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2nd Generation Dunedin City District Plan (2GP) Variation 2
Dunedin City Council
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Submission on 2GP Variation 2: Additional Housing Capacity

Tēnā koutou katoa

1. Thank you for the opportunity to make a submission on the Dunedin City Council's (DCC's) 2PG Variation 2: Additional Housing Capacity.

2. The Otago-Southland branch of Public Health Association of New Zealand (PHAOS) congratulate the DCC on proactively seeking to identify additional housing capacity through proposed rezoning of sites identified within the Variation 2 – Additional Housing Capacity plan. Changes to minimum site area, removal of family occupancy requirements on existing properties and the reduction in allowable site size for subdivision are sensible improvements.

3. The PHA recognises *te Tiriti o Waitangi* as Aotearoa New Zealand's founding document, defining respectful relationships between tangata whenua and tangata Tiriti. We are actively committed to supporting *te Tiriti* in all policy and legislation.

4. PHAOS promotes implementation of the 1948 Universal Declaration of Human Rights and the 1967 International Covenant on Economic, Social and Cultural Rights both of which recognise adequate housing as part of the right to an adequate standard of living.

5. PHAOS advocates for action on the United Nations Sustainable Development Goals (SDGs), in particular [Goal 11: Sustainable cities and communities](#), which has as its first key target: 'to ensure access for all to adequate, safe and affordable housing.' (1)

6. PHAOS recognises housing as a key determinant of health and wellbeing. In particular PHAOS support proposed 2GP Variations that:

- Align with the imminent systemic and societal change to be driven by Aotearoa NZ's response to the 'Climate Emergency';
- Align with the [National Policy Statement on Urban Development 2020](#) (NPSUD) which, in addition to enabling housing capacity, requires all practicable steps to build "well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future"; (2)

- Align with the DCC's capacity and capability to provide '3 Waters' infrastructure that aligns with proposed amendments contained in "[The Water Services Bill](#)". This Bill seeks to repeal Part 2A of the Health Act 1956 and replace it with a stand-alone Act to regulate drinking water. Further this forms part of a broad policy initiative which "comprehensively reform the drinking water regulatory system, with targeted reforms to improve the regulation and performance of wastewater and stormwater networks"; (3) and
- Align with [Te Mana o Te Taiao – Aotearoa NZ Biodiversity Strategy 2020](#) whose vision is Te Mauri Hikahika o te Taiao, "The mauri of nature is vibrant and vigorous." (4)

7. This PHAOS submission predominantly relates to an analysis of the criteria on which proposals are based [Section-32-Appendix-5-Site-Assessment-Criteria-Table-December-2020.pdf](#). We seek reassurance that:

- Medium Density (MD) development doesn't inadvertently cause negative outcomes for renters.
- Public Transport/Active Transport (PT/AT) has been accounted for in the choice of proposed development locations, especially Greenfield development. While criteria in the risk assessment model includes proximity to a bus stop, it is difficult to gauge the extent to which AT has been considered. Otago University's Active Living Lab "[Turning the Tide - from Cars to Active Transport](#)" (5) provides illustration of health co-benefits from PT/AT.
- Housing design and quality that incorporates climate change mitigation and adaptation can be encouraged or even mandated in future developments. This is an opportunity for DCC to lead and provide exemplars on the health co-benefits that can be achieved through housing design and quality.
- Soil mapping will be accelerated so that knowledge of soil quality can be upgraded to allow more informed land use management decisions. We understand a low proportion of Dunedin's lands have been adequately mapped. This appears to be an unacceptable risk in assessing whether land can be deemed suitable for increasing carbon sinks / capable of increasing biodiversity or food production, for example.
- The assessment of soil quality is currently sound, in terms of the LUC 1-3 rating as a benchmark for land-use. For example, Polwarth Road & Wakari Road – the plan states most of this area is identified as having high class soils, but no LUC 1-3 soils – therefore acceptable. Is it acceptable to lose any primary productivity? (as stated for 2 sites). Further, Honeystone Street has high class soils in 50% of the site but due to having no LUC 1-3 rated land it is deemed lower risk. The report goes on to say this area has 6ha of productive land (out of 8.9ha total) yet concludes "the loss of primary productivity is relatively low".

Ngā mihi nui,
Louise Mainvil
Chair

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1. United Nations Development Programme. *Goal 11. Sustainable Cities and Communities* [Internet]. 2015 [cited 2021 March 04]. Available from: <https://www.undp.org/content/undp/en/home/sustainable-development-goals/goal-11-sustainable-cities-and-communities.html>
 2. Ministry for the Environment. *About the National Policy Statement on Urban Development* [Internet]. 2020 [cited 2021 March 04]. Available from: <https://www.mfe.govt.nz/about-national-policy-statement-urban-development>
 3. NZ Government Legislation. *Water Services Bill 314-1*. [Internet]. 2020. [cited 2021 March 04] <https://legislation.govt.nz/bill/government/2020/0314/latest/whole.html#LMS374563>
 4. Ministry for the Environment. *Te Mana o Te Taiao Aotearoa New Zealand Biodiversity Strategy*. [Internet]. 2020. [cited 2021 March 04] <https://www.doc.govt.nz/globalassets/documents/conservation/biodiversity/anzbs-2020-summary.pdf>
 5. Mandic, S., Jackson, A., Lieswyn, J., Mindell, J., Bengoechea, E. G., Spence, J., . . . Hinckson, E. (2019). *Turning the Tide - from Cars to Active Transport*. University of Otago, Dunedin NZ