as 7 Drivers Road (this site is just over 5,000m² with a large dwelling towards the northern end of the site).

20. In the more recent S42A Report (12 Oct 2021) there is comment from the Urban Designer, which in terms of the IN09 area, states:

*“I **partly concur** with the submitters regarding the loss of green space, additional shading and heritage values; however, I also believe that the suburb provides excellent opportunities for intensification close to existing services and amenities” (Para 31, Appendix 9).*

Emphasis added

21. Repeating the comments from the earlier reports, where it was identified that the area is “*Capable of absorbing **some intensification** of development without a detrimental effect on the area’s character, but streetscape amenity may be threatened*” (emphasis added), and that anticipated level of intensification of 45 dwellings was found to be acceptable.

22. The S42A Report author interprets these comments as “*Mr Christos **acknowledges** the submitters concerns but considers that the suburb provides excellent opportunities for intensification...*” (Emphasis added)
23. I don’t consider “partly concur” is equivalent to “acknowledge”. Further, the limitation implied by the use of “some” intensification, seems to have been overlooked.

Other Matters - Traffic

24. There are already existing issues with the local transport network in the IN09 area, and this is clearly stated (refer para 969, Var 2, s32 Report). The increasing risk associated with increased traffic as a result of increased densities is a logical conclusion. However, while traffic safety (now and into the future) is acknowledged as a concern in the various reports, it is not actually addressed. This is evident on page 63 of the s42A Report (12 Oct 2021), which notes improvements around Maori Hill School, but is silent on risks in the much wider area (55ha) associated with IN09.

Conclusion

25. Council has acknowledged traffic concerns within IN09, and intensification will not be helpful in this regard. That risk has not been addressed in the Council reports.
26. The area associated with IN09 is large, has a desirable character (partly due to the combination of a substantial number of pre 1940 dwellings and mature green spaces).
27. Councils experts have concluded that the area is capable of absorbing some development, and 45 new dwellings are anticipated.
28. However, the above indicates that many more than 45 dwellings could be possible, thus potentially putting the existing character at risk.
29. In terms of the likelihood of the risk and the effect associated with the risk: while the likelihood could be debated, the effect (being the loss of character) would be irreversible. On that basis, the Submitter requests the Panel to err on the side of caution, by declining to accept IN09.

Date: 26 October 2021

Conrad Anderson

Anderson & Co (Otago) Limited